The eCTD BACKBONE FILES SPECIFICATION FOR MODULE 1

Revision History

Date	Version	Summary of Changes		
2003-08-13	1.0	Original version		
2004-03-01	1.1	Clarifications to the original version		
2006-04-13	1.2	Change to Related Sequence Example		
2006-12-13	1.3	Change to XML coding for a supplement to an original application		
		related sequence example		
2012-06-01	2.0	Change to reflect major modifications to Module 1 (admin) and		
		the use of attributes (Summary of Changes in Appendix 2)		
2012-11-01	2.1	Changes include updating the DTD version references and		
		includes a copy of the updated DTD version 3.1 in Appendix I		
		(Summary of Changes in Appendix 2)		
2013-08-23	2.2	Changes include two additional attributes for m1.15.2.1., updating		
		the DTD version references and updating the copy of the DTD in		
		Appendix I (Summary of Changes in Appendix 2)		
2014-02-07	2.3	Modified the heading for 1.15.1.5 (Summary of Changes in		
		Appendix 2)		

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INTRODUCTION

This document provides specifications for creating the electronic common technical document (eCTD) backbone file for Module 1 for submission to the FDA. It should be used in conjunction with the guidance to industry: *Providing Regulatory Submissions in Electronic Format* — *Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications.*

Font formatting conventions are used in this document to enhance its readability and emphasize items such as heading elements, attributes, titles, and file names:

- **Bold italic** font is used for elements and attributes.
- *Italic* font is used for links, leaf titles, publication titles, file names, and folder names.

The Module 1 eCTD Backbone File (*us-regional.xml*) includes administrative information and information for each file submitted in Module 1. The backbone file contains an XML element named *fda-regional:fda-regional*, which contains both the *admin* and *m1-regional* elements. The individual file information is provided within an XML element called the *leaf* element. The *leaf* elements are organized using the Module 1 section headings. The Module 1 section headings are named and organized according to the subject matter of the information contained in the files. Section headings are provided as XML elements in the *m1-regional* element of the backbone file. Administrative information about each submission is provided in the *admin* element of the backbone file.

The Module 1 eCTD Backbone File may be used in a wide range of applications and related submission types; therefore, a specific submission may not use all of the possible section heading elements. Only include the section headings that reference files in the submission. Empty section headings should not be included. The *admin* element should always be included, and it contains two elements named: *applicant-info* and *application-set*. These elements should be included in order as listed in *section III Admin Elements*.

The *us-regional-v3-3.dtd* file (refer to <u>Appendix 1</u>) provides the organization for each element used in the *us-regional.xml* file.

I. USE OF ATTRIBUTES

Certain *admin* and *m1-regional* heading elements require an attribute to provide information that is pertinent to the application and submission. The attribute lists are maintained as separate XML files, and each contains a standard set of codes and display names for each defined attribute type. The attribute files contain a version number, version date and coded values and display names for each value. Each coded value has a status of "active" or "inactive" to accommodate future changes; only coded values with a status of "active" should be submitted. Only the code should be provided as the attribute value in the appropriate element in the *us-regional.xml* file. The display name is shown to the reviewers in the review tool.

The following table contains the names of the attribute type lists and their respective file names. Refer to the FDA web site for the current versions of each list:

http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.

Table 1: Attribute List Table

Attribute Type	File Name
applicant-contact-type	applicant-contact-type.xml
telephone-number-type	telephone-number-type.xml
application-type	application-type.xml
submission-type	submission-type.xml
submission-sub-type	submission-sub-type.xml
supplement-effective-date-type	supplement-effective-date-type.xml
form-type ¹	form-type.xml
promotional-material-audience-type	promotional-material-audience-type.xml
promotional-material-doc-type	promotional-material-doc-type.xml
promotional-material-type	promotional-material-type.xml
material-id	Provided by the applicant
issue-date	Provided by the applicant

II. START OF THE MODULE 1 eCTD BACKBONE FILE

Name the Module 1 eCTD Backbone File *us-regional.xml* and place it in the *us* folder that is in the folder named *m1* as described in *Providing Regulatory Submissions in Electronic Format*— *Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications.* For example, the path for the *us-regional.xml* file for sequence number 0006 is 0006/m1/us/us-regional.xml. Include a reference to a *leaf* element in the Module 2 to 5 eCTD

Backbone File (*index.xml*) for the *us-regional.xml* file. In the corresponding Module 2 to 5 eCTD

Backbone File, the *operation* attribute should have a value of "new."

The header of the Module 1 eCTD Backbone File is always the same. It contains machine-readable information about the following:

- Version of XML being used
- Type of characters that are allowed in the file
- Locations of the standards that control the organization of the file

The common header is provided below:

```
<?xml version="1.0" encoding="UTF-8" standalone="no"?>
<!DOCTYPE fda-regional:fda-regional SYSTEM "http://www.accessdata.fda.gov/static/eCTD/us-regional-v3-
3.dtd">
<?xml-stylesheet type="text/xsl" href="http://www.accessdata.fda.gov/static/eCTD/us-regional.xsl"?>
<fda-regional:fda-regional dtd-version="3.3" xml:lang="text" xmlns:fda-regional="http://www.ich.org/fda"
xmlns:xlink="http://www.w3c.org/1999/xlink">
...
```

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¹ The 356h and 1571 forms are placed in their respective application's *admin* section and other forms are placed in the module 1 heading element *m1-1-forms* using the *form* element.

All the heading elements and content for Module 1 should be provided after these elements and before the last element closing tag named </fda-regional:fda-regional>.

III. ADMIN ELEMENTS

Administrative information is contained in the *admin* element, which is contained in the *fda-regional:fda-regional* element. The *admin* element contains two child elements: *applicant-info* and *application-set*. These elements should be placed in order as listed below.

```
...
<fda-regional:fda-regional>
<admin>
<applicant-info> </applicant-info>
<application-set> </application-set>
</admin>
<m1-regional>
</m1-regional>
</fda-regional:fda-regional>
...
```

A. Applicant-info Element

The applicant-info element contains the following child elements: *id*, *company-name*, *submission-description*, and *applicant-contacts*.

1. ID Element

The *id* element is the Data Universal Numbering System (D-U-N-S®) number that is assigned and maintained by Dun & Bradstreet. The nine (9)-digit D-U-N-S® number serves as a unique identifier (code) of a business entity and it is increasingly being used as a resource for FDA to assure accurate identification and to verify certain business information for that entity, e.g., trade names used by the entity, and addresses; the number will supplement other identifiers such as the company-name element. The D-U-N-S® number for the business entity that is the sponsor, applicant or holder of the submission should be provided and if applicable, it should match that used in the User Fee system. The same D-U-N-S® number should be used for all submissions to an application, unless there is a change in ownership of the application. Provide this element with every submission.

2. Company-name Element

The sponsor or applicant's name is located in the *company-name* element. An example of the *company-name* element for the "Very Best Drug Company" is provided below:

```
... <company-name>Very Best Drug Company</company-name> ...
```

Provide this element with every submission.

3. Submission-description Element

The *submission-description* element is an optional field that allows up to 128 characters. Only the first 128 characters of the *submission description* element will be displayed.

- The information in the *submission-description* element should be a high level description of the purpose of the submission and also help differentiate between similar types of submissions.
- Some examples of helpful submission descriptions are listed below:
 - Supplement provides for new manufacturing site
 - New site for API manufacture, DSM Ltd, Groningen, NL
 - Proposed indication of an efficacy supplement
 - Pharmtox Information Amendment Final Study Report A1001
 - Clinical Information Amendment New Protocol A001100
 - Response to an IR letter and date
 - Type of amendment (clinical new protocol, clinical protocol amendment, pharmacology, toxicology, etc.)
- The field should not:
 - contain a response to FDA inquiries
 - replace the cover letter
 - pose questions to the FDA
 - contain information that is in support of an application or is needed in the approvability or acceptability of an application, or
 - contain information that is critical or needs to be reviewed.

4. Applicant-contacts Element

The *applicant-contacts* element contains one or more *applicant-contact* elements. Provide at least one complete *applicant-contact* element with every submission. The elements contained in the *applicant-contact* element are: *applicant-contact-name*, *telephones*, and *emails*. For the *applicant-contact-name* element, include the *applicant-contact-type* attribute. The *telephones* element contains a *telephone* element limited to 64 characters that requires the *telephone-number-type* attribute. The *emails* element contains an *email* element limited to 64 characters that does not require an attribute. When attributes are required, they should be provided as coded values from their corresponding attribute list (*applicant-contact-type.xml* and *telephone-number-type.xml*). The current valid codes for *applicant-contact-type* and *telephone-number-type* are available on the FDA web site:

<u>http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.</u>

An example of the *applicant-contacts* element containing two *applicant-contact* elements is shown below and includes: contact names, telephone numbers, email addresses and coded attributes. The *applicant-contact* element below shows Jane Smith as a regulatory contact and John Smith as the technical contact, with their respective example contact information:

```
.... <applicant-contacts>
```

```
<applicant-contact>
           <applicant-contact-name applicant-contact-type="fdaact1">Jane Smith</applicant-contact-name>
          <telephones>
               <telephone telephone-number-type="fdatnt1">1-212-555-1234</telephone>
               <telephone telephone-number-type="fdatnt3">1-212-555-5678</telephone>
          </telephones>
           <emails>
               <email>jane.smith@gooddrugs.com</email>
          </emails>
   </applicant-contact>
     <applicant-contact>
          <applicant-contact-name applicant-contact-type="fdaact2">John Smith</applicant-contact-name>
          <telephones>
               <telephone telephone-number-type="fdatnt1">1-212-555-1213</telephone>
               <telephone telephone-number-type="fdatnt3">1-212-555-4546</telephone>
          </telephones>
          <emails>
                <email>john.smith@gooddrugs.com</email>
   </applicant-contact>
</applicant-contacts>
. . .
```

B. Application-set Element

The *application-set* element may contain one or more *application* elements. This provides the functionality to submit a single submission to more than one application, which is also referred to as a "grouped submission" (refer to <u>section IV. Grouped Submissions</u>). If more than one *application* element is provided, each *application* element must contain the *application-information* and *submission-information* child elements.

Each *application* element has a required attribute of *application-containing-files* and requires a value of either "true" or "false." The purpose of the *application-containing-files* attribute is to indicate the application number folder where files will be stored (refer to <u>section IV. Grouped Submissions</u>). For a submission to only one application, this attribute value should be "true." For a grouped submission, a value of "true" should only be set in one application element.

The elements contained in the *application* element are *application-information* and *submission-information*, and they should be included in order as listed here.

1. Application-information Element

The elements contained in the *application-information* element are *application-number* and *cross-reference-application-number*.

a. Application-number element

Provide the six (6)-digit application number in the *application-number* element. Provide only numeric digits, including any leading zeros for the application number, without letters or dashes.

Each *application-number* element requires an attribute of *application-type*, and the attribute should be provided as a coded value from its corresponding attribute list (*application-type.xml*). The current

valid codes for *application-type* are available on the FDA web site: http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.

The following is an example of the *application-number* element for NDA 456789. In this example, the application number contains the attribute value of "fdaat1" for the *application-type*, which indicates it is a new drug application (NDA).

```
... <application-number application-type="fdaat1 ">456789</application-number> ...
```

Provide this element and attribute with every *application* element in the submission.

b. Cross-reference-application-number element

This element should only be provided when an application makes reference to other applications. Cross references are unnecessary when the application(s) being referenced are in the *application-set*.² A cross reference only needs to be identified once.

Provide the six (6)-digit application number in the *cross-reference-application-number* element. Only provide numeric digits, including any leading zeros for the application number, without letters or dashes.

Each *cross-reference-application-number* element requires an attribute of *application-type* and the attribute should be provided as a coded value from its corresponding attribute list (*application-type.xml*). The current valid codes for *application-type* are available on the FDA web site:

<u>http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.</u>

The following is an example of a *cross-reference-application-number* element. In this example, the application NDA 456789 cross-references DMF 012345. The *cross-reference-application-number* element contains the attribute value of "fdaat5" for the *application-type*, which indicates it is a Drug Master File (DMF).

```
<application-number application-type="fdaat1">456789</application-number>
<cross-reference-application-number application-type="fdaat5">012345</cross-reference-application-number>
...
```

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² The cross reference electronically provides the same information found on the 356h and 1571 application forms.

2. Submission-information element

The *submission-information* element contains three child elements: *submission-id*, *sequence-number*, and *form*.

a. Submission-id element - <submission-id>

The *submission-id* element is used to identify each individual regulatory activity (original application, supplement, annual report, etc.) in an application. All submissions that belong to a specific regulatory activity (for example, a supplement and all amendments related to that supplement) should contain the same four (4)-digit number in their *submission-id* element. The four (4)-digit *submission-id* number for each regulatory activity is determined by the *sequence-number* of the first submission to each new regulatory activity. The *submission-id* should match the four (4)-digit *sequence-number* for that first submission to the new regulatory activity (refer to *section III.B.2.b. Sequence-number element* and *section III.B.3. Building Regulatory Activities* for additional details). Provide the four (4)-digit number in the *submission-id* element, including any leading zeros.

The *submission-id* element contains two attributes: *submission-type* and *supplement-effective-date-type*. The *supplement-effective-date-type* attribute is only required and applicable to the submission types: efficacy supplement, labeling supplement, or chemistry manufacturing controls supplement with a *submission-sub-type* of "application." The attributes should be provided as coded values from their corresponding attribute lists (*submission-type.xml* and *supplement-effective-date-type.xml*). The current valid codes for *submission-type* and *supplement-effective-date-type* are available on the FDA web site:

<u>http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.</u>

For the correct usage of *submission-type* and *supplement-effective-date-type*, refer to <u>Tables 2</u> and <u>3</u> below. <u>Table 2</u> provides the descriptions of use for each *submission-type* and <u>Table 3</u> provides the description and usage of each *supplement-effective-date-type*. When applying these attributes, it is important to only use them according to the "valid for" sections provided in these tables.

Below is an example of a *submission-id* element for a labeling supplement to an application. This *submission-id* element also includes the *submission-type* attribute and the *supplement-effective-date-type* attribute. In this example, the *submission-id* is identified as "0009" (refer to <u>section III.B.3. Building Regulatory Activities</u> for additional details on assigning the correct *submission-id* number to each regulatory activity), it has a *submission-type* attribute code of "fdast4": indicating that the submission type is a labeling supplement, and it has a *supplement-effective-date-type* of "fdasedt2": indicating that it is a CBE-0 supplement.

<submission-id submission-type="fdast4" supplement-effective-date-type="fdasedt2">0009</submission-id>
...

b. Sequence-number Element - < sequence-number>

The *sequence-number* element is used to uniquely identify each individual submission to an application. It must be a unique number with a maximum of four (4)-numeric digits, should start at 0001, and should not exceed 9999. The *sequence-number* should normally be incremented by one

each time a submission is made to the application. The *sequence-number* element contains the attribute *submission-sub-type*, used to further clarify the purpose of the submission. Only certain *submission-sub-type* attributes are applicable to certain submission types. For the correct usage of the *submission-sub-type* attribute, refer to <u>Tables 2</u> and <u>4</u> below. These tables provide the description for each *submission-sub-type* and outline the correct usage of submission sub-types for each *submission-type*. The attribute should be provided as a coded value from its corresponding attribute list (*submission-sub-type.xml*). The current valid codes for *submission-sub-type* are available on the FDA web site:

http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.

In the example below, the *sequence-number* element contains "0004" indicating that it is the fourth submission to the application and the *submission-sub-type* attribute contains the code of "fdasst4" indicating that it is an amendment.

```
... <sequence-number submission-sub-type="fdasst4">0004</sequence-number>
```

c. Form Element - <form>

To accommodate grouped submissions, certain forms should only be referenced in the *form* element contained in the *submission-information* element. This will allow these forms to only display in review tools under the specified application. The *form* element is further described in <u>section VI.B.</u>

M1 Forms and the form types with their designated reference locations are referenced in <u>Table 10</u>.

For all form leafs referenced in the *form* element or Module 1 heading element, the attribute of *form-type* is required and indicates the type of form being referenced and submitted.

In the example below, the *form-type* attribute indicates the form is Form FDA 356h. Multiple leafs can be provided for a form element in order to accommodate attachments (e.g. establishment description information).

-

³ Refer to the current version of the form-type.xml for a complete list of forms.

Table 2: Submission Types and Descriptions of Use

Submission Type	Submission Sub-Type	Supplement Effective Date Type (if applicable and submission-sub-type = "application")	Valid For Application Types
Original Application	Presubmission Application Amendment Resubmission		IND, NDA, ANDA, BLA, DMF, EUA
Efficacy Supplement	Presubmission		NDA, BLA
	Application	Prior Approval Supplement (PAS)	
	Amendment Resubmission		
Chemistry Manufacturing	Presubmission		NDA, ANDA, BLA
Controls Supplement	Application	Prior Approval Supplement (PAS), Changes Being Effected (CBE-0), or Changes Being Effected 30 (CBE-30)	
	Amendment Resubmission		
Labeling Supplement	Presubmission		NDA, ANDA, BLA
	Application	Prior Approval Supplement (PAS) or Changes Being Effected (CBE-0)	
	Amendment Resubmission		
Annual Report	Report Amendment		IND, NDA, ANDA, BLA, DMF
Product Correspondence	Correspondence Amendment		IND, NDA, ANDA, BLA, DMF
Postmarketing Requirements or Postmarketing Commitments	Original Amendment		NDA, BLA
Promotional Labeling Advertising	Original Resubmission Amendment		NDA, ANDA, BLA
IND Safety Reports	Report Amendment		IND
Periodic Safety Reports (Periodic Adverse Drug Experience Report (PADER) or Periodic Safety Update Report (PSUR))	Report Amendment		NDA, ANDA, BLA

Table 3: Supplement-Effective-Date-Types and Descriptions of Use

Supplement Effective Date	Description	Valid for Submission Types
Prior Approval Supplement (PAS)	The Prior Approval Supplement is a supplement submission for a major change for which distribution of the product made using the change cannot occur prior to FDA approval as provided for in 21 CFR 314.70 and 21 CFR 601.12(b).	Efficacy Supplement, Chemistry Manufacturing Controls Supplement, Labeling Supplement
Changes Being Effected (CBE-0)	The "Changes Being Effected" is a supplement submission for certain moderate changes for which distribution can occur when FDA receives the supplement as provided for in 21 CFR 314.70 and 21 CFR 601.12(c)(5).	Chemistry Manufacturing Controls Supplement, Labeling Supplement
Changes Being Effected 30 (CBE-30)	The "Changes Being Effected in 30 Days" is a supplement submission for certain moderate changes that must be submitted to FDA at least 30 days before the distribution of the product made using the change as provided for in 21 CFR 314.70 and 21 CFR 601.12(c).	Chemistry Manufacturing Controls Supplement

Table 4: Submission Sub-Types and Descriptions of Use

Submission Sub-Type	Description	Valid For the Listed Submission Types
Presubmission	A submission to the Agency that occurs prior to the actual submission of a full application (e.g., rolling review, reviewable unit, clinical information that the applicant requests comment on prior to submitting their application). Not all applications will have presubmissions.	Original Application, Efficacy Supplement, Chemistry Manufacturing Controls Supplement, Labeling Supplement
Application	The submission that represents the application's primary supportive material. There should only be one submission with a sub-type of application within a given submission group.	Original Application, Efficacy Supplement, Chemistry Manufacturing Controls Supplement, Labeling Supplement
Amendment	A submission that contains additional supportive material to augment information previously submitted. Examples include responses to information requests, additional draft labeling during negotiations, etc.	Original Application, Efficacy Supplement, Chemistry Manufacturing Controls Supplement, Annual Report, Product Correspondence, Postmarketing Requirements or Postmarketing Commitments, Promotional Labeling

Submission Sub-Type	Description	Valid For the Listed Submission Types
		Advertising, IND Safety Reports, Periodic Safety Reports (Periodic Adverse Drug Experience Report (PADER) or Periodic Safety Update Report (PSUR))
Resubmission	A submission that contains additional information for the Agency to consider following the issuance of an action communication to the applicant (e.g., complete response or inactivation). For promotional labeling and advertising, the submission of revised promotional materials that were previously submitted as an original submission sub-type. Includes requests for advisory on launch materials, requests for advisory on nonlaunch materials, pre-submission of promotional materials for accelerated approval products, and materials submitted under the Pre-Dissemination Review of Television Ads Program.	Original Application, Efficacy Supplement, Chemistry Manufacturing Controls Supplement, Labeling Supplement, Promotional Labeling Advertising
Report	A submission that contains a new annual report, IND Safety Report, or Periodic Safety Report (Periodic Adverse Drug Experience Report (PADER) or Periodic Safety Update Report (PSUR)).	Annual Report, IND Safety Reports, Periodic Safety Reports (Periodic Adverse Drug Experience Report (PADER) or Periodic Safety Update Report (PSUR))
Original	Submission of original promotional materials including all promotional labeling and advertising submissions, or Postmarketing Requirements or Postmarketing Commitments	Promotional Labeling Advertising, Postmarketing Requirements or Postmarketing Commitments
Correspondence	Routine: administrative changes, e.g., change of address, authorized official, or meeting requests. Donor re-entry request: An applicant's request to re-enter a deferred donor when regulations and/or guidance do not provide a qualification method or process for their specific situation. (21 CFR 610.41(b)) License re-issuance: request from applicant to change legal name. Lot distribution report: Postmarketing report required by 21 CFR 600.81 to be submitted every six (6) months upon approval/licensing of vaccine or biologic product. Final labeling	Product Correspondence

3. Building Regulatory Activities

A regulatory activity is established, defined and identified by the submission type in an eCTD application. The purpose could be a notification of a change or a request to approve a new product or change. There can be one or more regulatory activities within an application and each regulatory activity can consist of one or more submissions.

The first submission to a regulatory activity establishes the *submission-id* that will be used in subsequent submissions for the same regulatory activity in an application. Using the same *submission-id* number for a regulatory activity allows the related submissions to be grouped together for that regulatory activity. In an eCTD submission, the *submission-id* element and *submission-type* attribute are used to group regulatory activities; the *sequence-number* element and *submission sub-type* attribute are used to indicate the order of submissions submitted for the same regulatory activity.

All submissions related to a single regulatory activity should be grouped together. This is accomplished by using the *submission-id* number. The number used in the *submission-id* element is determined by the *sequence-number* of the first submission to each regulatory activity. For example, if the original application is *sequence-number* 0001, then the *submission-id* for that regulatory activity is also 0001. When an amendment is submitted to this original application, the *submission-id* 0001 is used (to show the submissions are related), while the *sequence-number* is incremented by one for each subsequent submission (refer to Scenario 1 below).

The following two scenarios demonstrate the use of *submission-id*, *submission-type*, *sequence-number* and *submission-sub-type*:

Scenario 1: In this scenario, an applicant is submitting the first submission to the original application. The *submission-id* should match the *sequence-number* since it is the first submission for this regulatory activity (original application). The *submission-id* and *sequence-number* should both contain "0001," and the appropriate *submission-type* code is used to indicate that it is an original application. All submissions that relate to this original application (regulatory activity) should contain the same *submission-id* of "0001."

Table 5: Building Regulatory Activities – Scenario 1

The Original Application regulatory activity consists of two presubmissions, the original				
application, and two amendments and is identified by the <i>submission-id</i> number "0001."				
Presubmission (meeting request)				
submission-id	0001			
submission-type attribute	fdast1 (Original Application)			
sequence-number	0001			
submission-sub-type attribute	fdasst2 (presubmission)			
Presubmission (meeting package)				
submission-id	0001			
submission-type attribute	fdast1 (Original Application)			
sequence-number	0002			
submission-sub-type attribute	fdasst2 (presubmission)			
Original Application				
submission-id	0001			
submission-type attribute	fdast1 (Original Application)			
sequence-number	0003			

submission-sub-type attribute	fdasst3 (application)
Amendment #1	
submission-id	0001
submission-type attribute	fdast1 (Original Application)
sequence-number	0004
submission-sub-type attribute	fdasst4 (amendment)
Amendment #2	
submission-id	0001
submission-type attribute	fdast1 (Original Application)
sequence-number	0005
submission-sub-type attribute	fdasst4 (amendment)

Scenario 2: In this second scenario, the first submission for a new efficacy supplement (a new regulatory activity) is submitted to an application; therefore, the number used for the *submission-id* should match the *sequence-number*. Since the *sequence-number* is incremented within the application for each submission and the last sequence number submitted to the application was "0005," both the *submission-id* and the *sequence-number* for this new efficacy supplement will be "0006." This submission and all subsequent submissions that relate to this efficacy supplement will use *submission-id* "0006." The *submission-type* code indicating it is an efficacy supplement is used for the supplement and also for all sequences related to the supplement. The *submission-sub-type* attribute is used (as indicated in <u>Tables 2</u> and <u>4</u> above) to further clarify the purpose of each submission. The *supplement-effective-date-type* indicates it is a Prior Approval Supplement (PAS as indicated in <u>Tables 2</u> and <u>3</u> above)

Table 6: Building Regulatory Activities – Scenario 2

The Efficacy Supplement regulatory activity below consists of three submissions and is identified			
by a submission-id number of "0006."			
Efficacy Supplement (new indication)			
submission-id	0006		
submission-type attribute	fdast2 (Efficacy Supplement)		
supplement-effective-date-type attribute	fdasedt1 (Prior Approval Supplement (PAS))		
sequence-number	0006		
submission-sub-type attribute	fdasst3 (application)		
Amendment #1 to Efficacy Supplement			
submission-id	0006		
submission-type attribute	fdast2 (Efficacy Supplement)		
sequence-number	0008		
submission-sub-type attribute	fdasst4 (amendment)		
Amendment #2 to Efficacy Supplement			
submission-id	0006		
submission-type attribute	fdast2 (Efficacy Supplement)		
sequence-number	0010		
submission-sub-type attribute	fdasst4 (amendment)		

IV. Grouped Submissions

A grouped submission is a single sequence containing a us-regional.xml, index.xml and any other

applicable files applied to more than one application. A grouped submission is also known as a global supplement, global submission, bundled supplement, bundled submission, multiple product submission or trans-BLA. This type of submission eliminates the need to submit multiple, identical submissions to different applications. The files referenced in the grouped submission are applied to all applications indentified. The grouped submission concept does not replace or affect previously existing cross-referencing functionality (use of m1-4-4 or cross application reference links).

The files referenced in the XML backbones will physically reside in the application folder indicated with a value of "true" for the *application-containing-files* attribute. Only one *application* element in a grouped submission should contain a value of "true" for the *application-containing-files* attribute. The application whose *application-containing-files* attribute has a value of "true" is considered the primary application and should remain constant in future sequences.

When referencing or modifying files that were submitted in a grouped submission, it is possible that the files being referenced are not located in the same application type/number folder as the "new" files being submitted. In this case, the *modified-file* leaf attribute must also include the correct application type/number folder where the files are physically stored (refer to <u>section V. Leaf Element</u>).

The following items listed below provide general information and use limitations for submitting a grouped submission to multiple applications⁴:

General Information:

- Initial grouped submissions should only include new leaves.
- When using lifecycle operations of append, delete, or replace in a subsequent grouped submission, the lifecycle operation will apply to the modified leaf in all submissions referenced in the application set.
- The grouped submission's content must reside in the same exact eCTD location for all applications included in the grouped.

Use Limitations:

- Only one application type can be used in a grouped submission.
- Only one submission type can be used in a grouped submission.
- Grouped submissions are only supported using DTD version 3.3 or higher.

Table 7: Grouped Submissions Limitations and Use

Application Types Allowed	Submission Types Allowed	Center Acceptance of Grouped Submission	
Allowed		CDER	CBER
ANDA	Labeling Supplement,	YES	NO
	Chemistry Manufacturing Controls Supplement,		
	Product Correspondence,		
	Promotional Labeling Advertising		
BLA	Efficacy Supplement,	YES	YES

⁴ Electronic consideration(s) for grouped submissions will not supersede the policy and practice of bundled submissions as it may or may not affect user fees per the *Guidance for Industry: Guidance for Industry Submitting Separate Marketing Applications and Clinical Data for Purposes of Assessing User Fees.*

Application Types Allowed	Submission Types Allowed	Center Acceptance of Grouped Submission	
Allowed		CDER	CBER
	Labeling Supplement,		
	Chemistry Manufacturing Controls Supplement,		
	Product Correspondence,		
	Promotional Labeling Advertising		
DMF	Product Correspondence	YES	NO
IND	Annual Report,	YES	NO
	Product Correspondence		
NDA	Efficacy Supplement,	YES	NO
	Labeling Supplement,		
	Chemistry Manufacturing Controls Supplement,		
	Product Correspondence,		
	Promotional Labeling Advertising		

The following two scenarios demonstrate a grouped submission for a Labeling Supplement regulatory activity to three (3) applications and an amendment to the Labeling Supplement. The scenarios also show the use of the *supplement-effective-date-type* attribute for the Labeling Supplement.

Table 8: Grouped Submission – Scenario 1

Grouped Submission Scenario 1: A grouped submission for a Labeling Supplement is being		
submitted to NDA 456789, 567890, and 678901. All the new files submitted are contained in the folder for NDA 456789, sequence 0011.		
NDA 456789		
application-containing-files	true	
submission-id	0011	
submission-type attribute	fdast4 Labeling Supplement	
supplement-effective-date-type attribute	fdasedt2 (CBE-0)	
sequence-number	0011	
submission-sub-type attribute	fdasst3 (application)	
NDA 567890		
application-containing-files	false	
submission-id	0014	
submission-type attribute	fdast4 Labeling Supplement	
supplement-effective-date-type attribute	fdasedt2 (CBE-0)	
sequence-number	0014	
submission-sub-type attribute	fdasst3 (application)	
NDA 678901		
application-containing-files	false	
submission-id	0012	
submission-type attribute	fdast4 Labeling Supplement	
supplement-effective-date-type attribute	fdasedt2 (CBE-0)	
sequence-number	0012	
submission-sub-type attribute	fdasst3 (application)	

Table 9: Grouped Submission – Scenario 2

Grouped Submission Scenario 2: An amendment is being submitted to the Labeling			
Supplement previously submitted as a grouped submission. Any life cycle operations on			
files will affect all applications indicated in the application-set. All the new files submitted			
are contained in the folder for NDA 45	are contained in the folder for NDA 456789, sequence 0012.		
NDA 456789	-		
application-containing-files	true		
submission-id	0011		
submission-type attribute	fdast4 Labeling Supplement		
sequence-number	0012		
submission-sub-type attribute	fdasst4 (amendment)		
NDA 567890			
application-containing-files	false		
submission-id	0014		
submission-type attribute	fdast4 Labeling Supplement		
sequence-number	0015		
submission-sub-type attribute fdasst4 (amendment)			

false

0012

0013

fdast4 Labeling Supplement

fdasst4 (amendment)

Channel Submission Seenania 2. An amondment is being submitted to the Labeling

V. LEAF ELEMENT

submission-sub-type attribute

application-containing-files

submission-type attribute

NDA 678901

submission-id

sequence-number

Information for an individual document is contained in the *leaf* element, its attributes, and its *title* element. The *leaf* element is used repeatedly throughout the eCTD backbone files to provide individual information for each document being submitted. Detailed descriptions of each part of the *leaf* element and how to use them are found in the document, *The eCTD Backbone File Specification* for *Modules 2 through 5*. When preparing the *us-regional.xml* file, the *xlink:href* and *modified-file* leaf attributes should reflect the path relative to the location of the *us-regional.xml* file location in the submission. The following is an example of a *xlink:href* attribute and its value for the 356h.pdf in Module 1 in the same submission:

```
xlink:href="356h.pdf"
```

The following is an example of a *modified-file* leaf attribute and its value in Module 1 in an earlier submission:

```
... modified-file="../../0001/m1/us/us-regional.xml#id34567" ...
```

The following is an example of a *modified-file* leaf attribute which is modifying a leaf that was previously submitted to a different application which contained the file. The modified-file path includes the application number for the application which contained the previously submitted file and

had an *application-containing-files* element value of "true". In order to perform life cycle operations on leafs previously submitted in a grouped submission, the *modified-file* path references the application number, sequence number, and leaf id for the application where the leaf was originally submitted with the *application-containing-files* element value indicating "true."

... modified-file="../../../nda456789/0001/m1/us/us-regional.xml#id21342" ...

VI. SECTION HEADING ELEMENTS FOR MODULE 1

This section describes the heading elements relevant to Module 1. This is the equivalent to the heading elements described in the document titled, *The eCTD Backbone File Specification for Modules 2 through 5*.

The Module 1 section heading elements are listed in the DTD. For information on the placement of content in these headings, please refer to *The Comprehensive Table of Contents Headings and Hierarchy*. *Leaf* elements should only be referenced at the lowest level section/sub-section of the hierarchy for each heading element. If a section heading does not contain references to files or documents, omit the element for that heading in the eCTD backbone file.

A. M1 Regional Section Headings Requiring Attributes

Certain Module 1 heading elements require the use of an attribute to describe the information referenced in those sections. The heading elements that require an attribute are provided below:

- the *form* element under *m1-1-forms* requires an attribute indicating the *form-type* <attribute = *form-type*>
- *m1-15-promotional-material* requires an attribute to indicate the *promotional-material-audience-type* <attribute = *promotional-material-audience-type*>
- *m1-15-2-materials* requires an attribute to indicate the purpose of the promotional submission <attribute = *promotional-material-doc-type*>
- *m1-15-2-1-material* requires attributes to indicate the type of media/delivery method of the promotional material, the applicant's identifier for the material and the date of the initial dissemination of the promotional labeling or the date of initial publication for an advertisement (only provided when the *promotional-material-doc-type* is a promotional 2253 submission) attribute = *promotional-material-type*, *material-id*, and *issue-date*>.

B. M1 Forms

The *m1-1-forms* heading element contains the *form* element. When a leaf is placed under the *form* element, an attribute is required and is used to indicate the type of form being submitted. Each *form* element requires an attribute of *form-type* and the attribute should be provided as a coded value from its corresponding attribute list (*form-type.xml*). Multiple leafs can be provided for a form element in order to accommodate attachments.

The current valid codes for *form-type* are available on the FDA web site: http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.

In the example below, the *form-type* attribute indicates the coded value for the Form FDA 2253.

Table 10: Form Types and eCTD Location

Form Type	Reference Location
Form FDA 1571: Investigational New Drug Application	form element within the submission-
(IND)	information element
Form FDA 356h: Application to Market a New Drug,	form element within the submission-
Biologic, or an Antibiotic Drug for Human Use"	information element
Patent Forms (Form FDA3542a and Form FDA 3542)	m1-3-5-1-patent-information
	element within the <i>m1-3-5-patent-</i>
	and-exclusivity element
All other forms ⁵	<i>form</i> element within the <i>m1-1-forms</i>
	element

C. Module 1.15 — Promotional Material

When providing information in Module 1.15, the leaves should be referenced at the lowest heading elements. The *m1-15-promotional-material* heading element requires an attribute of *promotional-material-audience-type*. When a leaf is referenced in any subsection of Module 1.15, the attribute must be provided as a coded value from its corresponding attribute list (promotional-material-audience-type.xml). The current valid codes for *promotional-material-audience-type* are available on the FDA web site:

<u>http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.</u>

When providing information in a subsection of Module 1.15.2 Materials, three attributes are required: *promotional-material-doc-type*, *promotional-material-type*, and *material-id*. An additional optional attribute, *issue-date*, should only be provided when the *promotional-material-doc-type* is a promotional 2253 submission. The attribute *promotional-material-doc-type* should be provided with the *m1-15-2-materials* heading element and the attributes *promotional-material-type*, *material-id*, and *issue-date* (if applicable) should be provided with the *m-1-15-2-1 material* heading element. The attributes for *promotional-material-doc-type* and *promotional-material-type* should be provided as coded values from their corresponding attribute list (*promotional-material-doc-type.xml*) and *promotional-material-type.xml*). The *material-id* attribute may consist of alpha and/or numeric

⁵ Refer to the current version of the form-type.xml for a complete list of forms.

characters and should not exceed 30 characters. The *issue-date* attribute, if applicable, should follow the date format as yyyymmdd (4-digit year, 2-digit month, and 2-digit day). The current valid codes for *promotional-material-doc-type* and *promotional-material-type* are available on the FDA web site:

http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/Electronic Submissions/ucm253101.htm.

In the example below, the *promotional-material-audience-type* indicates the promotional material is intended for healthcare professionals, the *promotional-material-doc-type* indicates that the submission is a Form FDA 2253 submission, the *promotional-material-type* indicates the material being submitted is a sales aid, the *material-id* provided by the applicant is "65no35482", and the *issue-date* provided by the applicant is "20120415" (April 15, 2012 formatted as yyyymmdd).

Table 11: Promotional Material Audience Types and Descriptions

Promotional Material Audience Type	Description
Consumer	Promotional materials directed to consumers
Professional	Promotional materials directed to health care professionals

Table 12: Promotional Material Doc Types and Descriptions

Promotional Material	Description
Document Type	
Promotional 2253	Form and materials required from submitter at first publication of
	marketing and advertising materials
Request for Advisory	Voluntary submission of launch promotional materials for FDA
Launch	review and comment sent prior to dissemination/publication
Request for Advisory	Voluntary submission of promotional materials for FDA review and
Non-Launch	comment sent prior to dissemination/publication
Pre-submission	Promotional materials intended to be used in the first 120 days after
Accelerated Launch	approval that are submitted to FDA prior to

	dissemination/publication as required by 21 CFR 314.550 and 601.45
Pre-submission	Promotional materials intended to be used after the 120-day post
Accelerated Non-Launch	approval period that are submitted to FDA prior to
	dissemination/publication as required by 21 CFR 314.550 and 601.45
Pre-Dissemination	Television advertisements submitted to FDA under the Pre-
Review of Television Ads	Dissemination Review of Television Ads Program

Table 13: Material ID and Issue Date Descriptions

M1-15-2-1 Applicant Defined Attributes	Description
Material ID	The applicant's identification code or other designation of the specific promotional material. The material-id may consist of alpha and/or numeric characters and has a 30 character limitation.
Issue date	The date of the initial dissemination of the promotional labeling or the date of initial publication for an advertisement. The format of the date should be YYYYMMDD.

APPENDIX 1: M1 Document Type Definition (DTD) Version 3.3

```
<?xml version="1.0" encoding="UTF-8"?>
<!--version 3-1 Modified the m1-16 heading and added sub-headings-->
<!--version 3-2 Two additional attributes were added to the m1-15-2-1-material sub-heading-->
<!--version 3-3 Modified the m1-15-1-5 heading-->
<!ELEMENT fda-regional:fda-regional (admin, m1-regional?)>
<!ATTLIST fda-regional:fda-regional
   xmlns:fda-regional CDATA #FIXED "http://www.ich.org/fda"
   xmlns:xlink CDATA #FIXED "http://www.w3c.org/1999/xlink"
   xml:lang CDATA #IMPLIED
   dtd-version CDATA #FIXED "3.3"
<!ELEMENT leaf (title, link-text?)>
<!ATTLIST leaf
   ID ID #REQUIRED
   application-version CDATA #IMPLIED
   version CDATA #IMPLIED
   font-library CDATA #IMPLIED
   operation (delete | new | append | replace) #REQUIRED
   modified-file CDATA #IMPLIED
   checksum CDATA #IMPLIED
   checksum-type CDATA #IMPLIED
   keywords CDATA #IMPLIED
   xlink:type CDATA #FIXED "simple"
   xlink:role CDATA #IMPLIED
   xlink:href CDATA #IMPLIED
   xlink:show (embed | none | other | new | replace) #IMPLIED
   xlink:actuate (onLoad | none | other | onRequest) #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT title (#PCDATA)>
<!ATTLIST title
   ID ID #IMPLIED
<!ELEMENT link-text (#PCDATA | xref)*>
<!ATTLIST link-text
   ID ID #IMPLIED
<!ELEMENT xref EMPTY>
<!ATTLIST xref
   ID ID #IMPLIED
   xlink:type CDATA #FIXED "simple"
   xlink:role CDATA #IMPLIED
   xlink:title CDATA #REQUIRED
   xlink:href CDATA #REQUIRED
```

```
xlink:show (embed | none | other | new | replace) #IMPLIED
   xlink:actuate (onLoad | none | other | onRequest) #IMPLIED
<!ELEMENT node-extension (title, (leaf | node-extension)+)>
<!ATTLIST node-extension
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
>
<!ELEMENT admin (applicant-info, application-set)>
<!ELEMENT applicant-info (id, company-name, submission-description?, applicant-contacts)>
<!ELEMENT id (#PCDATA)>
<!ELEMENT company-name (#PCDATA)>
<!ELEMENT submission-description (#PCDATA)>
<!ELEMENT applicant-contacts (applicant-contact+)>
<!ELEMENT applicant-contact (applicant-contact-name, telephones, emails)>
<!ELEMENT applicant-contact-name (#PCDATA)>
<!ATTLIST applicant-contact-name
   applicant-contact-type CDATA #REQUIRED
<!ELEMENT telephones (telephone+)>
<!ELEMENT telephone (#PCDATA)>
<!ATTLIST telephone
   telephone-number-type CDATA #REQUIRED
<!ELEMENT emails (email+)>
<!ELEMENT email (#PCDATA)>
<!ELEMENT application-set (application+)>
<!ELEMENT application (application-information, submission-information)>
<!ATTLIST application
   application-containing-files (false | true) #REQUIRED
<!ELEMENT application-information (application-number, cross-reference-application-
number*)>
<!ELEMENT application-number (#PCDATA)>
<!ATTLIST application-number
   application-type CDATA #REOUIRED
>
<!ELEMENT cross-reference-application-number (#PCDATA)>
<!ATTLIST cross-reference-application-number
   application-type CDATA #REQUIRED
<!ELEMENT submission-information (submission-id, sequence-number, form?)>
<!ELEMENT submission-id (#PCDATA)>
<!ATTLIST submission-id
   submission-type CDATA #REQUIRED
   supplement-effective-date-type CDATA #IMPLIED
```

```
<!ELEMENT sequence-number (#PCDATA)>
<!ATTLIST sequence-number
    submission-sub-type CDATA #REQUIRED
>
<!ELEMENT form ((leaf | node-extension)*)>
<!ATTLIST form
    form-type CDATA #REQUIRED
<!ELEMENT m1-regional (m1-1-forms?, m1-2-cover-letters?, m1-3-administrative-
information?, m1-4-references?, m1-5-application-status?, m1-6-meetings?, m1-7-fast-track?,
m1-8-special-protocol-assessment-request?, m1-9-pediatric-administrative-information?, m1-10-
dispute-resolution?, m1-11-information-amendment-information-not-covered-under-modules-2-
to-5?, m1-12-other-correspondence?, m1-13-annual-report?, m1-14-labeling?, m1-15-
promotional-material?, m1-16-risk-management-plan?, m1-17-postmarketing-studies?, m1-18-
proprietary-names?, m1-19-pre-eua-and-eua?, m1-20-general-investigational-plan-for-initial-
ind?)>
<!ATTLIST m1-regional
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-1-forms (form*)>
<!ELEMENT m1-2-cover-letters ((leaf | node-extension)*)>
<!ATTLIST m1-2-cover-letters
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-administrative-information (m1-3-1-contact-sponsor-applicant-
information*, m1-3-2-field-copy-certification*, m1-3-3-debarment-certification*, m1-3-4-
financial-certification-and-disclosure*, m1-3-5-patent-and-exclusivity*, m1-3-6-tropical-disease-
priority-review-voucher*)>
<!ATTLIST m1-3-administrative-information
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-1-contact-sponsor-applicant-information (m1-3-1-1-change-of-address-or-
corporate-name*, m1-3-1-2-change-in-contact-agent*, m1-3-1-3-change-in-sponsor*, m1-3-1-4-
transfer-of-obligation*, m1-3-1-5-change-in-ownership-of-an-application-or-reissuance-of-
license*)>
<!ATTLIST m1-3-1-contact-sponsor-applicant-information
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-1-1-change-of-address-or-corporate-name ((leaf | node-extension)*)>
<!ATTLIST m1-3-1-1-change-of-address-or-corporate-name
    ID ID #IMPLIED
```

```
xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-3-1-2-change-in-contact-agent ((leaf | node-extension)*)>
<!ATTLIST m1-3-1-2-change-in-contact-agent
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-1-3-change-in-sponsor ((leaf | node-extension)*)>
<!ATTLIST m1-3-1-3-change-in-sponsor
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-1-4-transfer-of-obligation ((leaf | node-extension)*)>
<!ATTLIST m1-3-1-4-transfer-of-obligation
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-1-5-change-in-ownership-of-an-application-or-reissuance-of-license ((leaf |
node-extension)*)>
<!ATTLIST m1-3-1-5-change-in-ownership-of-an-application-or-reissuance-of-license
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-2-field-copy-certification ((leaf | node-extension)*)>
<!ATTLIST m1-3-2-field-copy-certification
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-3-3-debarment-certification ((leaf | node-extension)*)>
<!ATTLIST m1-3-3-debarment-certification
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-4-financial-certification-and-disclosure ((leaf | node-extension)*)>
<!ATTLIST m1-3-4-financial-certification-and-disclosure
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-5-patent-and-exclusivity (m1-3-5-1-patent-information*, m1-3-5-2-patent-
certification*, m1-3-5-3-exclusivity-claim*)>
<!ATTLIST m1-3-5-patent-and-exclusivity
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-5-1-patent-information ((leaf | node-extension)*)>
<!ATTLIST m1-3-5-1-patent-information
```

```
ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-3-5-2-patent-certification ((leaf | node-extension)*)>
<!ATTLIST m1-3-5-2-patent-certification
    ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-3-5-3-exclusivity-claim ((leaf | node-extension)*)>
<!ATTLIST m1-3-5-3-exclusivity-claim
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-3-6-tropical-disease-priority-review-voucher ((leaf | node-extension)*)>
<!ATTLIST m1-3-6-tropical-disease-priority-review-voucher
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-4-references (m1-4-1-letter-of-authorization*, m1-4-2-statement-of-right-of-
reference*, m1-4-3-list-of-authorized-persons-to-incorporate-by-reference*, m1-4-4-cross-
reference-to-previously-submitted-information*)>
<!ATTLIST m1-4-references
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-4-1-letter-of-authorization ((leaf | node-extension)*)>
<!ATTLIST m1-4-1-letter-of-authorization
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-4-2-statement-of-right-of-reference ((leaf | node-extension)*)>
<!ATTLIST m1-4-2-statement-of-right-of-reference
    ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-4-3-list-of-authorized-persons-to-incorporate-by-reference ((leaf | node-
extension)*)>
<!ATTLIST m1-4-3-list-of-authorized-persons-to-incorporate-by-reference
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-4-4-cross-reference-to-previously-submitted-information ((leaf | node-
extension)*)>
<!ATTLIST m1-4-4-cross-reference-to-previously-submitted-information
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
```

```
<!ELEMENT m1-5-application-status (m1-5-1-withdrawal-of-an-ind*, m1-5-2-inactivation-
request*, m1-5-3-reactivation-request*, m1-5-4-reinstatement-request*, m1-5-5-withdrawal-of-
an-unapproved-bla-nda-anda-or-supplement*, m1-5-6-withdrawal-of-listed-drug*, m1-5-7-
withdrawal-of-approval-of-an-application-or-revocation-of-license*)>
<!ATTLIST m1-5-application-status
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-5-1-withdrawal-of-an-ind ((leaf | node-extension)*)>
<!ATTLIST m1-5-1-withdrawal-of-an-ind
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-5-2-inactivation-request ((leaf | node-extension)*)>
<!ATTLIST m1-5-2-inactivation-request
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-5-3-reactivation-request ((leaf | node-extension)*)>
<!ATTLIST m1-5-3-reactivation-request
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-5-4-reinstatement-request ((leaf | node-extension)*)>
<!ATTLIST m1-5-4-reinstatement-request
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-5-5-withdrawal-of-an-unapproved-bla-nda-anda-or-supplement ((leaf | node-
extension)*)>
<!ATTLIST m1-5-5-withdrawal-of-an-unapproved-bla-nda-anda-or-supplement
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-5-6-withdrawal-of-listed-drug ((leaf | node-extension)*)>
<!ATTLIST m1-5-6-withdrawal-of-listed-drug
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-5-7-withdrawal-of-approval-of-an-application-or-revocation-of-license ((leaf |
node-extension)*)>
<!ATTLIST m1-5-7-withdrawal-of-approval-of-an-application-or-revocation-of-license
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
```

```
<!ELEMENT m1-6-meetings (m1-6-1-meeting-request*, m1-6-2-meeting-background-
materials*, m1-6-3-correspondence-regarding-meetings*)>
<!ATTLIST m1-6-meetings
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-6-1-meeting-request ((leaf | node-extension)*)>
<!ATTLIST m1-6-1-meeting-request
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-6-2-meeting-background-materials ((leaf | node-extension)*)>
<!ATTLIST m1-6-2-meeting-background-materials
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-6-3-correspondence-regarding-meetings ((leaf | node-extension)*)>
<!ATTLIST m1-6-3-correspondence-regarding-meetings
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-7-fast-track (m1-7-1-fast-track-designation-request*, m1-7-2-fast-track-
designation-withdrawal-request*, m1-7-3-rolling-review-request*, m1-7-4-correspondence-
regarding-fast-track-rolling-review*)>
<!ATTLIST m1-7-fast-track
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-7-1-fast-track-designation-request ((leaf | node-extension)*)>
<!ATTLIST m1-7-1-fast-track-designation-request
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-7-2-fast-track-designation-withdrawal-request ((leaf | node-extension)*)>
<!ATTLIST m1-7-2-fast-track-designation-withdrawal-request
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-7-3-rolling-review-request ((leaf | node-extension)*)>
<!ATTLIST m1-7-3-rolling-review-request
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-7-4-correspondence-regarding-fast-track-rolling-review ((leaf | node-
extension)*)>
<!ATTLIST m1-7-4-correspondence-regarding-fast-track-rolling-review
```

```
ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-8-special-protocol-assessment-request (m1-8-1-clinical-study*, m1-8-2-
carcinogenicity-study*, m1-8-3-stability-study*, m1-8-4-animal-efficacy-study-for-approval-
under-the-animal-rule*)>
<!ATTLIST m1-8-special-protocol-assessment-request
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-8-1-clinical-study ((leaf | node-extension)*)>
<!ATTLIST m1-8-1-clinical-study
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-8-2-carcinogenicity-study ((leaf | node-extension)*)>
<!ATTLIST m1-8-2-carcinogenicity-study
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-8-3-stability-study ((leaf | node-extension)*)>
<!ATTLIST m1-8-3-stability-study
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-8-4-animal-efficacy-study-for-approval-under-the-animal-rule ((leaf | node-
extension)*)>
<!ATTLIST m1-8-4-animal-efficacy-study-for-approval-under-the-animal-rule
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-9-pediatric-administrative-information (m1-9-1-request-for-waiver-of-
pediatric-studies*, m1-9-2-request-for-deferral-of-pediatric-studies*, m1-9-3-request-for-
pediatric-exclusivity-determination*, m1-9-4-proposed-pediatric-study-request-and-
amendments*, m1-9-6-other-correspondence-regarding-pediatric-exclusivity-or-study-plans*)>
<!ATTLIST m1-9-pediatric-administrative-information
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-9-1-request-for-waiver-of-pediatric-studies ((leaf | node-extension)*)>
<!ATTLIST m1-9-1-request-for-waiver-of-pediatric-studies
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-9-2-request-for-deferral-of-pediatric-studies ((leaf | node-extension)*)>
<!ATTLIST m1-9-2-request-for-deferral-of-pediatric-studies
```

```
ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-9-3-request-for-pediatric-exclusivity-determination ((leaf | node-extension)*)>
<!ATTLIST m1-9-3-request-for-pediatric-exclusivity-determination
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-9-4-proposed-pediatric-study-request-and-amendments ((leaf | node-
extension)*)>
<!ATTLIST m1-9-4-proposed-pediatric-study-request-and-amendments
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-9-6-other-correspondence-regarding-pediatric-exclusivity-or-study-plans ((leaf
| node-extension)*)>
<!ATTLIST m1-9-6-other-correspondence-regarding-pediatric-exclusivity-or-study-plans
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-10-dispute-resolution (m1-10-1-request-for-dispute-resolution*, m1-10-2-
correspondence-related-to-dispute-resolution*)>
<!ATTLIST m1-10-dispute-resolution
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-10-1-request-for-dispute-resolution ((leaf | node-extension)*)>
<!ATTLIST m1-10-1-request-for-dispute-resolution
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-10-2-correspondence-related-to-dispute-resolution ((leaf | node-extension)*)>
<!ATTLIST m1-10-2-correspondence-related-to-dispute-resolution
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-11-information-amendment-information-not-covered-under-modules-2-to-5
(m1-11-1-quality-information-amendment*, m1-11-2-nonclinical-information-amendment*, m1-
11-3-clinical-information-amendment*, m1-11-4-multiple-module-information-amendment*)>
<!ATTLIST m1-11-information-amendment-information-not-covered-under-modules-2-to-5
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-11-1-quality-information-amendment ((leaf | node-extension)*)>
<!ATTLIST m1-11-1-quality-information-amendment
    ID ID #IMPLIED
```

```
xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-11-2-nonclinical-information-amendment ((leaf | node-extension)*)>
<!ATTLIST m1-11-2-nonclinical-information-amendment
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-11-3-clinical-information-amendment ((leaf | node-extension)*)>
<!ATTLIST m1-11-3-clinical-information-amendment
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-11-4-multiple-module-information-amendment ((leaf | node-extension)*)>
<!ATTLIST m1-11-4-multiple-module-information-amendment
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-other-correspondence (m1-12-1-pre-ind-correspondence*, m1-12-2-
request-to-charge-for-clinical-trial*, m1-12-3-request-to-charge-for-expanded-access*, m1-12-4-
request-for-comments-and-advice*, m1-12-5-request-for-a-waiver*, m1-12-6-exception-from-
informed-consent-for-emergency-research*, m1-12-7-public-disclosure-statement-for-exception-
from-informed-consent-for-emergency-research*, m1-12-8-correspondence-regarding-exception-
from-informed-consent-for-emergency-research*, m1-12-9-notification-of-discontinuation-of-
clinical-trial*, m1-12-10-generic-drug-enforcement-act-statement*, m1-12-11-anda-basis-for-
submission-statement*, m1-12-12-comparison-of-generic-drug-and-reference-listed-drug*, m1-
12-13-request-for-waiver-for-in-vivo-studies*, m1-12-14-environmental-analysis*, m1-12-15-
request-for-waiver-of-in-vivo-bioavailability-studies*, m1-12-16-field-alert-reports*, m1-12-17-
orphan-drug-designation*)>
<!ATTLIST m1-12-other-correspondence
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-1-pre-ind-correspondence ((leaf | node-extension)*)>
<!ATTLIST m1-12-1-pre-ind-correspondence
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-12-2-request-to-charge-for-clinical-trial ((leaf | node-extension)*)>
<!ATTLIST m1-12-2-request-to-charge-for-clinical-trial
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-3-request-to-charge-for-expanded-access ((leaf | node-extension)*)>
<!ATTLIST m1-12-3-request-to-charge-for-expanded-access
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
```

```
<!ELEMENT m1-12-4-request-for-comments-and-advice ((leaf | node-extension)*)>
<!ATTLIST m1-12-4-request-for-comments-and-advice
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-5-request-for-a-waiver ((leaf | node-extension)*)>
<!ATTLIST m1-12-5-request-for-a-waiver
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-12-6-exception-from-informed-consent-for-emergency-research ((leaf | node-
extension)*)>
<!ATTLIST m1-12-6-exception-from-informed-consent-for-emergency-research
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-7-public-disclosure-statement-for-exception-from-informed-consent-for-
emergency-research ((leaf | node-extension)*)>
<!ATTLIST m1-12-7-public-disclosure-statement-for-exception-from-informed-consent-for-
emergency-research
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-8-correspondence-regarding-exception-from-informed-consent-for-
emergency-research ((leaf | node-extension)*)>
<!ATTLIST m1-12-8-correspondence-regarding-exception-from-informed-consent-for-
emergency-research
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-12-9-notification-of-discontinuation-of-clinical-trial ((leaf | node-
extension)*)>
<!ATTLIST m1-12-9-notification-of-discontinuation-of-clinical-trial
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-12-10-generic-drug-enforcement-act-statement ((leaf | node-extension)*)>
<!ATTLIST m1-12-10-generic-drug-enforcement-act-statement
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-11-anda-basis-for-submission-statement ((leaf | node-extension)*)>
<!ATTLIST m1-12-11-anda-basis-for-submission-statement
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
```

```
<!ELEMENT m1-12-12-comparison-of-generic-drug-and-reference-listed-drug ((leaf | node-
extension)*)>
<!ATTLIST m1-12-12-comparison-of-generic-drug-and-reference-listed-drug
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-13-request-for-waiver-for-in-vivo-studies ((leaf | node-extension)*)>
<!ATTLIST m1-12-13-request-for-waiver-for-in-vivo-studies
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-14-environmental-analysis ((leaf | node-extension)*)>
<!ATTLIST m1-12-14-environmental-analysis
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-15-request-for-waiver-of-in-vivo-bioavailability-studies ((leaf | node-
extension)*)>
<!ATTLIST m1-12-15-request-for-waiver-of-in-vivo-bioavailability-studies
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-12-16-field-alert-reports ((leaf | node-extension)*)>
<!ATTLIST m1-12-16-field-alert-reports
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-12-17-orphan-drug-designation ((leaf | node-extension)*)>
<!ATTLIST m1-12-17-orphan-drug-designation
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-annual-report (m1-13-1-summary-for-nonclinical-studies*, m1-13-2-
summary-of-clinical-pharmacology-information*, m1-13-3-summary-of-safety-information*,
m1-13-4-summary-of-labeling-changes*, m1-13-5-summary-of-manufacturing-changes*, m1-
13-6-summary-of-microbiological-changes*, m1-13-7-summary-of-other-significant-new-
information*, m1-13-8-individual-study-information*, m1-13-9-general-investigational-plan*,
m1-13-10-foreign-marketing*, m1-13-11-distribution-data*, m1-13-12-status-of-postmarketing-
study-commitments-and-requirements*, m1-13-13-status-of-other-postmarketing-studies-and-
requirements*, m1-13-14-log-of-outstanding-regulatory-business*, m1-13-15-development-
safety-update-report-dsur*)>
<!ATTLIST m1-13-annual-report
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
```

```
<!ELEMENT m1-13-1-summary-for-nonclinical-studies ((leaf | node-extension)*)>
<!ATTLIST m1-13-1-summary-for-nonclinical-studies
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-13-2-summary-of-clinical-pharmacology-information ((leaf | node-
extension)*)>
<!ATTLIST m1-13-2-summary-of-clinical-pharmacology-information
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-13-3-summary-of-safety-information ((leaf | node-extension)*)>
<!ATTLIST m1-13-3-summary-of-safety-information
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-4-summary-of-labeling-changes ((leaf | node-extension)*)>
<!ATTLIST m1-13-4-summary-of-labeling-changes
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-5-summary-of-manufacturing-changes ((leaf | node-extension)*)>
<!ATTLIST m1-13-5-summary-of-manufacturing-changes
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-6-summary-of-microbiological-changes ((leaf | node-extension)*)>
<!ATTLIST m1-13-6-summary-of-microbiological-changes
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-7-summary-of-other-significant-new-information ((leaf | node-</p>
extension)*)>
<!ATTLIST m1-13-7-summary-of-other-significant-new-information
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-8-individual-study-information ((leaf | node-extension)*)>
<!ATTLIST m1-13-8-individual-study-information
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-9-general-investigational-plan ((leaf | node-extension)*)>
<!ATTLIST m1-13-9-general-investigational-plan
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
```

```
<!ELEMENT m1-13-10-foreign-marketing ((leaf | node-extension)*)>
<!ATTLIST m1-13-10-foreign-marketing
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-11-distribution-data ((leaf | node-extension)*)>
<!ATTLIST m1-13-11-distribution-data
    ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-13-12-status-of-postmarketing-study-commitments-and-requirements ((leaf |
node-extension)*)>
<!ELEMENT m1-13-13-status-of-other-postmarketing-studies-and-requirements ((leaf | node-
extension)*)>
<!ATTLIST m1-13-13-status-of-other-postmarketing-studies-and-requirements
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-14-log-of-outstanding-regulatory-business ((leaf | node-extension)*)>
<!ATTLIST m1-13-14-log-of-outstanding-regulatory-business
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-13-15-development-safety-update-report-dsur ((leaf | node-extension)*)>
<!ATTLIST m1-13-15-development-safety-update-report-dsur
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-labeling (m1-14-1-draft-labeling*, m1-14-2-final-labeling*, m1-14-3-
listed-drug-labeling*, m1-14-4-investigational-drug-labeling*, m1-14-5-foreign-labeling*, m1-
14-6-product-labeling-for-2253-submissions*)>
<!ATTLIST m1-14-labeling
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-1-draft-labeling (m1-14-1-draft-carton-and-container-labels*, m1-14-1-
2-annotated-draft-labeling-text*, m1-14-1-3-draft-labeling-text*, m1-14-1-4-label-
comprehension-studies*, m1-14-1-5-labeling-history*)>
<!ATTLIST m1-14-1-draft-labeling
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-1-1-draft-carton-and-container-labels ((leaf | node-extension)*)>
<!ATTLIST m1-14-1-1-draft-carton-and-container-labels
    ID ID #IMPLIED
```

```
xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-14-1-2-annotated-draft-labeling-text ((leaf | node-extension)*)>
<!ATTLIST m1-14-1-2-annotated-draft-labeling-text
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-1-3-draft-labeling-text ((leaf | node-extension)*)>
<!ATTLIST m1-14-1-3-draft-labeling-text
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-1-4-label-comprehension-studies ((leaf | node-extension)*)>
<!ATTLIST m1-14-1-4-label-comprehension-studies
    ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-1-5-labeling-history ((leaf | node-extension)*)>
<!ATTLIST m1-14-1-5-labeling-history
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-2-final-labeling (m1-14-2-1-final-carton-or-container-labels*, m1-14-2-2-
final-package-insert-package-inserts-patient-information-medication-guides*, m1-14-2-3-final-
labeling-text*)>
<!ATTLIST m1-14-2-final-labeling
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-2-1-final-carton-or-container-labels ((leaf | node-extension)*)>
<!ATTLIST m1-14-2-1-final-carton-or-container-labels
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-14-2-2-final-package-insert-package-inserts-patient-information-medication-
guides ((leaf | node-extension)*)>
<!ATTLIST m1-14-2-2-final-package-insert-package-inserts-patient-information-medication-
guides
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-2-3-final-labeling-text ((leaf | node-extension)*)>
<!ATTLIST m1-14-2-3-final-labeling-text
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
```

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<!ELEMENT m1-14-3-listed-drug-labeling (m1-14-3-1-annotated-comparison-with-listed-
drug*, m1-14-3-2-approved-labeling-text-for-listed-drug*, m1-14-3-3-labeling-text-for-
reference-listed-drug*)>
<!ATTLIST m1-14-3-listed-drug-labeling
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-3-1-annotated-comparison-with-listed-drug ((leaf | node-extension)*)>
<!ATTLIST m1-14-3-1-annotated-comparison-with-listed-drug
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-3-2-approved-labeling-text-for-listed-drug ((leaf | node-extension)*)>
<!ATTLIST m1-14-3-2-approved-labeling-text-for-listed-drug
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-3-3-labeling-text-for-reference-listed-drug ((leaf | node-extension)*)>
<!ATTLIST m1-14-3-3-labeling-text-for-reference-listed-drug
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-4-investigational-drug-labeling (m1-14-4-1-investigational-brochure*, m1-
14-4-2-investigational-drug-labeling*)>
<!ATTLIST m1-14-4-investigational-drug-labeling
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-14-4-1-investigational-brochure ((leaf | node-extension)*)>
<!ATTLIST m1-14-4-1-investigational-brochure
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-4-2-investigational-drug-labeling ((leaf | node-extension)*)>
<!ATTLIST m1-14-4-2-investigational-drug-labeling
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-5-foreign-labeling ((leaf | node-extension)*)>
<!ATTLIST m1-14-5-foreign-labeling
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-14-6-product-labeling-for-2253-submissions ((leaf | node-extension)*)>
<!ATTLIST m1-14-6-product-labeling-for-2253-submissions
    ID ID #IMPLIED
```

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xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-15-promotional-material (m1-15-1-correspondence-relating-to-promotional-
materials?, m1-15-2-materials?)>
<!ATTLIST m1-15-promotional-material
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
    promotional-material-audience-type CDATA #REQUIRED
<!ELEMENT m1-15-1-correspondence-relating-to-promotional-materials (m1-15-1-1-request-
for-advisory-comments-on-launch-materials?, m1-15-1-2-request-for-advisory-comments-on-
non-launch-materials?, m1-15-1-3-pre-submission-of-launch-promotional-materials-for-
accelerated-approval-products?, m1-15-1-4-pre-submission-of-non-launch-promotional-
materials-for-accelerated-approval-products?, m1-15-1-5-pre-dissemination-review-of-
television-ads?, m1-15-1-6-response-to-untitled-letter-or-warning-letter?, m1-15-1-7-response-
to-information-request?, m1-15-1-8-correspondence-accompanying-materials-previously-
missing-or-rejected?, m1-15-1-9-withdrawal-request?, m1-15-1-10-submission-of-annotated-
references?, m1-15-1-11-general-correspondence?)>
<!ATTLIST m1-15-1-correspondence-relating-to-promotional-materials
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-1-1-request-for-advisory-comments-on-launch-materials ((leaf | node-
extension)*)>
<!ATTLIST m1-15-1-1-request-for-advisory-comments-on-launch-materials
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-15-1-2-request-for-advisory-comments-on-non-launch-materials ((leaf | node-
extension)*)>
<!ATTLIST m1-15-1-2-request-for-advisory-comments-on-non-launch-materials
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-15-1-3-pre-submission-of-launch-promotional-materials-for-accelerated-
approval-products ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-3-pre-submission-of-launch-promotional-materials-for-accelerated-
approval-products
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-1-4-pre-submission-of-non-launch-promotional-materials-for-accelerated-
approval-products ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-4-pre-submission-of-non-launch-promotional-materials-for-accelerated-
approval-products
    ID ID #IMPLIED
```

```
xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-15-1-5-pre-dissemination-review-of-television-ads ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-5-pre-dissemination-review-of-television-ads
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-1-6-response-to-untitled-letter-or-warning-letter ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-6-response-to-untitled-letter-or-warning-letter
    ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-1-7-response-to-information-request ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-7-response-to-information-request
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-1-8-correspondence-accompanying-materials-previously-missing-or-
rejected ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-8-correspondence-accompanying-materials-previously-missing-or-rejected
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-1-9-withdrawal-request ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-9-withdrawal-request
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-15-1-10-submission-of-annotated-references ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-10-submission-of-annotated-references
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-1-11-general-correspondence ((leaf | node-extension)*)>
<!ATTLIST m1-15-1-11-general-correspondence
   ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-2-materials (m1-15-2-1-material*)>
<!ATTLIST m1-15-2-materials
    ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
    promotional-material-doc-type CDATA #REQUIRED
<!ELEMENT m1-15-2-1-material (m1-15-2-1-1-clean-version?, m1-15-2-1-2-annotated-
version?, m1-15-2-1-3-annotated-labeling-version?, m1-15-2-1-4-annotated-references?)>
```

```
<!ATTLIST m1-15-2-1-material
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
   promotional-material-type CDATA #REQUIRED
   material-id CDATA #REOUIRED
   issue-date CDATA #IMPLIED
<!ELEMENT m1-15-2-1-1-clean-version ((leaf | node-extension)*)>
<!ATTLIST m1-15-2-1-1-clean-version
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-2-1-2-annotated-version ((leaf | node-extension)*)>
<!ATTLIST m1-15-2-1-2-annotated-version
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-2-1-3-annotated-labeling-version ((leaf | node-extension)*)>
<!ATTLIST m1-15-2-1-3-annotated-labeling-version
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-15-2-1-4-annotated-references ((leaf | node-extension)*)>
<!ATTLIST m1-15-2-1-4-annotated-references
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-risk-management-plan (m1-16-1-risk-management-non-rems?, m1-16-2-
risk-evaluation-and-mitigation-strategies-rems?)>
<!ATTLIST m1-16-risk-management-plan
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-1-risk-management-non-rems ((leaf | node-extension)*)>
<!ATTLIST m1-16-1-risk-management-non-rems
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-2-risk-evaluation-and-mitigation-strategies-rems (m1-16-2-1-final-rems?,
m1-16-2-2-draft-rems?, m1-16-2-3-rems-assessment?, m1-16-2-4-rems-assessment-
methodology?, m1-16-2-5-rems-correspondence?, m1-16-2-6-rems-modification-history?)>
<!ATTLIST m1-16-2-risk-evaluation-and-mitigation-strategies-rems
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-2-1-final-rems ((leaf | node-extension)*)>
```

```
<!ATTLIST m1-16-2-1-final-rems
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-2-2-draft-rems ((leaf | node-extension)*)>
<!ATTLIST m1-16-2-2-draft-rems
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-2-3-rems-assessment ((leaf | node-extension)*)>
<!ATTLIST m1-16-2-3-rems-assessment
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-2-4-rems-assessment-methodology ((leaf | node-extension)*)>
<!ATTLIST m1-16-2-4-rems-assessment-methodology
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-2-5-rems-correspondence ((leaf | node-extension)*)>
<!ATTLIST m1-16-2-5-rems-correspondence
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-16-2-6-rems-modification-history ((leaf | node-extension)*)>
<!ATTLIST m1-16-2-6-rems-modification-history
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-17-postmarketing-studies (m1-17-1-correspondence-regarding-postmarketing-
commitments*, m1-17-2-correspondence-regarding-postmarketing-requirements*)>
<!ATTLIST m1-17-postmarketing-studies
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-17-1-correspondence-regarding-postmarketing-commitments ((leaf | node-
extension)*)>
<!ATTLIST m1-17-1-correspondence-regarding-postmarketing-commitments
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
<!ELEMENT m1-17-2-correspondence-regarding-postmarketing-requirements ((leaf | node-
extension)*)>
<!ATTLIST m1-17-2-correspondence-regarding-postmarketing-requirements
   ID ID #IMPLIED
   xml:lang CDATA #IMPLIED
```

```
<!ELEMENT m1-18-proprietary-names ((leaf | node-extension)*)>
<!ATTLIST m1-18-proprietary-names
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-19-pre-eua-and-eua ((leaf | node-extension)*)>
<!ATTLIST m1-19-pre-eua-and-eua
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
<!ELEMENT m1-20-general-investigational-plan-for-initial-ind ((leaf | node-extension)*)>
<!ATTLIST m1-20-general-investigational-plan-for-initial-ind
    ID ID #IMPLIED
    xml:lang CDATA #IMPLIED
>
```

APPENDIX 2: Summary of Changes for Versions of The eCTD Backbone Files Specification for Module 1

A. Summary of Changes for Version 2.3

- 1. References to 503B were modified and/or replaced with Pre-dissemination review of television ads due to re-designation of 503B to 503C (21 USC 353c). The updated sections are listed below:
 - a. The description of 'Resubmission' in Table 4 (Submission Sub-Types and Descriptions of Use).
 - b. The promotional material doc type and its description in Table 12 (Promotional Material Doc Types and Descriptions).
- 2. Changed DTD version references from 3.2 to 3.3 where applicable and replaced the copy of DTD Version 3.2 in Appendix I with DTD Version 3.3.

B. Summary of Changes for Version 2.2

- 3. Changed DTD version references from 3.1 to 3.2 where applicable and replaced the copy of DTD Version 3.1 in Appendix I with DTD Version 3.2.
- **4.** Revised text, revised table 1, and added table 13 to indicate the new required attribute *material-id* and the new optional attribute *issue-date* which applies to m1-15-2-1.

C. Summary of Changes for Version 2.1

- 1. Changed DTD version references from 3.0 to 3.1 and replaced the copy of DTD Version 3.0 in Appendix I with DTD Version 3.1.
 - a. Version 3.1 of the DTD includes changes to the m1-16 heading and m1-16 subheadings were added.

D. Summary of Changes for Version 2.0

The following is a brief summary of the changes incorporated in version 2.0 of the Module 1 Backbone Files Specification. Please refer to specific sections within this document to obtain a more detailed description of the changes. The changes made are consistent with eCTD v4, to be implemented using the Regulated Product Submission (RPS) exchange standard.

- **1.** The *date-of-submission* and *product-information* elements were removed.
- 2. Module 1 heading 1.9.5 "Proposal for written agreement" was removed. If leaves were previously referenced under a heading element that was removed, lifecycle operators can still be used to delete the leaves. No "new" or "replaced" leaves should be referenced under removed heading elements.
- 3. An *id* element was added under *applicant-info* to provide the applicant's or sponsor's corporate DUNS number issued by Dunn & Bradstreet to supplement other identifiers such as the *company-name* element.

- **4.** The *submission-description* element was added and is optional. The element is limited to 128 characters. It allows for an additional brief description of the purpose of the submission, but should not contain any reviewable information.
- 5. The *applicant-contacts* element was added to capture contact information. One or more contact names, telephone numbers, and email addresses may be submitted for each submission, and at least one contact name is required.
- 6. The *application-set* element can contain one or many applications (i.e., grouped submission). Each application needs to have its own submission information section. When a grouped submission is submitted, the submission content will reside under a single application, but is referenced by multiple eCTD applications. The *application-contains-files* element was added to indicate which application contains the files in a grouped submission. This attribute will be used to identify the root application where the submission files will be stored.
- 7. The element *cross-reference-application-number* was added to provide the ability to list cross-referenced applications. An example is an ANDA referencing a DMF; the ANDA submission would reference the application type (DMF) and application number (DMF number) in the *cross-reference-application-number* element.
- **8.** A new *submission-information* element has been introduced to group information about the submission. The *submission-information* element contains three elements (*submission-id*, *sequence-number*, and *form*).
- **9.** Certain forms are provided under the *submission-information* element to allow each application's form to be displayed within the appropriate application.
- 10. Submission type was changed from an element to be an attribute of the *submission-id* element. In addition, an attribute of *supplement-effective-date-type* was added and is also an attribute of the *submission-id* element. The *supplement-effective-date-type* is only applicable if the *submission-type* is an efficacy, labeling or CMC supplement and the *submission-sub-type* is "application."
- 11. The *sequence-number* element was relocated under the *submission-information* element to group similar elements with information about the submission.
- **12.** An attribute for *submission-sub-type* was added to more accurately reflect the nature of a submission and its relationship to the associated regulatory activity.
- **13.** Submissions are grouped with their regulatory activity by using the *submission-type*, *submission-id*, and *sequence-number*.

Example #1: The Original Application regulatory activity below has two presubmissions, the		
original application submission, and two amendments.		
New Module 1		Old Module 1
Presubmission (meeting request)		
application-containing files	true	
submission-id	0001	
submission-type attribute	fdast1 (Original Application)	Sequence: 0000
sequence-number	0001	Related Sequence: Null
submission-sub-type attribute	fdasst2 (presubmission)	
Presubmission (meeting briefing		

package)		
application-containing files	true	
submission-id	0001	
submission-type attribute	fdast1 (Original Application)	Sequence: 0001
sequence-number	0002	Related Sequence: Null
submission-sub-type attribute	fdasst2 (presubmission)	
Original Application		
application-containing files	true	
submission-id	0001	
submission-type attribute	fdast1 (Original Application)	Sequence: 0002
sequence-number	0003	Related Sequence: Null
submission-sub-type attribute	fdasst3 (application)	
Amendment #1		
application-containing files	true	
submission-id	0001	
submission-type attribute	fdast1 (Original Application)	Sequence: 0003
sequence-number	0004	Related Sequence: 0002
submission-sub-type attribute	fdasst4 (amendment)	
Amendment #2		
application-containing files	true	
submission-id	0001	
submission-type attribute	fdast1 (Original Application)	Sequence: 0004
sequence-number	0005	Related Sequence: 0002
submission-sub-type attribute	fdasst4 (amendment)	

Example #2: The Efficacy Supplement regulatory activity below has the supplement submission			
and two amendments.			
New Module 1		Old Module 1	
Efficacy Supplement (new indication)			
application-containing files	true		
submission-id	0006		
submission-type attribute	fdast2 (Efficacy Supplement)		
supplement-effective-date-type attribute	fdasedt1 (Prior Approval		
	Supplement (PAS))		
sequence-number	0006	Sequence: 0006	
submission-sub-type attribute	fdasst3 (application)	Related Sequence: Null	
Amendment #1 to Efficacy			
Supplement			
application-containing files	true		
submission-id	0006		
submission-type attribute	fdast2 (Efficacy Supplement)		
sequence-number	0008	Sequence: 0008	
submission-sub-type attribute	fdasst3 (amendment)	Related Sequence: 0006	
Amendment #2 to Efficacy			
Supplement			
application-containing files	true		
submission-id	0006		
submission-type attribute	fdast2 (Efficacy Supplement)		
sequence-number	0010	Sequence: 0010	

submission-sub-type attribute fdasst3 (amendment) Related Sequence: 0006

- **14.** Certain admin and module 1 elements (*m1-1-forms* and the sections and subsections of *m1-15-promotional-material*) require an attribute.
- **15.** Additional headings elements were added to *1.15 Promotional material* to further define the submission of promotional materials.
- **16.** Additional heading elements were added or revised. Please refer to the *The Comprehensive Table of Contents Headings and Hierarchy* for the complete set of changes.
- 17. The *us-regional.xml* refers to and validates from supporting and required files (DTD, stylesheet, and value-type lists) located at web site addresses instead of local file paths (previously required files were located in the util folder). The stylesheet (*us-regional.xsl*) was updated to refer to the new attribute value lists (XML files) and DTD for the purpose of validation and display.
- **18.** The heading table was removed from the *Heading Elements for Module 1* section.

Specifications for File Format Types Using eCTD Specifications

Specifications for File Format Types Using eCTD Specifications

Revision History

Date	Version	Summary of Changes
2013-04-11	1.0	Initial version

Specifications for File Format Types Using eCTD Specifications

This document provides specifications for submitting file format types using eCTD specifications. A list of accepted file types, and the eCTD locations in which those file types are permissible are provided. The file types in the tables below may be provided only in the specific sections listed.

I. General Information

Documents should be provided in PDF searchable format. Images (e.g., BMP, JPG, GIF, PNG) should be rendered into PDF format and retain searchable text whenever possible. When this isn't possible, please refer to the tables below. Additional information related to PDF documents is available in the FDA technical specification FDA Portable Document Format (PDF) Specifications.

II. Acceptable File Formats for Use in eCTD Module 1

Documents and	Format Name/Description	Accepted in eCTD Modules/Headings
Labeling		
DOC	Microsoft Word document	m1-14 sub-sections
DOCX	Office Open XML document	m1-14 sub-sections
XML	Extensible Markup Language	m1\us\[labeling\spl]
GIF	Graphic Interchange Format (CompuServe	m1-14 and m1-15 sub-sections
	Bitmap)	
JPG, JPEG	JPEG Image File	m1-14 and m1-15 sub-sections
PNG	Portable Network Graphics Bitmap	m1-14 and m1-15 sub-sections

Audio	Format Name/Description	Accepted in eCTD
format		Modules/Headings
AU	Music File (various, usually Sun or UNIX)	m1-15 sub-sections
MP2	MPEG Audio Stream, Layer II (MIME video	m1-15 sub-sections
	file)	
MP3	MPEG Audio Stream, Layer III	m1-15 sub-sections
MP4	MPEG-4 Video File	m1-15 sub-sections
WAV	Windows Waveform Sound	m1-15 sub-sections
WMA	Windows Media File (contains audio)	m1-15 sub-sections

Video	Format Name/Description	Accepted in eCTD
format		Modules/Headings
AVI	Audio Video Interleave File	m1-15 sub-sections
FLV	Flash Video	m1-15 sub-sections
MPEG	Moving Picture Experts Group (MPEG	m1-15 sub-sections
	Movie)	
SWF	Macromedia Flash (for viewing)	m1-15 sub-sections

Video format	Format Name/Description	Accepted in eCTD Modules/Headings
WMV	Windows Media File (contains both video and audio)	m1-15 sub-sections

Images	Format Name/Description	Accepted in eCTD
		Modules/Headings
BMP	Windows or OS/2 Bitmap Graphics	m1-15 sub-sections
GIF	Graphic Interchange Format (CompuServe	m1-15 sub-sections
	Bitmap)	
JPG, JPEG	JPEG Image File	m1-15 sub-sections
PNG	Portable Network Graphics Bitmap	m1-15 sub-sections

Web	Format Name/Description	Accepted in eCTD
format		Modules/Headings
HTM,	HyperText Markup Language	m1-15 sub-sections
HTML		
Flash and	Macromedia Flash Source File	m1-15 sub-sections
Shockwave		
(.f4v, .fla,	Macromedia Shockwave Flash Format	
.flv, .swf)		

III. eCTD Modules 2 through 5

File Types	Format Name/Description	eCTD Module/Section
CSS	Cascading Style Sheets	m4, m5 (CDISC metadata)
DAT	Data File	m4, m5 (data)
GIF	CompuServe's Graphics Interchange Format	m2-m5
JPG	Joint Photographic Group	m2-m5
PNG	Portable Network Graphics Bitmap	m2-m5
SVG	Scalable Vector Graphics	m2-m5
TXT	Text Document File	m3 - m5 (data)
XML	Extensible Markup Language	m4, m5 (CDISC metadata)
XPT	SAS Transport File	m3 - m5 (data)
XSD	XML Schema	m4, m5 (CDISC metadata)
XSL	Extensible Stylesheet Language (XML	m4, m5 (CDISC metadata)
	Stylesheet)	

IV. Supportive Required File Formats

eCTD	Format Name/Description	eCTD Folder Location or
Supportive		Module/Section Referencing File
Required		Formats
DTD	Data Type Definition	[sequence number folder]\util\dtd
		folder
XSL	Extensible Stylesheet Language (XML	[sequence number folder]\util\style
	Stylesheet)	folder
XML	Extensible Markup Language	[sequence number folder], m1, m5

References:

References are available on the eCTD Web Page:

http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/ucm153574.htm.

ICH M2 EWG technical specification, Electronic Common Technical Document Specification

FDA Guidance for Industry, Providing Regulatory Submissions in Electronic Format — Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications

Portable Document Format (PDF) Specifications

Study Data Specifications

eCTD Backbone Files Specification for Module 1 (versions 1.3 and 2.1)

eCTD Backbone File Specification for Modules 2 through 5 3.2.2

The eCTD Backbone File Specification for Study Tagging Files 2.6.1

Questions may be sent to:

CDER: ESUB@fda.hhs.gov

CBER: ESUBPREP@fda.hhs.gov

Data-related questions: eDATA@fda.hhs.gov

Specification for Transmitting Electronic Submissions using eCTD Specifications

Revision History

Date	Version	Summary of Changes	
2005-05-25	1.0	Original version	
2005-06-14	1.1	Correction of typographical error in Type of Media table	
2009-08-27	1.2	Removal of Media Type Floppy Disk	
		Updated LTO specifications	
		Added information regarding ESG	
2010-08-02	1.3	Change to Address for electronic submission sent on physical	
		media	
		CDER Office of Generic Drugs address change	
2011-12-28	1.4	Added information regarding USB media format	
		Added retirement date for Tape options	
		Added email address for Questions/Communication with Centers	
2012-07-26	1.5	Clarification that USB encryption is optional	
		Rewording information regarding password protection of data vs.	
		USB drive	

Specification for Transmitting Electronic Submissions using eCTD Specifications

This document provides specification for transmitting electronic submissions using eCTD specifications. Details are included for transmitting the electronic submission on physical media or electronically.

I. ELECTRONIC TRANSMISSION

FDA prefers to receive submissions via the Electronic Secure Gateway (ESG) rather than on physical media. Whenever possible, please use the ESG. See http://www.fda.gov/ForIndustry/ElectronicSubmissionsGateway/default.htm for more information.

II. PHYSICAL MEDIA

A. Address for electronic submissions sent on physical media

CBER:

U.S. Food and Drug Administration Center for Biologics Evaluation and Research Document Control Center 1401 Rockville Pike, HFM-99 Rockville, MD 20832-1448

CDER:

U.S. Food and Drug Administration Center for Drug Evaluation and Research Central Document Room 5901-B Ammendale Rd. Beltsville, MD 20705-1266

U. S. Food and Drug Administration Office of Generic Drugs – HFD-600 Center for Drug Evaluation and Research Metro Park North II 7500 Standish Place, Rm. 150 Rockville, MD 20855-2773

B. Types of physical media accepted

See the following table:

Type of media	Format	Size
CD ROM	CD-R Joliet Specification	Up to 3 GB (1- 5 CDs)
DVD	DVD-R	Up to 45 GB (1 to 6 DVDs)
	DVD+R	
	DVD+/-R	
Digital Linear Tape	35/70 or 40/80 DLT tapes using	No limit
DLT-IV*	BackupExec, or	(contact Agency Center for any
	Windows 2000/2003 native backup	submission over 45 GB)
Linear Tape Open	LTO 1, 2, 3, or 4 tapes using	No limit
LTO*	BackupExec, or	(contact Agency for any submission
	Windows 2000/2003 native backup	over 45 GB)
USB drive	Device Type: External hard drive	Over 45 GB only
	Size not to exceed:	(contact the Agency Center in
	Width: 4 in	advance for specific instructions on
	Depth: 5 in	how to send – see below for email
	Height: 1 in	addresses)
	• Interface: Hi-Speed USB 2.0	
	with a Type A connector	<u>IMPORTANT</u> :
	Passcode: use 6 to 24 digits	DO NOT SUBMIT USB DRIVES
	(optional)	FOR SUBMISSIONS UNDER 45
	Compliant Standards: 128-bit	GB
	AES (Advanced Encryption	
	Standard)	
	Driverless operation	
	Built-in USB cable with included	
	power source: USB Bus	

^{*}THESE TAPE FORMATS WILL BE RETIRED ON 12/31/2012

IMPORTANT: Do not compress data. Do not password protect any data. The only exception is the optional passcode encryption of a USB drive.

C. Media preparation

Send all electronic media adequately secured in a standard binder marked clearly on the outside ELECTRONIC REGULATORY SUBMISSION FOR ARCHIVE. Do not send unlabeled media.

The following information should be included on the media labels:

Sponsor, applicant or company name Name of the product, chemical or ingredient Appropriate regulatory ID number (e.g., NDA application number) Submission date (dd-mmm-yyyy) Media series (e.g., "1 of 1", "1 of 2")

> Questions may be sent to: CDER: <u>ESUB@fda.hhs.gov</u> CBER: <u>ESUBPREP@fda.hhs.gov</u>

INTERNATIONAL CONFERENCE ON HARMONISATION OF TECHNICAL REQUIREMENTS FOR REGISTRATION OF PHARMACEUTICALS FOR HUMAN USE

ICH M2 EWG

Electronic Common Technical Document Specification

This specification has been developed by the ICH M2 Expert Working Group and maintained by the eCTD Implementation Working Group in accordance with the ICH Process as pertains to the M2 EWG and eCTD change control as it pertains to the eCTD IWG.

Document Change History

Version Number	Date	Description
Version 3.0	October 2003	Initial Step 4 Document
Version 3.1	November 2003	Incorporated approved change requests 00020, 00030, 00090, 00110, 00190, 00200, 00240, 00260, 00290, 00310, 00380, 00400, 00420, 00450, 00480, 00500, 00510, 00520, 00530
Version 3.2	February 2004	Editorial Corrections and Changes to Align with the M4 Organisation Document : Granularity Annex
Version 3.2.1	June 2008	Incorporated approved change requests 0120, 0130, 0140, 0210, 0270, 0300, 0390, 0560, 0590, 0600, 0620, 0640, 0670, 0770, 0780, 0810, 0820, 0940, 0960, 1030, 1080, 01170, 1250, 1280, 1310, 1320, 1360, 1370, 1400, 1450, 1580, 1660, 1680. Incorporated eCTD Q&As 1-3, 5-7, 9-11, 13, 15, 17-19, 21, 23, 24, 28-34, 37-39 and 41-47. Provided clarity on Operation Attribute use. Converted all instances of 'leafs' to 'leaf elements'. Removed numbering not defined by CTD (e.g., 4.2.1.1.1). Introduced allowance for 'append' leaf to modify leaf in same sequence. Corrected typos and other wording issues.
Version 3.2.2	July 2008	Minor editorial corrections after Step 4 approval and sign-off

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ICH eCTD Specification

Introduction

The ICH M4 Expert Working Group (EWG) has defined the Common Technical Document (CTD). The ICH M2 EWG has defined, in the current document, the specification for the Electronic Common Technical Document (eCTD). The eCTD is defined as an interface for industry to agency transfer of regulatory information while at the same time taking into consideration the facilitation of the creation, review, life cycle management and archiving of the electronic submission. The eCTD specification lists the criteria that will make an electronic submission technically valid. The focus of the specification is to provide the ability to transfer the registration application electronically from industry to a regulatory authority. Industry to industry and agency to agency transfer is not addressed.

Background

The specification for the eCTD is based upon content defined within the CTD issued by the ICH M4 EWG. The CTD describes the organization of modules, sections and documents. The structure and level of detail specified in the CTD have been used as the basis for defining the eCTD structure and content but, where appropriate, additional details have been developed within the eCTD specification.

The philosophy of the eCTD is to use open standards. Open standards, including proprietary standards which through their widespread use can be considered *de facto* standards, are deemed to be appropriate in general.

Scope

The CTD as defined by the M4 EWG does not cover the full submission that is to be made in a region. It describes only modules 2 to 5, which are common across all regions. The CTD does not describe the content of module 1, the Regional Administrative Information and Prescribing Information, nor does it describe documents that can be submitted as amendments or variations to the initial application.

The value of producing a specification for the creation of an electronic submission based only upon the modules described in the CTD would be limited. Therefore, the M2 EWG has produced a specification for the eCTD that is applicable to all modules of initial registration applications and for other submissions of information throughout the life cycle of the product, such as variations and amendments.

This document describes the parts of the registration application that are common to all regions and some of the life cycle requirements for products. The parts of the registration application that are specific to a region will be covered by regional guidance. However, this backbone has been developed to handle both the regional and common parts of submissions.

Technical Requirements

The specification is designed to support high-level functional requirements such as the following:

- Copy and paste
- Viewing and printing of documents
- Annotation of documentation
- Facilitate the exporting of information to databases
- Searching within and across applications
- Navigation throughout the eCTD and its subsequent amendments/variations

Change Control

The specification for the eCTD is likely to change with time. Factors that could affect the content of the specification include, but are not limited to:

- Change in the content of the CTD, either through the amendment of information, at the same level of detail, or by provision of more detailed definition of content and structure
- Change to the regional requirements for applications that are outside the scope of the CTD
- Updating standards that are already in use within the eCTD
- Identification of new standards that provide additional value for the creation and/or usage of the eCTD
- Identification of new functional requirements
- Experience of use of the eCTD by all parties

Details of the change control management are described in an external ICH document.

Appendix 1: Overall Architecture

Guiding Design Principles

This appendix defines the basic principles that drove the design and architecture of the eCTD. Detailed specifications are defined in appendices 2 and 6.

Business Model

The business process to be supported can be described as follow:

The business process defines specific requirements for the message. The eCTD Specification currently provides only a transport mechanism for one-way traffic from applicant to agency.

The primary focus of the eCTD is to provide a data interchange message between industry and agencies. Industry initiates the process by creating the initial submission in terms of an electronic CTD. Throughout the life cycle of this process, additional information will be submitted to update or modify the information contained in the initial submission (e.g., supplement, amendment, variation.) The agency can submit acknowledgements, queries and requests to industry. These are considered simple messages using electronic mail or other transport formats. The overall architecture of the eCTD is designed to provide a commonly agreed upon submission and submission structure that imposes minimal restriction to the industry and agencies.

Modular Structure of the eCTD

The structure of the electronic submission in terms of organization and navigation should be consistent with the modular structure of the Common Technical Document. The goal of this design principle is to standardize the electronic format of the common parts of the eCTD.

XML Based eCTD

The XML eCTD DTD (Document Type Definition) defines the overall structure of the submission. The purpose of the XML backbone is two-fold: (1) to manage meta-data for the entire submission and each document within the submission and (2) to constitute a comprehensive table of contents and provide corresponding navigation aids. Meta-data on submission level include information about submitting and receiving organization, manufacturer, publisher, ID and kind of the submission, and related data items. Examples for meta-data on document level are versioning information, language, descriptive information such as document names and checksums. Details are defined in appendix 6.

The XML instance of any submission should be created and validated according to the XML eCTD DTD as defined in appendix 8.

The XML eCTD DTD describes the hierarchical structure according to the CTD as defined by the ICH M4 Expert Working Group. It includes multiple hierarchical levels depending on the specific module as defined in the CTD. The actual submission can include more hierarchical levels below those defined in the CTD. The XML eCTD instance covers the entire submission including all hierarchical levels and includes references to each individual file.

The submission should include a Stylesheet that supports presentation of the XML instance, navigation according to the table of contents, and provides access to all documents within the submission. A standard Stylesheet for viewing the eCTD submission is defined and provided by the ICH M2 EWG. Presentation and navigation via other Stylesheets on the receiving side should be possible. Consult regional authorities on the acceptability of submitting non-ICH stylesheets.

Multiple Region Support

The scope of each submission is global according to the Common Technical Document, meaning that modules 2 through 5 of a submission are intended for all regions with the exception of selected documents (e.g., in the quality module), which have a regional scope. Module 1 of a submission is regional in nature.

The DTD as defined by the ICH M2 expert working group specifies the structure of the common parts of the eCTD primarily focusing on module 2 through 5. It enables linking to regional XML index files for module 1 which will be defined by the authorities in each region. Due to the significant differences in documentation requirements across regions it is not expected that a single, global eCTD submission could be constructed and transmitted to multiple regions with each regional authority ignoring or deleting other regions' submission material.

Life Cycle Management

The applicant creates a submission that is stored in a local repository. The applicant submits the initial submission to the agency, which imports the submission into another local repository. The nature and kind of the local repositories is not within the scope of the eCTD. The initial submission should be self-contained, meaning that it includes all documents and no references to other submissions. Regional guidance should be consulted if references to other submissions are needed.

Following the initial submission, the applicant can submit incremental updates such as amendments and variations. Updates can refer to documents in the previous submissions. Updates should be designed in a way that they can be loaded into the repository by fully preserving the initial or previous submission via version control. The XML backbone should include meta-data identifying the update and providing navigation aids to filter for different submission types.

It is preferred that when a Common Technical Document is submitted electronically, the entire submission be in electronic form with the exception of certain regional forms that currently require written signatures. See appendix 5 for regional requirements. See appendix 6 for a description of how to submit a CTD containing both paper and electronic components.

Appendix 2: The eCTD Submission

Introduction

This appendix specifies the Information Technology aspect of the eCTD submission. Informally, the eCTD submission is a directory structure with files including the XML eCTD instance, reports, data and other submission information. The eCTD submission supports multilingual and multi-region aspects.

The eCTD Submission

An eCTD submission is a collection of data objects that follows the eCTD specification. The main
function of the eCTD submission is data exchange. Information systems would need to be developed to
process the eCTD submission. The biggest benefits are expected when the eCTD submission is loaded
into an information system that supports the review process. However, one can view an eCTD
submission with a Web browser as it is Web ready.

The eCTD submission is composed of the following:

- Directory structure
- XML eCTD instance
- Content files

Directory Structure

The directory structure is a structure of directories and files. There should be a reasonable maximum number of entries (directories and files) per directory. The directory structure should follow the rules below. The files could be in several formats as specified below.

The name of the files and directories are identifiers. They should be short. The file names are not intended to convey meta-data, though some meaning in the names helps (i.e., no random names.)

Recommended, but optional, names for directories and files are provided in Appendix 4. Any directory names and file names that are added to the eCTD submission by the applicant should be descriptive, logical and brief.

XML eCTD Instance

The instance is in the submission sequence number directory (see appendix 6). The submission sequence number directory should contain at least two files and one or more directories. One of the files in the submission sequence directory should be the instance and the other should be the MD5 checksum of the instance. The instance is the starting file for the processing by an XML processor.

The intention is to have links from the leaf elements of the instance to the files in the eCTD submission as opposed to creating a single XML document that contains the entire eCTD submission. The instance also contains meta-data at the leaf level.

eCTD Template

The ICH Web site (http://estri.ich.org/eCTD) includes an empty eCTD folder template as an example of an eCTD submission folder structure. It shows all of the possible Module 2-5 folders as defined in Appendix 4 and can be populated with the applicant data and edited as appropriate (i.e., adding additional subfolders or removing unnecessary folders). The applicant should still add the relevant regional Module 1 folders and content, add the appropriate utility folders and content, and create the XML index files to complete a valid eCTD submission.

Formats

Formats should be readable at least for as long as it is needed for the regulatory process. This process could be very long (e.g., 50 years). This points to the advantage of neutral formats: formal standard, industrial

standard, vendor independent, and text-like. The format should be adapted to the type of data. Appendix 7 describes the way in which these files should be constructed.

The list of agreed to formats will be updated as technology evolves and new requirements arise. XML will be the preferred format for all types of data.

Common Formats

The common formats that can be included in an eCTD submission are:

- Narrative: Portable Document Format (PDF)
- Structured: Extensible Markup Language (XML)
- Graphic: Whenever possible, use PDF. When appropriate or when PDF is not possible, use Joint
 Photographic Experts Group (JPEG), Portable Network Graphics (PNG), Scalable Vector Graphics
 (SVG), and Graphics Interchange Format (GIF). Special formats for very high resolutions could be
 appropriate on a case-by-case basis.

Regional Use of Other Formats

Regulatory authorities and applicants could agree to use other formats regionally (i.e., non-common formats or uses of the common formats in a different way from above). The use of other formats is discouraged and the intention is to use as much as possible the common formats. The intention of the use of other formats is for transition.

There are two classes of transitions:

- Legacy Transition: from the past to the present (i.e., old formats to present formats.)
- Future Transition: from the present to the future (i.e., from present formats to new formats.) The new formats would normally be candidates for common formats.

Links

CTD cross-references can be supported in the eCTD through the use of hyperlinks. Links among objects in the eCTD submission should be relative. The intention is to make the eCTD submission self-contained. All literature references introduced by the applicant should be included in the submission.

One can always point to a file. The capacity to point to a specific location within a file depends on the linking technology. Different formats allow for the use of different linking technology. See Appendix 7.

Presentation

Presentation is closely associated with formats. To associate a Stylesheet with a file usually one has to use a linking technology. The linking between Stylesheet (which could be in a separate file) and a data file should be relative. In addition, there is the dimension of media. One file could have several Stylesheets; the one used depends on the media. For example, there could be one presentation for the screen and another for paper.

Checksums

The eCTD submission should contain checksums for each individual file including a checksum file for the eCTD XML instance. Initially, the MD5 Message-Digest Algorithm (MD5) should be used for this purpose. Including a checksum for each individual file provides a number of benefits including:

- The integrity of each file can be verified by comparing the checksum submitted with the file and the computed checksum.
- The checksum can be used to verify that the file has not been altered in the historical archive of the regulatory authority. This is especially useful as the files are migrated from one storage medium to another, as in the case of backup to magnetic tape storage.

Element to File Directory Mapping

The following rules are recommended:

- The rules below for the file and directories take precedence.
- Add the corresponding extension to the file.
- If appropriate, use a reasonable abbreviation.

File Extension

All files should have one and only one file extension. The file extension should be used to indicate the format of the file. For example:

hello.pdf	PDF
hello.rtf	RTF

The mapping between formats and extensions are:

IANA nomenclature

text/css CSS text/html html or htm text/xml xml application/pdf pdf application/rtf rtf application/vnd.ms-excel xls image/jpeg jpg image/png png image/gif gif

Non IANA nomenclature

DTD dtd XPT (SAS) xpt XSL xsl

The eCTD submission could use formats not registered with the Internet Assigned Numbers Authority (IANA).

The presence of a format in this list does not imply that it would be considered an acceptable format. For formats absent from this list, widely used mapping between the formats and the extensions should be used.

Future direction: if a mechanism (e.g., standard) becomes available that associates the formats with file extension, it should be considered for this specification.

Name

Name is a token composed of the following characters:

- Letters "a" to "z" [U+0061 to U+007A].
- Digits "0" to "9" [U+0030 to U+0039].
- "-" [HYPHEN-MINUS, U+002D].

The notation "U+" refers to the Unicode [UNICODE] notation.

This Specification does not provide for Japanese characters in file and folder names.

Examples of correct names (only the name without the extension): part-b

myfile hello

Examples of incorrect names (only the name without the extension):

```
part a (' '; SPACE is not allowed)
```

```
myfile.xml ('.'; FULL STOP is not allowed)
hello:pdf (':'; COLON is not allowed)
part_a ('_', LOW LINE is not allowed)
Parta (UPPERCASE is not allowed)
```

Directory name is a name.

File name is one name followed by one name separated by a '.' (FULL STOP, U+002E).

Correct file names (with the extension):

myfile.pdf hello.cml

Incorrect file names (with the extension):: a part.pdf (''; SPACE is not allowed) hello (missing extension)

hello:xml (':'; COLON is not allowed)

The maximum length of the name of a single folder or file is 64 characters including the extension. Only lower case letters should be used in all file and directory names. The maximum length of a path is 230 characters, including file name, and extension. This allows regulators 26 characters to add to the path in their review environments. Consult regional guidance for further restrictions on the maximum path length. If the path exceeds the 230 character limit or the regionally-defined limit, then folder and file names created by the applicant should be abbreviated. If further reduction is still called for, the file and folder names recommended in Appendix 4 should be abbreviated. Applicants should also consult regional media formats and M2 EWG recommendations for possible folder limits imposed by the media.

Document name is the first name in the file name. For example, "docname" in the file name "docname.ext".

Character encoding

The character encoding (charset) in order of preference is:

- Unicode UTF-8, Unicode 16 bits [ISO-10646].
- ISO-8859-1 (Latin-1) or appropriate ISO-8859-x; e.g., ISO-8859-7 for Greek.
- The appropriate SHIFT JIS.
- Other character encoding agreed upon regionally by the regulatory authority and applicant.

References

[CML] *Chemical Markup Language* http://cml.sourceforge.net

[CSS2] Cascading Style Sheets, level 2 http://www.w3.org/TR/REC-CSS2

[ECMAScript] *ECMAScript Language Specification*, 3rd edition. ECMA- 262 http://www.ecma-international.org/publications/standards/Ecma-262.htm

[EXCEL] Microsoft Excel

http://www.microsoft.com/office/excel/default.htm

[GIF] Graphics Interchange Format http://tronche.com/computer-graphics/gif/gif89a.html

[HTML] *HTML 4.01 Specification* http://www.w3.org/TR/html4

[IANA] Internet Assigned Numbers Authority http://www.iana.org

[IMT] Internet Media Types http://www.iana.org/assignments/media-types/

[ISO-10646] Information Technology -- Universal Multiple-Octet Coded Character Set (UCS) -- Part 1: Architecture and Basic Multilingual Plane, ISO/IEC 10646-1:1993

[ISO-639] *Codes for the representation of names of languages* ISO 639:1988.

http://www.oasis-open.org/cover/iso639a.html

[JPEG] Joint Photographic Experts Group http://www.jpeg.org/public/wg1n1807.txt

[MD5] *The MD5 Message-Digest Algorithm* http://ietf.org/rfc/rfc1321.txt

[PDF] *Portable Document Format* http://www.adobe.com/devnet/pdf/pdf_reference.html

[PNG] PNG (Portable Network Graphics) Specification Version 1.0 http://www.w3.org/TR/REC-png.html

[RTF] *Rich Text Format (RTF) Specification, version 1.6* http://msdn.microsoft.com/library/specs/rtfspec.htm

[SVG] *Scalable Vector Graphics (SVG) 1.0 Specification* (work in progress) http://www.w3.org/TR/1999/WD-SVG-19991203

[UNICODE] Unicode Consortium http://www.unicode.org

[XHTML] XHTML 1.0: The Extensible HyperText Markup Language http://www.w3.org/TR/WD-html-in-xml

[XML] Extensible Markup Language (XML) 1.0 (Second Edition) http://www.w3.org/TR/REC-xml.html

[XSL] Extensible Stylesheet Language (XSL) Version 1.0 W3C Recommendation 15 October 2001 http://www.w3.org/TR/WD-xsl

[XSLT] *XSL Transformations* http://www.w3.org/TR/xslt.html

Appendix 3: General Considerations for the CTD Modules

Introduction

Documents that are provided in the different modules should be formatted as defined by the ICH Common Technical Document. There should also be consistency in the way navigational aids are provided. Within each document, bookmarks and hypertext links from the table of contents should be provided to all tables, figures, publications, and appendices.

Hypertext links should be provided throughout the body of these documents to aid efficient navigation to annotations, related sections, publications, appendices, tables, and figures that are not located on the same page. CTD cross-references can be supported in the eCTD through the use of hyperlinks. If a list of references is included at the end of a document, there should be hypertext links to the appropriate publication.

Documents should be generated from electronic source documents and not from scanned material, except where access to the source electronic file is unavailable or where a signature is called for.

Folder and File Naming Conventions

Recommended, but optional, folder and file names are presented in this specification. These could be used in most cases, however applicants can modify this specification where appropriate. For example, it is generally acceptable to include an additional folder for information where an appropriate folder name is unavailable in the eCTD specification or to provide for additional file organization where the recommended foldering is inadequate. It is recommended that applicants maintain folder names listed in this specification. This should not be interpreted to mean that the actual eCTD XML DTD should be changed or altered in any way.

The maximum length of the name of a single folder or file is 64 characters including the extension. Folder or file names should be written in lower case only. All files should have one and only one file extension. The file extension should be used to indicate the format of the file. More details on the naming conventions are given in Appendix 2, and examples in Appendix 4.

Filenames provided in the eCTD are optional. To assist the reviewer when several similar files are open at the same time, it can be appropriate to consider alternative naming conventions that could provide unique, understandable filenames. The general provisions for naming of files are in Appendix 2 of the Specification.

Typically, the file name would be the applicant's internal numbering or naming convention for the studies. The following table gives an example of how files could be named.

_

¹ Regulatory authorities should be notified of additions and changes to the folder structure according to regional guidance.

Table 3-1

Description	File Name
Study Report 1	study-report-1.pdf
Study Report 2	study-report-2.pdf
Study Report n	study-report-n.pdf

Screenshots and Folder Hierarchy

Screenshots are provided in the following chapters for all modules down to the level of hierarchy as described in this appendix. The representation in module 3 is in alphabetical order due to the nature of the computer operating system and is therefore not entirely consistent with the sequence of the CTD. In a Web browser the content will appear in the order of the CTD table of contents.

Detailed options on the folders and files are provided in Appendix 4 in case the applicant chooses to submit more granular documents. It is not mandatory to use the full folder hierarchy. Empty directories can be omitted; however, when the content is expected, justification should be provided as to why it is missing in accordance with regional guidance.

Module 1 Administrative Information and Prescribing Information

The name of the folder for module 1 should be m1.

This module contains administrative information that is unique for each region. Regional guidance will provide the specific instructions on how to provide the administrative forms and detailed prescribing information. Please refer to Appendix 5 when preparing module 1.

Module 2 Summaries

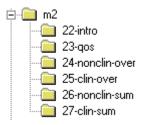
The files in this module should be provided as PDF text with the exception of a few embedded images, when needed. The name of the folder for module 2 should be m2. The folders in module 2 should be named as follows but can be further reduced or omitted to minimize path length issues.

Table 3-2

Tuble 5 M			
Section in CTD	Description	Folder Name	
2.2	Introduction	22-intro	
2.3	Quality overall summary	23-qos	
2.4	Nonclinical Overview	24-nonclin-over	
2.5	Clinical Overview	25-clin-over	
2.6	Nonclinical Written and Tabulated Summaries	26-nonclin-sum	
2.7	Clinical summary	27-clin-sum	

A representative folder hierarchy for module 2 is presented in the screenshot in figure 3-1.

Figure 3-1 Screenshot representation of the folder structure of module 2



Module 3 Quality

The name of the folder for module 3 should be m3. The folders in module 3 should be named as follows but can be further reduced or omitted to minimize path length issues.

Table 3-3

Table 3-3			
Section in CTD	Description	Folder Name	
3.2	Body of Data	32-body-data	
3.2.S	Drug Substance	32s-drug-sub	
3.2.S	Drug Substance [Drug Substance Name] [Manufacturer] ²	substance-1-manufacturer-1	
3.2.S.1	General Information (name, manufacturer)	32s1-gen-info	
3.2.S.2	Manufacture (name, manufacturer)	32s2-manuf	
3.2.S.3	Characterisation (name, manufacturer)	32s3-charac	
3.2.S.4	Control of Drug Substance (name, manufacturer)	32s4-contr-drug-sub	
3.2.S.4.1	Specification (name, manufacturer)	32s41-spec	
3.2.S.4.2	Analytical Procedures (name, manufacturer)	32s42- analyt-proc	
3.2.S.4.3	Validation of Analytical Procedures (name, manufacturer)	32s43-val-analyt-proc	
3.2.S.4.4	Batch Analyses (name, manufacturer)	32s44-batch-analys	
3.2.S.4.5	Justification of Specification (name, manufacturer)	32s45-justif-spec	
3.2.S.5	Reference Standards or Materials (name, manufacturer)	32s5-ref-stand	
3.2.S.6	Container Closure System (name, manufacturer)	32s6-cont-closure-sys	
3.2.S.7	Stability (name, manufacturer)	32s7-stab	
3.2.P	Drug Product (name, dosage form) ³	32p-drug-prod	
3.2.P	Drug Product (name, dosage form) - Name	product-1	
3.2.P.1	Description and Composition of the Drug Product (name, dosage form)	32p1-desc-comp	
3.2.P.2	Pharmaceutical Development (name, dosage form)	32p2-pharm-dev	

²Each drug substance-manufacturer should be placed in a separate subordinate folder. Folders and files should be created for each drug substance-manufacturer section included in the submission in accordance with the hierarchy identified in the following chapters.

³ Each drug product should be placed in a separate subordinate folder. Folders and files should be created for each drug product section included in the submission in accordance with the hierarchy identified in the following chapters. Reference should be made to regional guidance to determine whether the inclusion of multiple products within a single application is considered appropriate.

Section in CTD	Description	Folder Name
3.2.P.3	Manufacture (name, dosage form)	32p3-manuf
3.2.P.4	Control of Excipients (name, dosage form)	32p4-contr-excip
3.2.P.4	Control of Excipients (name, dosage form) - Excipient 1	excipient-1
3.2.P.5	Control of Drug Product (name, dosage form)	32p5-contr-drug-prod
3.2.P.5.1	Specification(s) (name, dosage form)	32p51-spec
3.2.P.5.2	Analytical Procedures (name, dosage form)	32p52-analyt-proc
3.2.P.5.3	Validation of Analytical Procedures (name, dosage form)	32p53-val-analyt-proc
3.2.P.5.4	Batch Analyses (name, dosage form)	32p54-batch-analys
3.2.P.5.5	Characterisation of Impurities (name, dosage form)	32p55-charac-imp
3.2.P.5.6	Justification of Specifications (name, dosage form)	32p56-justif-spec
3.2.P.6	Reference Standards or Materials (name, dosage form)	32p6-ref-stand
3.2.P.7	Container Closure System (name, dosage form)	32p7-cont-closure-sys
3.2.P.8	Stability (name, dosage form)	32p8-stab
3.2.A	Appendices	32a-app
3.2.A.1	Facilities and Equipment (name, manufacturer)	32a1-fac-equip
3.2.A.2	Adventitious Agents Safety Evaluation (name, dosage form, manufacturer)	32a2-advent-agent
3.2.A.3	Excipients- Name 4	32a3-excip-name-1
3.2.R	Regional Information ⁵	32r-reg-info
3.3	Literature References	33-lit-ref

⁴ The folder name should include the name of the excipient, abbreviated as necessary to remain within the 64 character limit.
⁵ This folder should be included where regional information is appropriate. Reference should be made to regional guidance for the types of information to be included in this section.

A representative folder hierarchy for module 3 is presented in the screenshot in figure 3-2.

<u>-</u>--- m3 🖃 🧰 32-body-data <u>-</u> 32a-app ·🔲 32a1-fac-equip 32a2-advent-agent 32a3-excip-name-1 🚊 🧰 32p-drug-prod ⊨ i product-1 -- 🛅 32p1-desc-comp 32p2-pharm-dev 32p3-manuf 🚊 🧰 32p4-contr-excip excipient-1 i 32p5-contr-drug-prod 32p51-spec 32p52-analyt-proc 32p53-val-analyt-proc 32p54-batch-analys 32p55-charac-imp 32p56-justif-speci 32p6-ref-stand 32p7-cont-closure-sys 32p8-stab 32r-reg-info 🚊 📵 32s-drug-sub 🖮 🧰 substance-1-manufacturer-1 --- 32s1-gen-info · 🛅 32s2-manuf - 32s3-charac 🚊 📵 32s4-contr-drug-sub · 🛅 32s41-spec 32s42-analyt-proc 32s43-val-analyt-proc 32s44-batch-analys 32s45-justif-speci 32s5-ref-stand 32s6-cont-closure-sys 32s7-stab 33-lit-ref

Figure 3-2 Screenshot representation of the folder structure of module 3

Module 4 Nonclinical Study Reports

The name of the folder for module 4 should be m4. The folders in module 4 should be named as follows but can be further reduced or omitted to minimize path length issues.

Table 3-4

Section in CTD	Description	Folder Name
4.2	Study Reports	42-stud-rep
4.2.1	Pharmacology	421-pharmacol
4.2.1.1	Primary Pharmacodynamics	4211-prim-pd
4.2.1.2	Secondary Pharmacodynamics	4212-sec-pd
4.2.1.3	Safety Pharmacology	4213-safety-pharmacol
4.2.1.4	Pharmacodynamic Drug Interactions	4214-pd-drug-interact
4.2.2	Pharmacokinetics	422-pk
4.2.2.1	Analytical Methods and Validation Reports (if separate reports are available)	4221-analyt-met-val
4.2.2.2	Absorption	4222-absorp
4.2.2.3	Distribution	4223-distrib
4.2.2.4	Metabolism	4224-metab
4.2.2.5	Excretion	4225-excr
4.2.2.6	Pharmacokinetic Drug Interactions (nonclinical)	4226-pk-drug-interact
4.2.2.7	Other Pharmacokinetic Studies	4227-other-pk-stud
4.2.3	Toxicology	423-tox
4.2.3.1	Single-Dose Toxicity (in order by species, by route)	4231-single-dose-tox
4.2.3.2	Repeat-Dose Toxicity (in order by species, by route, by duration, including supportive toxicokinetics evaluations)	4232-repeat-dose-tox
4.2.3.3	Genotoxicity	4233-genotox
4.2.3.3.1	In vitro	42331-in-vitro
4.2.3.3.2	In vivo (including supportive toxicokinetics evaluations)	42332-in-vivo
4.2.3.4	Carcinogenicity (including supportive toxicokinetics evaluations)	4234-carcigen
4.2.3.4.1	Long-term studies (in order by species, including range-finding studies that cannot be appropriately included under repeat-dose toxicity or pharmacokinetics)	42341-lt-stud

Section in CTD	Description	Folder Name
4.2.3.4.2	Short-or medium-term studies (including range- finding studies that cannot be appropriately included under repeat-dose toxicity or pharmacokinetics)	42342-smt-stud
4.2.3.4.3	Other studies	42343-other-stud
4.2.3.5	Reproductive and Developmental Toxicity (including range-finding studies and supportive toxicokinetics evaluations)	4235-repro-dev-tox
4.2.3.5.1	Fertility and early embryonic development	42351-fert-embryo-dev
4.2.3.5.2	Embryo-fetal development	42352-embryo-fetal-dev
4.2.3.5.3	Prenatal and postnatal development, including maternal function	42353-pre-postnatal-dev
4.2.3.5.4	Studies in which the offspring (juvenile animals) are dosed and/or further evaluated	42354-juv
4.2.3.6	Local Tolerance	4236-loc-tol
4.2.3.7	Other Toxicity Studies (if available)	4237-other-tox-stud
4.2.3.7.1	Antigenicity	42371-antigen
4.2.3.7.2	Immunotoxicity	42372-immunotox
4.2.3.7.3	Mechanistic studies (if not included elsewhere)	42373-mechan-stud
4.2.3.7.4	Dependence	42374-dep
4.2.3.7.5	Metabolites	42375-metab
4.2.3.7.6	Impurities	42376-imp
4.2.3.7.7	Other	42377-other
4.3	Literature References	43-lit-ref

A representative folder hierarchy for module 4 is presented in the screenshot in figure 3-3.

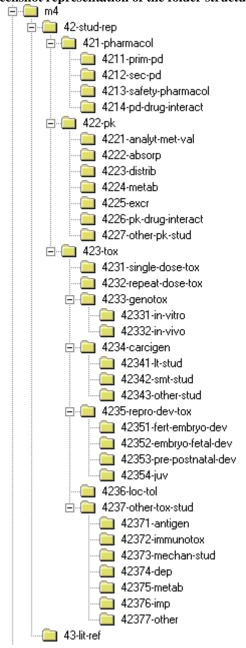


Figure 3-3 Screenshot representation of the folder structure of module 4

Module 5 Clinical Study Reports

The name of the folder for module 5 should be m5. The folders in module 5 should be named as follows but can be further reduced or omitted to minimize path length issues.

Table 3-5

Section in CTD	Description	Folder Name
5.2	Tabular Listing of all Clinical Studies	52-tab-list
5.3	Clinical Study Reports	53-clin-stud-rep
5.3.1	Reports of Biopharmaceutic Studies	531-rep-biopharm-stud
5.3.1.1	Bioavailability (BA) Study Reports	5311-ba-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.1.2	Comparative BA and Bioequivalence (BE) Study Reports	5312-compar-ba-be-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.1.3	In vitro – In vivo Correlation Study Reports	5313-in-vitro-in-vivo-corr-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.1.4	Reports of Bioanalytical and Analytical Methods for Human Studies	5314-bioanalyt-analyt-met
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.2	Reports of Studies Pertinent to Pharmacokinetics using Human Biomaterials	532-rep-stud-pk-human-biomat
5.3.2.1	Plasma Protein Binding Study Reports	5321-plasma-prot-bind-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3

Section in CTD	Description	Folder Name
5.3.2.2	Reports of Hepatic Metabolism and Drug Interaction Studies	5322-rep-hep-metab-interact-stud
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.2.3	Reports of Studies Using Other Human Biomaterials	5323-stud-other-human-biomat
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.3	Reports of Human Pharmacokinetic (PK) Studies	533-rep-human-pk-stud
5.3.3.1	Healthy Subject PK and Initial Tolerability Study Reports	5331-healthy-subj-pk-init-tol-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.3.2	Patient PK and Initial Tolerability Study Reports	5332-patient-pk-init-tol-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.3.3	Intrinsic Factor PK Study Reports	5333-intrin-factor-pk-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.3.4	Extrinsic Factor PK Study Reports	5334-extrin-factor-pk-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.3.5	Population PK Study Reports	5335-popul-pk-stud-rep
	"Study Report 1"	study-report-1

Section in CTD	Description	Folder Name
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.4	Reports of Human Pharmacodynamic (PD) Studies	534-rep-human-pd-stud
5.3.4.1	Healthy Subject PD and PK/PD Study Reports	5341-healthy-subj-pd-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.4.2	Patient PD and PK/PD Study Reports	5342-patient-pd-stud-rep
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.5	Reports of Efficacy and Safety Studies	535-rep-effic-safety-stud
5.3.5	Reports of Efficacy and Safety Studies – Indication Name	indication-1
5.3.5.1	Study Reports of Controlled Clinical Studies Pertinent to the Claimed Indication	5351-stud-rep-contr
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.5.2	Study Reports of Uncontrolled Clinical Studies	5352-stud-rep-uncontr
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.5.3	Reports of Analyses of Data from More than One Study	5353-rep-analys-data-more-one-stud
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.5.4	Other Study Reports	5354-other-stud-rep
	"Study Report 1"	study-report-1

Section in CTD	Description	Folder Name
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.3.6	Reports of Postmarketing Experience	536-postmark-exp
5.3.7	Case Report Forms and Individual Patient Listings $^{\delta}$	537-crf-ipl
	"Study Report 1"	study-report-1
	"Study Report 2"	study-report-2
	"Study Report 3"	study-report-3
5.4	Literature References	54-lit-ref

The CTD organization provides locations for case report forms and individual patient data listings in Module 5.3.7 and for literature references in Module 5.4.

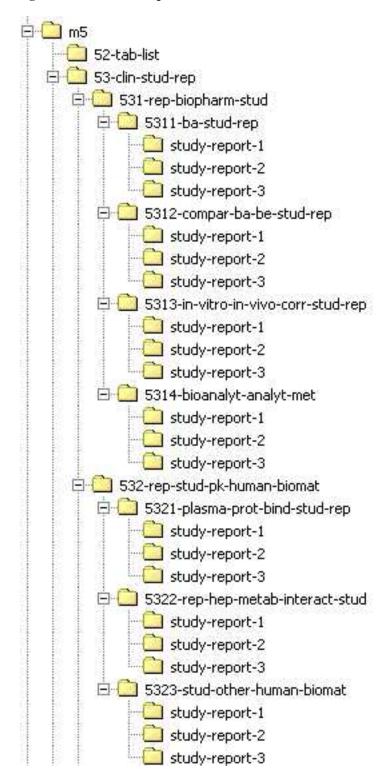
In the eCTD, files for publications and literature references should be located in the folder for Module 5.4. However, in the index.xml file the leaf elements for these publications and literature references should be included under the same heading as the other study report files with additional information included through use of the study tagging file, if applicable in that region. In addition, a repeat of the leaf element should be placed under the heading for 5.4 Literature References.

Case report forms, data sets and individual patient data listings should be organized according to regional guidance.

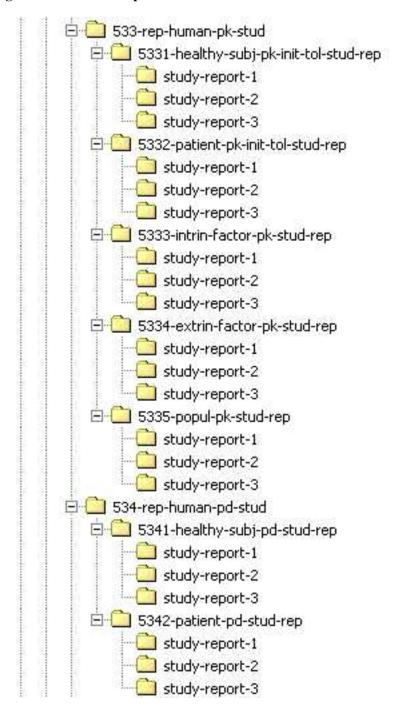
⁶ The content of this folder should follow regional guidance.

A representative folder hierarchy for module 5 is presented in the screenshot in figure 3-4.

Figure 3-4 Screenshot representation of the folder structure of module 5











Appendix 4: File Organization for the eCTD

Each item in the file organization table that is listed in this appendix includes the information outlined below:

Sequential		Each item in the table has a unique sequentially assigned reference number. These reference numbers can
number		change with each version of this appendix.
	Number	CTD section number
	Title	CTD title
	Element	Element name in the Backbone
	File/Directory	Relative path of the File/Directory. The file extension corresponds to the file type; i.e., the "pdf" extension is
		only illustrative. Refer to Table 6.1, Appendix 6, for details for the head of the path name
	Comment	Comments

The file organization table covers files that constitute the backbone itself plus any additional files to make the submission complete, readable and processable. The file and folder names shown within modules 2-5 are not mandatory, but recommended, and can be further reduced or omitted to avoid path length issues. Refer to the M4 Organisation Document: Granularity Annex in the ICH guidance on 'Organisation of the Common Technical Document for the Registration of Pharmaceuticals for Human Use' for information on where multiple documents/files are appropriate in each section of the eCTD. This describes what is considered to be the appropriate granularity for each section of the CTD and hence the eCTD. Where there is no definition provided in the organisation document, applicants are free to construct the dossier as they see fit with respect to document granularity.

Where file and folder names are presented in italics applicants would substitute these with appropriate file names in accordance with their own naming conventions.

Table 4-1

	Number	
	Title	
1	Element	
	File	index.xml
	Comment	This is the Backbone
	Number	
	Title	
2	Element	
	File	index-md5.txt
	Comment	The MD5 of the Backbone

	Number	1
3	Title	Administrative Information and Prescribing Information
	Element	m1-administrative-information-and-prescribing-information
	Directory	m1
	Comment	Only one of the regional directories is needed
	Number	
	Title	
4	Element	
	Directory	m1/eu
	Comment	EU directory: In addition to the appropriate regional documents, the regional xml instance should be located in this folder. Refer to regional guidance for details
	Number	
	Title	
5	Element	
3	Directory	m1/jp
	Comment	Japan directory: In addition to the appropriate regional documents, the regional xml instance should be located in this folder. Refer to regional guidance for details
	Number	
	Title	
6	Element	
U	Directory	m1/us
	Comment	US directory: In addition to the appropriate regional documents, the regional xml instance should be located in this folder. Refer to regional
		guidance for details
	Number	
	Title	
7	Element	1/
	Directory	m1/xx
	Comment	xx directory; where xx is a two character country code from ISO-3166-1. In addition to the appropriate regional documents, the regional xml instance should be located in this folder. Refer to regional guidance for details

	Number	2
	Title	Common Technical Document Summaries
8	Element	m2-common-technical-document-summaries
	Directory	m2
	Comment	
	Number	2.2
	Title	Introduction
9	Element	m2-2-introduction
	Directory	m2/22-intro
	Comment	
		2.2
		Introduction
10		m2-2-introduction
	File	m2/22-intro/introduction.pdf
	Comment	
	Number	2.3
	Title	Quality Overall Summary
11		m2-3-quality-overall-summary
1.1	Directory	m2/23-qos
	Comment	Refer to the Granularity Annex of the M4 Organisation Document for guidance on the flexibility of multiple documents for the Quality Overall Summary
	Number	2.3
	Title	Introduction
12	Element	m2-3-introduction
	File	m2/23-qos/introduction.pdf
	Comment	
13		2.3.S
		Drug Substance - Name - Manufacturer
	Element	m2-3-s-drug-substance
	File	m2/23-qos/drug-substance.pdf

	Comment	Refer to the Granularity Annex of the M4 Organisation Document for guidance on the flexibility of multiple documents for the Quality Overall Summary
		Where there are more than one drug substance and/or manufacturer, separate files can be provided for each.
	Number	2.3.P
	Title	Drug Product -Name
	Element	m2-3-p-drug-product
14	File	m2/23-qos/drug-product- <i>name</i> .pdf
1		Refer to the Granularity Annex of the M4 Organisation Document for guidance on the flexibility of multiple documents for the Quality
	Comment	Overall Summary
	Comment	Refer to regional guidance for definition of what constitutes a drug product and the acceptability of more than one drug product in an
		application. Where more than one drug product is acceptable in an application, a separate file can be provided for each drug product.
	Number	2.3.A
	Title	Appendices
15	Element	m2-3-a-appendices
10	File	m2/23-qos/appendices.pdf
	Comment	Refer to the Granularity Annex of the M4 Organisation Document for guidance on the flexibility of multiple documents for the Quality
	Comment	Overall Summary
	Number	2.3.R
	Title	Regional Information
16	Element	m2-3-r-regional-information
10	File	m2/23-qos/regional-information.pdf
	Comment	Refer to the Granularity Annex of the M4 Organisation Document for guidance on the flexibility of multiple documents for the Quality Overall Summary
	Number	2.4
	Title	Nonclinical Overview
17	Element	m2-4-nonclinical-overview
	Directory	m2/24-nonclin-over
	Comment	
	Number	2.4
	Title	Nonclinical Overview
1.0	Element	m2-4-nonclinical-overview
18	File	m2/24-nonclin-over/nonclinical-overview.pdf
	Comment	Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within the document to these sub-headings.

19	Number	2.5
	Title	Clinical Overview
	Element	m2-5-clinical-overview
	Directory	m2/25-clin-over
	Comment	
	Number	2.5
	Title	Clinical Overview
20	Element	m2-5-clinical-overview
20	File	m2/25-clin-over/clinical-overview.pdf
	Comment	Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within the document to these sub-headings.
	Number	2.6
	Title	Nonclinical Written and Tabulated Summaries
21	Element	m2-6-nonclinical-written-and-tabulated-summaries
	Directory	m2/26-nonclin-sum
	Comment	
	Number	2.6.1
	Title	Introduction
22		m2-6-1-introduction
	File	m2/26-nonclin-sum/introduction.pdf
	Comment	
		2.6.2
		Pharmacology Written Summary
23	Element	m2-6-2-pharmacology-written-summary
23	File	m2/26-nonclin-sum/pharmacol-written-summary.pdf
	Comment	Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within
		the document to these sub-headings.
		2.6.3
	Title	Pharmacology Tabulated Summary
24	Element	m2-6-3-pharmacology-tabulated-summary
	File	m2/26-nonclin-sum/pharmacol-tabulated-summary.pdf
		Should have further navigation via bookmarks
25	Number	2.6.4

	Title	Pharmacokinetics Written Summary
	Element	m2-6-4-pharmacokinetics-written-summary
	File	m2/26-nonclin-sum/pharmkin-written-summary.pdf
	Comment	Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within the document to these sub-headings.
	Number	2.6.5
	Title	Pharmacokinetics Tabulated Summary
26	Element	m2-6-5-pharmacokinetics-tabulated-summary
	File	m2/26-nonclin-sum/pharmkin-tabulated-summary.pdf
	Comment	Should have further navigation via bookmarks
	Number	2.6.6
	Title	Toxicology Written Summary
27	Element	m2-6-6-toxicology-written-summary
21	File	m2/26-nonclin-sum/toxicology-written-summary.pdf
	Comment	Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within
	Comment	the document to these sub-headings.
	Number	2.6.7
	Title	Toxicology Tabulated Summary
28	Element	m2-6-7-toxicology-tabulated-summary
	File	m2/26-nonclin-sum/toxicology-tabulated-summary.pdf
	Comment	Should have further navigation via bookmarks
	Number	2.7
	Title	Clinical Summary
29	Element	m2-7-clinical-summary
	Directory	m2/27-clin-sum
	Comment	
	Number	2.7.1
	Title	Summary of Biopharmaceutic Studies and Associated Analytical Methods
30	Element	m2-7-1-summary-of-biopharmaceutic-studies-and-associated-analytical-methods
30	File	m2/27-clin-sum/summary-biopharm.pdf
	Comment	Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within
		the document to these sub-headings.
31	Number	2.7.2
	Title	Summary of Clinical Pharmacology Studies

	Element	m2-7-2-summary-of-clinical-pharmacology-studies
	File	m2/27-clin-sum/summary-clin-pharm.pdf
	Comment	Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within the document to these sub-headings.
	Number	2.7.3
	Title	Summary of Clinical Efficacy – <i>Indication</i>
	Element	m2-7-3-summary-of-clinical-efficacy
	File	m2/27-clin-sum/summary-clin-efficacy-indication.pdf
32	Comment	The file name should always include the indication being claimed (abbreviated if appropriate) e.g., 'summary-clin-efficacy-asthma.pdf'. Where there is more than one indication (e.g., asthma & migraine) then the first indication has a file name 'summary-clin-efficacy-asthma.pdf' and the second 'summary-clin-efficacy-migraine.pdf'. Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within the document to these sub-headings. The 'indication' attribute in the backbone should be consistent with that used in the filename but can be different. For example, an 'indication' attribute value of 'Non-Small Cell Lung Cancer' could be expressed as 'NSCLC' in the filename for that document (i.e., summclineff-nsclc.pdf). There is currently no standard terminology list for 'indication' and applicants should choose these attributes carefully as they can not be easily changed during the life cycle of the application. The only way this can be accomplished currently is to delete all the leaf elements with the incorrect attribute value and provide new leaf elements for those files with the modified attribute value. Applicants should consult with the regional authority before attempting to modify these attributes to discuss the appropriateness of, and approach to be taken for, this type of change.
	Number	2.7.4
	Title	Summary of Clinical Safety
33	Element	m2-7-4-summary-of-clinical-safety
33	File	m2/27-clin-sum/summary-clin-safety.pdf
	Comment	Typically, this document should consist of a single file. The CTD defines further heading levels and navigation should be provided within the document to these sub-headings.
	Number	2.7.5
	Title	Literature References
34	Element	m2-7-5-literature-references
	File	m2/27-clin-sum/literature-references.pdf
	Comment	
35	Number	2.7.6
	Title	Synopses of Individual Studies
	Element	m2-7-6-synopses-of-individual-studies

	File	m2/27-clin-sum/synopses-indiv-studies.pdf
	Comment	These synopses should already be located in the Clinical Study Reports in Module 5 and should not, therefore, be repeated in Module 2. It is
ľ	Comment	considered sufficient to provide hyperlinks from the listing of the studies, located here, to the locations of the synopses in Module 5.

	Number	3
	Title	Quality
36	Element	m3-quality
	Directory	m3
	Comment	Refer to the Granularity Annex of the M4 Organisation Document for guidance on the flexibility of multiple documents for Module 3
	Number	3.2
	Title	Body of Data
37	Element	m3-2-body-of-data
	Directory	m3/32-body-data
	Comment	
	Number	3.2.S
	Title	Drug Substance
38	Element	m3-2-s-drug-substance
	Directory	m3/32-body-data/32s-drug-sub
	Comment	
	Number	3.2.S
	Title	Drug Substance - Drug Substance Name - Manufacturer
	Element	m3-2-s-drug-substance
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1
39		In this section, it can be helpful if the folder name includes the name of the drug substance and manufacturer. This applies particularly when there are multiple drug substances and/or manufacturers. When naming folders, attention should be paid to the length of the name of the folder on the overall length of the full path. Abbreviations can help control the length of the path.
	Comment	The 'substance' and 'manufacturer' attribute values in the backbone should be consistent with that used in the folder name but can be different. For example, a 'manufacturer' attribute value of 'Company XXX, City Name, Country Name' could be expressed as 'xxx' in the folder name. There is currently no standard terminology list for these attributes and applicants should choose these attributes carefully as they can not be easily changed during the life cycle of the application. The only way this can be accomplished currently is to delete all the leaf elements with the incorrect attribute value and provide new leaf elements for those files with the modified attribute value. Applicants should consult with the regional authority before attempting to modify these attributes to discuss the appropriateness of, and approach to be taken for, this type of change.
40	Number	3.2.S.1
	Title	General Information (name, manufacturer)

	Element	m3-2-s-1-general-information
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s1-gen-info
	Comment	
	Number	3.2.S.1.1
	Title	Nomenclature (name, manufacturer)
41	Element	m3-2-s-1-1-nomenclature
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s1-gen-info/nomenclature.pdf
	Comment	
	Number	3.2.S.1.2
	Title	Structure (name, manufacturer)
42	Element	m3-2-s-1-2-structure
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s1-gen-info/structure.pdf
	Comment	
	Number	3.2.S.1.3
	Title	General Properties (name, manufacturer)
43	Element	m3-2-s-1-3-general-properties
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s1-gen-info/general-properties.pdf
	Comment	
	Number	3.2.S.2
	Title	Manufacture (name, manufacturer)
44	Element	m3-2-s-2-manufacture
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s2-manuf
	Comment	
	Number	3.2.S.2.1
	Title	Manufacturer(s) (name, manufacturer)
45	Element	m3-2-s-2-1-manufacturer
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s2-manuf/manufacturer.pdf
	Comment	For this document there should be only information regarding one manufacturer
	Number	3.2.S.2.2
	Title	Description of Manufacturing Process and Process Controls (name, manufacturer)
46	Element	m3-2-s-2-description-of-manufacturing-process-and-process-controls
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s2-manuf/manuf-process-and-controls.pdf
	Comment	

	Number	3.2.S.2.3
	Title	Control of Materials (name, manufacturer)
47	Element	m3-2-s-2-3-control-of-materials
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s2-manuf/control-of-materials.pdf
	Comment	
	Number	3.2.S.2.4
	Title	Controls of Critical Steps and Intermediates (name, manufacturer)
48	Element	m3-2-s-2-4-controls-of-critical-steps-and-intermediates
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s2-manuf/control-critical-steps.pdf
	Comment	
	Number	3.2.S.2.5
	Title	Process Validation and/or Evaluation (name, manufacturer)
49	Element	m3-2-s-2-5-process-validation-and-or-evaluation
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s2-manuf/process-validation.pdf
	Comment	
	Number	3.2.S.2.6
	Title	Manufacturing Process Development (name, manufacturer)
50	Element	m3-2-s-2-6-manufacturing-process-development
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s2-manuf/manuf-process-development.pdf
	Comment	
	Number	3.2.S.3
	Title	Characterisation (name, manufacturer)
51	Element	m3-2-s-3-characterisation
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s3-charac
	Comment	
	Number	3.2.S.3.1
	Title	Elucidation of Structure and Other Characteristics (name, manufacturer)
52	Element	m3-2-s-3-1-elucidation-of-structure-and-other-characteristics
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s3-charac/elucidation-of-structure.pdf
50	Comment	
53	Number	3.2.8.3.2
	Title	Impurities (name, manufacturer)
	Element	m3-2-s-3-2-impurities

	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s3-charac/impurities.pdf
	Comment	
	Number	3.2.S.4
	Title	Control of Drug Substance (name, manufacturer)
54	Element	m3-2-s-4-control-of-drug-substance
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub
	Comment	
	Number	3.2.S.4.1
	Title	Specification (name, manufacturer)
55	Element	m3-2-s-4-1-specification
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s41-spec
	Comment	
	Number	3.2.S.4.1
	Title	Specification (name, manufacturer)
56	Element	m3-2-s-4-1-specification
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s41-spec/specification.pdf
	Comment	
	Number	3.2.S.4.2
	Title	Analytical Procedures (name, manufacturer)
57	Element	m3-2-s-4-2-analytical-procedures
37	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s42-analyt-proc
	Comment	The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, can be organized. CTD numbering is not defined below this level (e.g., 3.2.S.4.2.1).
	Number	
	Title	Analytical Procedure-1
58	Element	m3-2-s-4-2-analytical-procedures
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s42-analyt-proc/analytical-procedure-1.pdf
	Comment	
	Number	
	Title	Analytical Procedure-2
59	Element	m3-2-s-4-2-analytical-procedures
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s42-analyt-proc/analytical-procedure-2.pdf
	Comment	

60	Number	
	Title	Analytical Procedure-3
	Element	m3-2-s-4-2-analytical-procedures
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s42-analyt-proc/analytical-procedure-3.pdf
	Comment	
	Number	3.2.S.4.3
	Title	Validation of Analytical Procedures
61	Element	m3-2-s-4-3-validation-of-analytical-procedures (name, manufacturer)
01	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s43-val-analyt-proc
	Comment	The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, can be organized. CTD numbering is not defined below this level (e.g., 3.2.S.4.3.1).
	Number	
	Title	Validation of Analytical Procedure-1
62	Element	m3-2-s-4-3-validation-of-analytical-procedures
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s43-val-analyt-proc/validation-analyt-procedure-1.pdf
	Comment	
	Number	
	Title	Validation of Analytical Procedure-2
63	Element	m3-2-s-4-3-validation-of-analytical-procedures
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s43-val-analyt-proc/validation-analyt-procedure-2.pdf
	Comment	
	Number	
	Title	Validation of Analytical Procedure-3
64	Element	m3-2-s-4-3-validation-of-analytical-procedures
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s43-val-analyt-proc/validation-analyt-procedure-3.pdf
	Comment	
	Number	3.2.S.4.4
	Title	Batch Analyses (name, manufacturer)
65	Element	m3-2-s-4-batch-analyses
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s44-batch-analys
	Comment	
66	Number	3.2.S.4.4

	Title	Batch Analyses (name, manufacturer)
	Element	m3-2-s-4-4-batch-analyses
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s44-batch-analys/batch-analyses.pdf
	Comment	
	Number	3.2.S.4.5
	Title	Justification of Specification (name, manufacturer)
67	Element	m3-2-s-4-5-justification-of-specification
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s45-justif-spec
	Comment	
	Number	3.2.S.4.5
	Title	Justification of Specification (name, manufacturer)
68	Element	m3-2-s-4-5-justification-of-specification
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s4-contr-drug-sub/32s45-justif-spec/justification-of-specification.pdf
	Comment	
	Number	3.2.S.5
	Title	Reference Standards or Materials (name, manufacturer)
69	Element	m3-2-s-5-reference-standards-or-materials
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s5-ref-stand
	Comment	
	Number	3.2.S.5
	Title	Reference Standards or Materials (name, manufacturer)
70	Element	m3-2-s-5-reference-standards-or-materials
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s5-ref-stand/reference-standards.pdf
	Comment	Where a multiple file approach is taken for this section, the file names should indicate which reference standard is covered in the document.
	Number	3.2.S.6
	Title	Container Closure System (name, manufacturer)
71	Element	m3-2-s-6-container-closure-system
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s6-cont-closure-sys
	Comment	
72	Number	3.2.S.6
	Title	Container Closure System (name, manufacturer)
	Element	m3-2-s-6-container-closure-system
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s6-cont-closure-sys/container-closure-system.pdf

	Comment	
73	Number	3.2.S.7
	Title	Stability (name, manufacturer)
	Element	m3-2-s-7-stability
	Directory	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s7-stab
	Comment	
	Number	3.2.S.7.1
	Title	Stability Summary and Conclusions (name, manufacturer)
74	Element	m3-2-s-7-1-stability-summary-and-conclusions
	File	m3/32-body-data/32s-drug-sub/ <i>substance-1-manufacturer-1</i> /32s7-stab/stability-summary.pdf
	Comment	
	Number	3.2.S.7.2
	Title	Post-approval Stability Protocol and Stability Commitment (name, manufacturer)
75	Element	m3-2-s-7-2-post-approval-stability-protocol-and-stability-commitment
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s7-stab/postapproval-stability.pdf
	Comment	
	Number	3.2.S.7.3
	Title	Stability Data (name, manufacturer)
76	Element	m3-2-s-7-3-stability-data
	File	m3/32-body-data/32s-drug-sub/substance-1-manufacturer-1/32s7-stab/stability-data.pdf
	Comment	
	Number	3.2.P
	Title	Drug Product (name, dosage form)
77	Element	m3-2-p-drug-product
	Directory	m3/32-body-data/32p-drug-prod
	Comment	
78	Number	3.2.P
	Title	Drug Product (name, dosage form) – Name
	Element	m3-2-p-drug-product
	Directory	m3/32-body-data/32p-drug-prod/product-1

		In this section, it can be helpful if the folder name includes the name of the drug product. This applies particularly where there is more than one drug product (e.g., powder for reconstitution and diluent); the first drug product would have a folder 'powder-for-reconstitution' and the second, 'diluent'. Refer to regional guidance for definition of what constitutes a drug product and the acceptability of more than one drug product in an application.
	Comment	The 'product-name' attribute value in the backbone should be consistent with that used in the folder name but can be different. For example, a 'product-name' attribute value of 'Lyophilized Powder for Reconstitution' could be expressed as 'powder' in the folder name. There is currently no standard terminology list for these attributes and applicants should choose these attributes carefully as they can not be easily changed during the life cycle of the application. The only way this can be accomplished currently is to delete all the leaf elements with the incorrect attribute value and provide new leaf elements for those files with the modified attribute value. Applicants should consult with the regional authority before attempting to modify these attributes to discuss the appropriateness of, and approach to be taken for, this type of change.
	Number	3.2.P.1
	Title	Description and Composition of the Drug Product (name, dosage form)
79	Element	m3-2-p-1-description-and-composition-of-the-drug-product
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p1-desc-comp
	Comment	
	Number	3.2.P.1
	Title	Description and Composition of the Drug Product (name, dosage form)
80	Element	m3-2-p-1-description-and-composition-of-the-drug-product
	File	m3/32-body-data/32p-drug-prod/product-1/32p1-desc-comp/description-and-composition.pdf
	Comment	
	Number	3.2.P.2
	Title	Pharmaceutical Development (name, dosage form)
IX I	Element	m3-2-p-2-pharmaceutical-development
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p2-pharm-dev
	Comment	Refer to the M4 Organisation Document: Granularity Annex for guidance on the flexibility of multiple documents for the Pharmaceutical
		Development section.
82	Number	3.2.P.2
	Title	Pharmaceutical Development (name, dosage form)
	Element	m3-2-p-2-pharmaceutical-development
	File	m3/32-body-data/32p-drug-prod/product-1/32p2-pharm-dev/pharmaceutical-development.pdf

		Defeated MACO in the December Complete Association of Complete Com
	Comment	Refer to the M4 Organisation Document: Granularity Annex for guidance on the flexibility of multiple documents for the Pharmaceutical
<u> </u>		Development section.
83	Number	3.2.P.3
	Title	Manufacture (name, dosage form)
	Element	m3-2-p-3-manufacture
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p3-manuf
	Comment	
	Number	3.2.P.3.1
	Title	Manufacturer(s) (name, dosage form)
84	Element	m3-2-p-3-1-manufacturers
	File	m3/32-body-data/32p-drug-prod/product-1/32p3-manuf/manufacturers.pdf
	Comment	
	Number	3.2.P.3.2
	Title	Batch Formula (name, dosage form)
85	Element	m3-2-p-3-2-batch-formula
	File	m3/32-body-data/32p-drug-prod/product-1/32p3-manuf/batch-formula.pdf
	Comment	
	Number	3.2.P.3.3
	Title	Description of Manufacturing Process and Process Controls (name, dosage form)
86	Element	m3-2-p-3-3-description-of-manufacturing-process-and-process-controls
	File	m3/32-body-data/32p-drug-prod/product-1/32p3-manuf/manuf-process-and-controls.pdf
	Comment	
	Number	3.2.P.3.4
	Title	Controls of Critical Steps and Intermediates (name, dosage form)
87	Element	m3-2-p-3-4-controls-of-critical-steps-and-intermediates
	File	m3/32-body-data/32p-drug-prod/product-1/32p3-manuf/control-critical-steps.pdf
	Comment	
	Number	3.2.P.3.5
	Title	Process Validation and/or Evaluation (name, dosage form)
88	Element	m3-2-p-3-5-process-validation-and-or-evaluation
	File	m3/32-body-data/32p-drug-prod/product-1/32p3-manuf/process-validation.pdf
	Comment	The applicant has the option to submit one or multiple files, one for each validation or evaluation.

89	Number	3.2.P.4
	Title	Control of Excipients (name, dosage form)
	Element	m3-2-p-4-control-of-excipients
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p4-contr-excip
	Comment	
	Number	3.2.P.4
	Title	Control of Excipients (name, dosage form) – Excipient
	Element	m3-2-p-4-control-of-excipients
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p4-contr-excip/excipient-1
90	Comment	For a drug product containing more than one excipient, the information requested for sections 3.2.P.4.1 – 3.2.P.4.4 should be provided in its entirety for each excipient. Refer to the ICH eCTD QA and Change Requests document, Q&A No.4 for additional suggestions on structuring this section. For compendial excipient(s) without additional specification tests, it is appropriate to have all information in one file, making sure to introduce a folder for each of new documents to avoid mixing files and folders at the same level. Non-compendial excipients should follow the structure outlined below. The 'excipient' attribute value in the backbone should be consistent with that used in the folder name but can be different. There is currently no standard terminology list for these attributes and applicants should choose these attributes carefully as they can not be easily changed during the life cycle of the application. The only way this can be accomplished currently is to delete all the leaf elements with the incorrect attribute value and provide new leaf elements for those files with the modified attribute value. Applicants should consult with the regional authority before attempting to modify these attributes to discuss the appropriateness of, and approach to be taken for, this type of change.
	Number	3.2.P.4.1
	Title	Specifications (name, dosage form)
91	Element	m3-2-p-4-1-specifications
	File	m3/32-body-data/32p-drug-prod/product-1/32p4-contr-excip/excipient-1/specifications.pdf
	Comment	See comment under 3.2.P.4.
	Number	3.2.P.4.2
92	Title	Analytical Procedures (name, dosage form)
	Element	m3-2-p-4-2-analytical-procedures
	File	m3/32-body-data/32p-drug-prod/product-1/32p4-contr-excip/excipient-1/analytical-procedures.pdf
	Comment	See comment under 3.2.P.4.
93	Number	3.2.P.4.3
	Title	Validation of Analytical Procedures (name, dosage form)
	Element	m3-2-p-4-3-validation-of-analytical-procedures

	File	m3/32-body-data/32p-drug-prod/product-1/32p4-contr-excip/excipient-1/validation-analyt-procedures.pdf
	Comment	See comment under 3.2.P.4.
94	Number	3.2.P.4.4
	Title	Justification of Specifications (name, dosage form)
	Element	m3-2-p-4-4-justification-of-specifications
	File	m3/32-body-data/32p-drug-prod/product-1/32p4-contr-excip/excipient-1/justification-of-specifications.pdf
	Comment	See comment under 3.2.P.4.
	Number	3.2.P.4.5
	Title	Excipients of Human or Animal Origin (name, dosage form)
95	Element	m3-2-p-4-5-excipients-of-human-or-animal-origin
	File	m3/32-body-data/32p-drug-prod/product-1/32p4-contr-excip/excipients-human-animal.pdf
	Comment	
	Number	3.2.P.4.6
	Title	Novel Excipients (name, dosage form)
96	Element	m3-2-p-4-6-novel-excipients
	File	m3/32-body-data/32p-drug-prod/product-1/32p4-contr-excip/novel-excipients.pdf
	Comment	
	Number	3.2.P.5
	Title	Control of Drug Product (name, dosage form)
97	Element	m3-2-p-5-control-of-drug-product
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod
	Comment	
	Number	3.2.P.5.1
	Title	Specification(s) (name, dosage form)
98	Element	m3-2-p-5-1-specifications
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p51-spec
	Comment	
	Number	3.2.P.5.1
	Title	Specification(s) (name, dosage form)
	Element	m3-2-p-5-1-specifications
	File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p51-spec/specifications.pdf
	Comment	
100	Number	3.2.P.5.2

Element m3-2-p-5-2-analytical-procedures m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.2.1). Number Title Analytical Procedure - 1 Mumber Title Analytical Procedure - 2		Title	Analytical Procedures (name, dosage form)
Comment Number Title Analytical Procedure — 1 Element m3-2-p-5-2-analytical-procedures File m3-2-p-5-3-validation-of-analytical-procedures File Validation of Analytical Procedures File validation of Analytical-procedures File m3-2-p-5-3-validation-of-analytical-procedures		Element	m3-2-p-5-2-analytical-procedures
Number Title Analytical Procedure - I		Directory	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc
Title Malytical Procedure – I Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-1.pdf Number Title Analytical Procedure – 2 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-2.pdf Comment Number Title Analytical Procedure – 3 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.p-5-3-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.p-5-3-validation-of-analytical-procedures File validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures File validation of Analytical Procedures (name, dosage form) Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures File validation of Analytical Procedures Interval Sulidation Interval S		Comment	The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized. CTD numbering is not defined below this level (e.g., 3.2.P.5.2.1).
Element m3-2-p-5-2-analytical-procedures		Number	
File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-1.pdf Number Title Analytical Procedure — 2 Element m3-2-p.5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-2.pdf Comment Number Title Analytical Procedure — 3 Element m3-2-p.5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number Title Validation of Analytical Procedures (name, dosage form) Element Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment Comment Title Validation of Analytical Procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures — I Element m3-2-p.5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Title	Analytical Procedure – 1
Comment Number Title Analytical Procedure - 2 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-2.pdf Comment Number Title Analytical Procedure - 3 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number S.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Title Validation of Analytical Procedures Element m3-2-p-5-3-validation-of-analytical-procedures Title Validation of Analytical Procedures Items Title Validation of Analytical Procedures Items Val	101	Element	
Number Title Analytical Procedure - 2 Element m3-2-p-5-2-analytical-procedures m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-2.pdf Comment Number Title Analytical Procedure - 3 Element m3-2-p-5-2-analytical-procedures m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures - 1 Element m3-2-p-5-3-validation-of-analytical-procedures Element m3		File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-1.pdf
Title Analytical Procedure - 2 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-2.pdf Comment Number Title Analytical Procedure - 3 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures - 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Comment	
Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-2.pdf Comment Number Title Analytical Procedure - 3 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures - 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Number	
File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-2.pdf Number Title Analytical Procedure — 3 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures — 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Title	Analytical Procedure – 2
Comment Number Title Analytical Procedure – 3 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment Title example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf	102	Element	
Number Title Analytical Procedure – 3 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-2.pdf
Title Analytical Procedure – 3 Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Comment	
Element m3-2-p-5-2-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Number	
File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment Title validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Title	Analytical Procedure – 3
Comment Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf	103	Element	m3-2-p-5-2-analytical-procedures
Number 3.2.P.5.3 Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p52-analyt-proc/analytical-procedure-3.pdf
Title Validation of Analytical Procedures (name, dosage form) Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Comment	
Element m3-2-p-5-3-validation-of-analytical-procedures Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Number	
Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Title	
Directory m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc Comment The example below shows how a multiple file approach, where a separate file is provided for each analytical procedure, may be organized CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf	104	Element	· · ·
CTD numbering is not defined below this level (e.g., 3.2.P.5.3.1). Number Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf	104	Directory	
Title Validation of Analytical Procedures – 1 Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Comment	
Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Number	
Element m3-2-p-5-3-validation-of-analytical-procedures File m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-1.pdf		Title	Validation of Analytical Procedures – 1
	105	Element	
		File	· · ·
		Comment	
106 Number	106	Number	
Title Validation of Analytical Procedures – 2		Title	Validation of Analytical Procedures – 2

	Element	m3-2-p-5-3-validation-of-analytical-procedures
	File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-2.pdf
	Comment	
107	Number	
	Title	Validation of Analytical Procedures – 3
	Element	m3-2-p-5-3-validation-of-analytical-procedures
	File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p53-val-analyt-proc/validation-analytical-procedures-3.pdf
	Comment	
	Number	3.2.P.5.4
	Title	Batch Analyses (name, dosage form)
108	Element	m3-2-p-5-4-batch-analyses
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p54-batch-analys
	Comment	
	Number	3.2.P.5.4
	Title	Batch Analyses (name, dosage form)
109	Element	m3-2-p-5-4-batch-analyses
	File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p54-batch-analys/batch-analyses.pdf
	Comment	
	Number	3.2.P.5.5
	Title	Characterisation of Impurities (name, dosage form)
110	Element	m3-2-p-5-5-characterisation-of-impurities
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p55-charac-imp
	Comment	
	Number	3.2.P.5.5
	Title	Characterisation of Impurities (name, dosage form)
111	Element	m3-2-p-5-5-characterisation-of-impurities
	File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p55-charac-imp/characterisation-impurities.pdf
	Comment	
112	Number	3.2.P.5.6
	Title	Justification of Specifications (name, dosage form)
	Element	m3-2-p-5-6-justification-of-specifications
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p56-justif-spec
	Comment	

113	Number	3.2.P.5.6
	Title	Justification of Specifications (name, dosage form)
	Element	m3-2-p-5-6-justification-of-specifications
	File	m3/32-body-data/32p-drug-prod/product-1/32p5-contr-drug-prod/32p56-justif-spec/justification-of-specifications.pdf
	Comment	
114	Number	3.2.P.6
	Title	Reference Standards or Materials (name, dosage form)
	Element	m3-2-p-6-reference-standards-or-materials
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p6-ref-stand
	Comment	
	Number	3.2.P.6
	Title	Reference Standards or Materials (name, dosage form)
115	Element	m3-2-p-6-reference-standards-or-materials
	File	m3/32-body-data/32p-drug-prod/product-1/32p6-ref-stand/reference-standards.pdf
	Comment	When a multiple file approach is taken for this section, the file names should indicate which reference standard is covered in the document.
	Number	3.2.P.7
	Title	Container Closure System (name, dosage form)
116	Element	m3-2-p-7-container-closure-system
	Directory	m3/32-body-data/32p-drug-prod/ <i>product-1</i> /32p7-cont-closure-sys
	Comment	
	Number	3.2.P.7
	Title	Container Closure System (name, dosage form)
117	Element	m3-2-p-7-container-closure-system
	File	m3/32-body-data/32p-drug-prod/product-1/32p7-cont-closure-sys/container-closure-system.pdf
	Comment	
	Number	3.2.P.8
	Title	Stability (name, dosage form)
	Element	m3-2-p-8-stability
	Directory	m3/32-body-data/32p-drug-prod/product-1/32p8-stab
	Comment	
119	Number	3.2.P.8.1
	Title	Stability Summary and Conclusion (name, dosage form)
	Element	m3-2-p-8-1-stability-summary-and-conclusion

	File	m3/32-body-data/32p-drug-prod/product-1/32p8-stab/stability-summary.pdf
	Comment	
120	Number	3.2.P.8.2
	Title	Post-approval Stability Protocol and Stability Commitment (name, dosage form)
	Element	m3-2-p-8-2-post-approval-stability-protocol-and-stability-commitment
	File	m3/32-body-data/32p-drug-prod/product-1/32p8-stab/postapproval-stability.pdf
	Comment	
	Number	3.2.P.8.3
	Title	Stability Data (name, dosage form)
121	Element	m3-2-p-8-3-stability-data
	File	m3/32-body-data/32p-drug-prod/product-1/32p8-stab/stability-data.pdf
	Comment	
	Number	3.2.A
	Title	Appendices
122	Element	m3-2-a-appendices
	Directory	m3/32-body-data/32a-app
	Comment	
	Number	3.2.A.1
	Title	Facilities and Equipment (name, manufacturer)
	Element	m3-2-a-1-facilities-and-equipment
123	Directory	m3/32-body-data/32a-app/32a1-fac-equip
	Comment	Several reports are likely to be included in this appendix. The organisation is left to the applicant to define. However, where there is more than one manufacturer a folder should be created for each manufacturer and the identity of the manufacturer included in the directory name. CTD numbering is not defined below this level (e.g., 3.2.A.1.1).
	Number	
	Title	Facilities and Equipment Report 1
124	Element	m3-2-a-1-facilities-and-equipment
	File	m3/32-body-data/32a-app/32a1-fac-equip/facilities-and-equipment-report-1.pdf
	Comment	
125	Number	
	Title	Facilities and Equipment Report 2
	Element	m3-2-a-1-facilities-and-equipment
	File	m3/32-body-data/32a-app/32a1-fac-equip/facilities-and-equipment-report-2.pdf

	Comment	
	Number	
	Title	Facilities and Equipment Report 3
126	Element	m3-2-a-1-facilities-and-equipment
	File	m3/32-body-data/32a-app/32a1-fac-equip/facilities-and-equipment-report-3.pdf
	Comment	
	Number	3.2.A.2
	Title	Adventitious Agents Safety Evaluation (name, dosage form, manufacturer)
	Element	m3-2-a-2-adventitious-agents-safety-evaluation
127	Directory	m3/32-body-data/32a-app/32a2-advent-agent
	Comment	Nonviral adventitious agents reports should be placed in this folder. For viral adventitious agents the following sub-folder structure should be used. However, where there is more than one drug substance, drug product, manufacturer etc., a directory should be created for each option and its identity included in the directory name. CTD numbering is not defined below this level (e.g., 3.2.A.2.1).
	Number	
	Title	Adventitious Agents Safety Evaluation Report 1
128	Element	m3-2-a-2-adventitious-agents-safety-evaluation
	File	m3/32-body-data/32a-app/32a2-advent-agent/adventitious-agents-report-1.pdf
	Comment	
	Number	
	Title	Adventitious Agents Safety Evaluation Report 2
129	Element	m3-2-a-2-adventitious-agents-safety-evaluation
	File	m3/32-body-data/32a-app/32a2-advent-agent/adventitious-agents-report-2.pdf
	Comment	
	Number	
	Title	Adventitious Agents Safety Evaluation Report 3
130	Element	m3-2-a-2-adventitious-agents-safety-evaluation
	File	m3/32-body-data/32a-app/32a2-advent-agent/adventitious-agents-report-3.pdf
	Comment	
131	Number	3.2.A.3
	Title	Excipients – Name
	Element	m3-2-a-3-excipients
	Directory	m3/32-body-data/32a-app/32a3-excip-name-1

	Comment	The name of any novel excipient should be included in the folder name. If there is more than one novel excipient then each folder should have unique identification through the use of different names e.g., '32a3-excip-name-1' and '32a3-excip-name-2'.
		The directory/file structure would typically follow that of the drug substance section in Module 3.2.S. Refer to regional guidances for the need for such information to be included in the submission directly as opposed to its inclusion in a Drug Master File.
	Number	3.2.R
	Title	Regional Information
132	Element	m3-2-r-regional-information
	Directory	m3/32-body-data/32r-reg-info
	Comment	Refer to the M4 Organisation Document: Granularity Annex for the approach to take with this section.
	Number	3.3
	Title	Literature References
133	Element	m3-3-literature-references
133	Directory	m3/33-lit-ref
	Comment	Copies of literature references should ordinarily be submitted as individual files (i.e., one for each reference). CTD numbering is not defined below this level (e.g., 3.3.1).
	Number	
	Title	Reference 1
134	Element	m3-3-literature-references
	File	m3/33-lit-ref/reference-1.pdf
	Comment	
	Number	
	Title	Reference 2
135	Element	m3-3-literature-references
	File	m3/33-lit-ref/reference-2.pdf
	Comment	
	Number	
	Title	Reference 3
136	Element	m3-3-literature-references
	File	m3/33-lit-ref/reference-3.pdf
	Comment	

	Number	4
	Title	Nonclinical Study Reports
127		m4-nonclinical-study-reports
137		m4
	Comment	1114
		4.2
		4.2
		Study Reports
138	Element	m4-2-study-reports
	Directory	m4/42-stud-rep
	Comment	
	Number	4.2.1
	Title	Pharmacology
139	Element	m4-2-1-pharmacology
	Directory	m4/42-stud-rep/421-pharmacol
	Comment	
	Number	4.2.1.1
		Primary Pharmacodynamics
140	Element	m4-2-1-1-primary-pharmacodynamics
	Directory	m4/42-stud-rep/421-pharmacol/4211-prim-pd
	Comment	
141	Number	
	Title	Study Report 1
	Element	m4-2-1-1-primary-pharmacodynamics
	File	m4/42-stud-rep/421-pharmacol/4211-prim-pd/study-report-1.pdf

		This comment is applicable to all study reports in Module 4.
	Comment	A single file can be provided for each study report document in Module 4. However, where the study report is large (e.g., a carcinogenicity study) the applicant can choose to submit the report as more than one file. In this case the text portion of the report should be one file and the appendices can be one or more files. In choosing the level of granularity for these reports, the applicant should consider that, when relevant information is changed at any point in the product's life cycle, replacements of complete files should be provided. Where submission as a collection of multiple files is used it is recommended that a directory is created at the study report level and the relevant files included within the directory.
		It is possible to have the additional graphical file(s) inserted directly into the PDF file, thus making management of the file easier. Alternatively, the applicant can choose to manage graphical files independently.
		Individual studies and files do not have specific CTD numbers.
	Number	
	Title	Study Report 2
142	Element	m4-2-1-1-primary-pharmacodynamics
	File	m4/42-stud-rep/421-pharmacol/4211-prim-pd/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
143	Element	m4-2-1-1-primary-pharmacodynamics
	File	m4/42-stud-rep/421-pharmacol/4211-prim-pd/study-report-3.pdf
	Comment	
	1 (0,1110 01	4.2.1.2
	Title	Secondary Pharmacodynamics
		m4-2-1-2-secondary-pharmacodynamics
		m4/42-stud-rep/421-pharmacol/4212-sec-pd
	Comment	
	Number	
	Title	Study Report 1
		m4-2-1-2-secondary-pharmacodynamics
	File	m4/42-stud-rep/421-pharmacol/4212-sec-pd/study-report-1.pdf
	Comment	
146	Number	

	Title	Study Report 2
	Element	m4-2-1-2-secondary-pharmacodynamics
	File	m4/42-stud-rep/421-pharmacol/4212-sec-pd/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
147	Element	m4-2-1-2-secondary-pharmacodynamics
	File	m4/42-stud-rep/421-pharmacol/4212-sec-pd/study-report-3.pdf
	Comment	
	Number	4.2.1.3
	Title	Safety Pharmacology
148	Element	m4-2-1-3-safety-pharmacology
	Directory	m4/42-stud-rep/421-pharmacol/4213-safety-pharmacol
	Comment	
	Number	
	Title	Study Report 1
149	Element	m4-2-1-3-safety-pharmacology
	File	m4/42-stud-rep/421-pharmacol/4213-safety-pharmacol/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
	Element	m4-2-1-3-safety-pharmacology
	File	m4/42-stud-rep/421-pharmacol/4213-safety-pharmacol/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
	Element	m4-2-1-3-safety-pharmacology
	File	m4/42-stud-rep/421-pharmacol/4213-safety-pharmacol/study-report-3.pdf
	Comment	
	Number	4.2.1.4
	Title	Pharmacodynamic Drug Interactions
	Element	m4-2-1-4-pharmacodynamic-drug-interactions
	Directory	m4/42-stud-rep/421-pharmacol/4214-pd-drug-interact

	Comment	
	Number	
	Title	Study Report 1
		m4-2-1-4-pharmacodynamic-drug-interactions
	File	m4/42-stud-rep/421-pharmacol/4214-pd-drug-interact/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
154	Element	m4-2-1-4-pharmacodynamic-drug-interactions
	File	m4/42-stud-rep/421-pharmacol/4214-pd-drug-interact/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
155	Element	m4-2-1-4-pharmacodynamic-drug-interactions
	File	m4/42-stud-rep/421-pharmacol/4214-pd-drug-interact/study-report-3.pdf
	Comment	
	Number	4.2.2
	Title	Pharmacokinetics
156	Element	m4-2-2-pharmacokinetics
	Directory	m4/42-stud-rep/422-pk
	Comment	
	Number	4.2.2.1
	Title	Analytical Methods and Validation Reports (if separate reports are available)
157	Element	m4-2-2-1-analytical-methods-and-validation-reports
	Directory	m4/42-stud-rep/422-pk/4221-analyt-met-val
	Comment	
	Number	
	Title	Study Report 1
158	Element	m4-2-2-1-analytical-methods-and-validation-reports
	File	m4/42-stud-rep/422-pk/4221-analyt-met-val/ <i>study-report-1.pdf</i>
	Comment	
159	Number	
	Title	Study Report 2

	Element	m4-2-2-1-analytical-methods-and-validation-reports
	File	m4/42-stud-rep/422-pk/4221-analyt-met-val/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
160	Element	m4-2-2-1-analytical-methods-and-validation-reports
	File	m4/42-stud-rep/422-pk/4221-analyt-met-val/study-report-3.pdf
	Comment	
	Number	4.2.2.2
	Title	Absorption
161	Element	m4-2-2-absorption
	Directory	m4/42-stud-rep/422-pk/4222-absorp
	Comment	
	Number	
	Title	Study Report 1
162	Element	m4-2-2-absorption
	File	m4/42-stud-rep/422-pk/4222-absorp/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
163	Element	m4-2-2-absorption
	File	m4/42-stud-rep/422-pk/4222-absorp/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
	Element	m4-2-2-absorption
	File	m4/42-stud-rep/422-pk/4222-absorp/study-report-3.pdf
	Comment	
	Number	4.2.2.3
	Title	Distribution
	Element	m4-2-2-3-distribution
	Directory	m4/42-stud-rep/422-pk/4223-distrib
	Comment	

	Number	
	Title	Study Report 1
166		m4-2-2-3-distribution
	File	m4/42-stud-rep/422-pk/4223-distrib/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
167	Element	m4-2-2-3-distribution
	File	m4/42-stud-rep/422-pk/4223-distrib/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
168		m4-2-2-3-distribution
	File	m4/42-stud-rep/422-pk/4223-distrib/study-report-3.pdf
	Comment	
		4.2.2.4
		Metabolism
169	Element	m4-2-2-4-metabolism
	Directory	m4/42-stud-rep/422-pk/4224-metab
	Comment	
	Number	
		Study Report 1
		m4-2-2-4-metabolism
	File	m4/42-stud-rep/422-pk/4224-metab/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
		m4-2-2-4-metabolism
'	File	m4/42-stud-rep/422-pk/4224-metab/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
	Element	m4-2-2-4-metabolism

	File	m4/42-stud-rep/422-pk/4224-metab/study-report-3.pdf
	Comment	
	Number	4.2.2.5
	Title	Excretion
173	Element	m4-2-2-5-excretion
	Directory	m4/42-stud-rep/422-pk/4225-excr
	Comment	
	Number	
	Title	Study Report 1
174	Element	m4-2-2-5-excretion
	File	m4/42-stud-rep/422-pk/4225-excr/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
175	Element	m4-2-2-5-excretion
	File	m4/42-stud-rep/422-pk/4225-excr/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
176	Element	m4-2-2-5-excretion
	File	m4/42-stud-rep/422-pk/4225-excr/study-report-3.pdf
	Comment	
	Number	4.2.2.6
	Title	Pharmacokinetic Drug Interactions (nonclinical)
177	Element	m4-2-2-6-pharmacokinetic-drug-interactions
	Directory	m4/42-stud-rep/422-pk/4226-pk-drug-interact
	Comment	
	Number	
	Title	Study Report 1
178	Element	m4-2-2-6-pharmacokinetic-drug-interactions
	File	m4/42-stud-rep/422-pk/4226-pk-drug-interact/study-report-1.pdf
	Comment	
179	Number	

	Title	Study Report 2
	Element	m4-2-2-6-pharmacokinetic-drug-interactions
	File	m4/42-stud-rep/422-pk/4226-pk-drug-interact/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
180	Element	m4-2-2-6-pharmacokinetic-drug-interactions
	File	m4/42-stud-rep/422-pk/4226-pk-drug-interact/study-report-3.pdf
	Comment	
		4.2.2.7
	Title	Other Pharmacokinetic Studies
181	Element	m4-2-2-7-other-pharmacokinetic-studies
	Directory	m4/42-stud-rep/422-pk/4227-other-pk-stud
	Comment	
	Number	
	Title	Study Report 1
182	Element	m4-2-2-7-other-pharmacokinetic-studies
	File	m4/42-stud-rep/422-pk/4227-other-pk-stud/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
183	Element	m4-2-2-7-other-pharmacokinetic-studies
	File	m4/42-stud-rep/422-pk/4227-other-pk-stud/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
184	Element	m4-2-2-7-other-pharmacokinetic-studies
	File	m4/42-stud-rep/422-pk/4227-other-pk-stud/study-report-3.pdf
	Comment	
	Number	4.2.3
	Title	Toxicology
	Element	m4-2-3-toxicology
	Directory	m4/42-stud-rep/423-tox

	Comment	
	Number	4.2.3.1
	Title	Single-Dose Toxicity (in order by species, by route)
	Element	m4-2-3-1-single-dose-toxicity
	Directory	m4/42-stud-rep/423-tox/4231-single-dose-tox
	Comment	
	Number	
	Title	Study Report 1
187	Element	m4-2-3-1-single-dose-toxicity
	File	m4/42-stud-rep/423-tox/4231-single-dose-tox/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
188	Element	m4-2-3-1-single-dose-toxicity
	File	m4/42-stud-rep/423-tox/4231-single-dose-tox/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
189	Element	m4-2-3-1-single-dose-toxicity
	File	m4/42-stud-rep/423-tox/4231-single-dose-tox/study-report-3.pdf
	Comment	
		4.2.3.2
	Title	Repeat-Dose Toxicity (in order by species, by route, by duration, including supportive toxicokinetics evaluations)
190	Element	m4-2-3-2-repeat-dose-toxicity
		m4/42-stud-rep/423-tox/4232-repeat-dose-tox
	Comment	
	Number	
	Title	Study Report 1
		m4-2-3-2-repeat-dose-toxicity
	File	m4/42-stud-rep/423-tox/4232-repeat-dose-tox/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2

	Element	m4-2-3-2-repeat-dose-toxicity
	File	m4/42-stud-rep/423-tox/4232-repeat-dose-tox/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
193	Element	m4-2-3-2-repeat-dose-toxicity
	File	m4/42-stud-rep/423-tox/4232-repeat-dose-tox/study-report-3.pdf
	Comment	
	Number	4.2.3.3
	Title	Genotoxicity
194		m4-2-3-3-genotoxicity
	Directory	m4/42-stud-rep/423-tox/4233-genotox
	Comment	
		4.2.3.3.1
		In vitro
195		m4-2-3-3-1-in-vitro
	Directory	m4/42-stud-rep/423-tox/4233-genotox/42331-in-vitro
	Comment	
	Number	
		Study Report 1
196		m4-2-3-3-1-in-vitro
	File	m4/42-stud-rep/423-tox/4233-genotox/42331-in-vitro/study-report-1.pdf
	Comment	
	Number	
		Study Report 2
197		m4-2-3-3-1-in-vitro
	File	m4/42-stud-rep/423-tox/4233-genotox/42331-in-vitro/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
198	Element	m4-2-3-3-1-in-vitro
	File	m4/42-stud-rep/423-tox/4233-genotox/42331-in-vitro/study-report-3.pdf
	Comment	

199	Number	4.2.3.3.2
	Title	In vivo (including supportive toxicokinetics evaluations)
	Element	m4-2-3-3-2-in-vivo
	Directory	m4/42-stud-rep/423-tox/4233-genotox/42332-in-vivo
	Comment	
	Number	
	Title	Study Report 1
200	Element	m4-2-3-3-2-in-vivo
	File	m4/42-stud-rep/423-tox/4233-genotox/42332-in-vivo/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
201	Element	m4-2-3-3-2-in-vivo
	File	m4/42-stud-rep/423-tox/4233-genotox/42332-in-vivo/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
202	Element	m4-2-3-3-2-in-vivo
	File	m4/42-stud-rep/423-tox/4233-genotox/42332-in-vivo/study-report-3.pdf
	Comment	
		4.2.3.4
	Title	Carcinogenicity (including supportive toxicokinetics evaluations)
203		m4-2-3-4-carcinogenicity
	Directory	m4/42-stud-rep/423-tox/4234-carcigen
	Comment	
	Number	4.2.3.4.1
	Title	Long-term studies (in order by species, including range-finding studies that cannot be appropriately included under repeat-dose toxicity or pharmacokinetics)
204	Element	m4-2-3-4-1-long-term-studies
		m4/42-stud-rep/423-tox/4234-carcigen/42341-lt-stud
	Comment	
205	Number	
	Title	Study Report 1

	Element	m4-2-3-4-1-long-term-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42341-lt-stud/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
206	Element	m4-2-3-4-1-long-term-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42341-lt-stud/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
207	Element	m4-2-3-4-1-long-term-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42341-lt-stud/ <i>study-report-3.pdf</i>
	Comment	
	Number	4.2.3.4.2
208	Title	Short- or medium-term studies (including range-finding studies that cannot be appropriately included under repeat-dose toxicity or pharmacokinetics)
208	Element	m4-2-3-4-2-short-or-medium-term-studies
	Directory	m4/42-stud-rep/423-tox/4234-carcigen/42342-smt-stud
	Comment	
	Number	
	Title	Study Report 1
209	Element	m4-2-3-4-2-short-or-medium-term-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42342-smt-stud/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
210		m4-2-3-4-2-short-or-medium-term-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42342-smt-stud/study-report-2.pdf
	Comment	
211	Number	
1	Title	Study Report 3
		m4-2-3-4-2-short-or-medium-term-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42342-smt-stud/study-report-3.pdf

	Comment	
		4.2.3.4.3
	Title	Other studies
		m4-2-3-4-3-other-studies
		m4/42-stud-rep/423-tox/4234-carcigen/42343-other-stud
	Comment	
	Number	
	Title	Study Report 1
213	Element	m4-2-3-4-3-other-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42343-other-stud/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
214	Element	m4-2-3-4-3-other-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42343-other-stud/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
215	Element	m4-2-3-4-3-other-studies
	File	m4/42-stud-rep/423-tox/4234-carcigen/42343-other-stud/study-report-3.pdf
	Comment	
		4.2.3.5
		Reproductive and Developmental Toxicity (including range-finding studies and supportive toxicokinetics evaluations) (If modified study
216		designs are used, the following subheadings should be modified accordingly)
	Element	m4-2-3-5-reproductive-and-developmental-toxicity
		m4/42-stud-rep/423-tox/4235-repro-dev-tox
	Comment	
		4.2.3.5.1
		Fertility and early embryonic development
		m4-2-3-5-1-fertility-and-early-embryonic-development
		m4/42-stud-rep/423-tox/4235-repro-dev-tox/42351-fert-embryo-dev
	Comment	
218	Number	

	Title	Study Report 1
	Element	m4-2-3-5-1-fertility-and-early-embryonic-development
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42351-fert-embryo-dev/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
219	Element	m4-2-3-5-1-fertility-and-early-embryonic-development
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42351-fert-embryo-dev/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
220	Element	m4-2-3-5-1-fertility-and-early-embryonic-development
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42351-fert-embryo-dev/study-report-3.pdf
	Comment	
	Number	4.2.3.5.2
		Embryo-fetal development
221	Element	m4-2-3-5-2-embryo-fetal-development
	Directory	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42352-embryo-fetal-dev
	Comment	
	Number	
	Title	Study Report 1
222	Element	m4-2-3-5-2-embryo-fetal-development
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42352-embryo-fetal-dev/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
223	Element	m4-2-3-5-2-embryo-fetal-development
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42352-embryo-fetal-dev/study-report-2.pdf
	Comment	
224	Number	
	Title	Study Report 3
	Element	m4-2-3-5-2-embryo-fetal-development
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42352-embryo-fetal-dev/study-report-3.pdf

	Comment	
	Number	4.2.3.5.3
		Prenatal and postnatal development, including maternal function
		m4-2-3-5-3-prenatal-and-postnatal-development-including-maternal-function
	Directory	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42353-pre-postnatal-dev
	Comment	
	Number	
	Title	Study Report 1
226	Element	m4-2-3-5-3-prenatal-and-postnatal-development-including-maternal-function
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42353-pre-postnatal-dev/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
227	Element	m4-2-3-5-3-prenatal-and-postnatal-development-including-maternal-function
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42353-pre-postnatal-dev/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
228	Element	m4-2-3-5-3-prenatal-and-postnatal-development-including-maternal-function
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42353-pre-postnatal-dev/study-report-3.pdf
	Comment	
	Number	4.2.3.5.4
	Title	Studies in which the offspring (juvenile animals) are dosed and/or further evaluated
229	Element	m4-2-3-5-4-studies-in-which-the-offspring-juvenile-animals-are-dosed-and-or-further-evaluated
	Directory	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42354-juv
	Comment	
	Number	
	Title	Study Report 1
	Element	m4-2-3-5-4-studies-in-which-the-offspring-juvenile-animals-are-dosed-and-or-further-evaluated
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42354-juv/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2

	Element	m4-2-3-5-4-studies-in-which-the-offspring-juvenile-animals-are-dosed-and-or-further-evaluated
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42354-juv/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
232	Element	m4-2-3-5-4-studies-in-which-the-offspring-juvenile-animals-are-dosed-and-or-further-evaluated
	File	m4/42-stud-rep/423-tox/4235-repro-dev-tox/42354-juv/study-report-3.pdf
	Comment	
	Number	4.2.3.6
		Local Tolerance
233	Element	m4-2-3-6-local-tolerance
	Directory	m4/42-stud-rep/423-tox/4236-loc-tol
	Comment	
	Number	
	Title	Study Report 1
234	Element	m4-2-3-6-local-tolerance
	File	m4/42-stud-rep/423-tox/4236-loc-tol/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
235	Element	m4-2-3-6-local-tolerance
	File	m4/42-stud-rep/423-tox/4236-loc-tol/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
236	Element	m4-2-3-6-local-tolerance
	File	m4/42-stud-rep/423-tox/4236-loc-tol/study-report-3.pdf
	Comment	
	Number	4.2.3.7
	Title	Other Toxicity Studies (if available)
237		m4-2-3-7-other-toxicity-studies
	Directory	m4/42-stud-rep/423-tox/4237-other-tox-stud
	Comment	

	Number	4.2.3.7.1
	Title	Antigenicity
238	Element	m4-2-3-7-1-antigenicity
	Directory	m4/42-stud-rep/423-tox/4237-other-tox-stud/42371-antigen
	Comment	·
	Number	
	Title	Study Report 1
239	Element	m4-2-3-7-1-antigenicity
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42371-antigen/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
240	Element	m4-2-3-7-1-antigenicity
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42371-antigen/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
241		m4-2-3-7-1-antigenicity
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42371-antigen/study-report-3.pdf
	Comment	
	Number	4.2.3.7.2
	Title	Immunotoxicity
242	Element	m4-2-3-7-2-immunotoxicity
	Directory	m4/42-stud-rep/423-tox/4237-other-tox-stud/42372-immunotox
	Comment	
	Number	
	Title	Study Report 1
243	Element	m4-2-3-7-2-immunotoxicity
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42372-immunotox/study-report-1.pdf
	Comment	
244	Number	
	Title	Study Report 2
	Element	m4-2-3-7-2-immunotoxicity

	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42372-immunotox/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
245	Element	m4-2-3-7-2-immunotoxicity
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42372-immunotox/study-report-3.pdf
	Comment	
	Number	4.2.3.7.3
	Title	Mechanistic studies (if not included elsewhere)
246	Element	m4-2-3-7-3-mechanistic-studies
	Directory	m4/42-stud-rep/423-tox/4237-other-tox-stud/42373-mechan-stud
	Comment	
	Number	
	Title	Study Report 1
247	Element	m4-2-3-7-3-mechanistic-studies
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42373-mechan-stud/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
		m4-2-3-7-3-mechanistic-studies
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42373-mechan-stud/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
		m4-2-3-7-3-mechanistic-studies
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42373-mechan-stud/study-report-3.pdf
	Comment	
	Number	4.2.3.7.4
	Title	Dependence
250		m4-2-3-7-4-dependence
		m4/42-stud-rep/423-tox/4237-other-tox-stud/42374-dep
	Comment	
251	Number	

	Title	Study Report 1
	Element	m4-2-3-7-4-dependence
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42374-dep/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
252	Element	m4-2-3-7-4-dependence
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42374-dep/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
253	Element	m4-2-3-7-4-dependence
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42374-dep/study-report-3.pdf
	Comment	
	Number	4.2.3.7.5
	Title	Metabolites
254	Element	m4-2-3-7-5-metabolites
	Directory	m4/42-stud-rep/423-tox/4237-other-tox-stud/42375-metab
	Comment	
	Number	
	Title	Study Report 1
	Element	m4-2-3-7-5-metabolites
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42375-metab/study-report-1.pdf
	Comment	
	Number	
	Title	Study Report 2
256	Element	m4-2-3-7-5-metabolites
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42375-metab/study-report-2.pdf
	Comment	
257	Number	
	Title	Study Report 3
	Element	m4-2-3-7-5-metabolites
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42375-metab/study-report-3.pdf

	Comment	
	Number	4.2.3.7.6
258	Title	Impurities
	Element	m4-2-3-7-6-impurities
	Directory	m4/42-stud-rep/423-tox/4237-other-tox-stud/42376-imp
	Comment	
	Number	
	Title	Study Report 1
259		m4-2-3-7-6-impurities
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42376-imp/study-report-1.pdf
	Comment	
	Number	
		Study Report 2
260		m4-2-3-7-6-impurities
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42376-imp/study-report-2.pdf
	Comment	
	Number	
		Study Report 3
261		m4-2-3-7-6-impurities
		m4/42-stud-rep/423-tox/4237-other-tox-stud/42376-imp/study-report-3.pdf
	Comment	
		4.2.3.7.7
		Other
262		m4-2-3-7-other
		m4/42-stud-rep/423-tox/4237-other-tox-stud/42377-other
	Comment	
	Number	
	Title	Study Report 1
263	Element	m4-2-3-7-7-other
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42377-other/study-report-1.pdf
	Comment	
264	Number	
	Title	Study Report 2

	Element	m4-2-3-7-7-other
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42377-other/study-report-2.pdf
	Comment	
	Number	
	Title	Study Report 3
265	Element	m4-2-3-7-7-other
	File	m4/42-stud-rep/423-tox/4237-other-tox-stud/42377-other/study-report-3.pdf
	Comment	
	Number	4.3
	Title	Literature References
266	Element	m4-3-literature-references
	_	m4/43-lit-ref
	Comment	Copies of literature references should ordinarily be submitted as individual files (i.e., one for each reference).
	Number	
		Reference 1
		m4-3-literature-references
		m4/43-lit-ref/ <i>reference-1.pdf</i>
	Comment	
	Number	
		Reference 2
		m4-3-literature-references
		m4/43-lit-ref/ <i>reference-2.pdf</i>
	Comment	
	Number	
		Reference 3
		m4-3-literature-references
	File	m4/43-lit-ref/ <i>reference-3.pdf</i>
	Comment	

	Number	5
	Title	Clinical Study Reports
270	Element	m5-clinical-study-reports
270		m5
	Comment	
	Number	5.2
	Title	Tabular Listing of all Clinical Studies
271	Element	m5-2-tabular-listing-of-all-clinical-studies
	Directory	m5/52-tab-list
	Comment	
		5.2
	Title	Tabular Listing of all Clinical Studies
272	Element	m5-2-tabular-listing-of-all-clinical-studies
	File	m5/52-tab-list/tabular-listing.pdf
	Comment	
	Number	5.3
	Title	Clinical Study Reports
273	Element	m5-3-clinical-study-reports
	Directory	m5/53-clin-stud-rep
	Comment	
		5.3.1
		Reports of Biopharmaceutic Studies
274		m5-3-1-reports-of-biopharmaceutic-studies
		m5/53-clin-stud-rep/531-rep-biopharm-stud
	Comment	
		5.3.1.1
		Bioavailability (BA) Study Reports
275		m5-3-1-1-bioavailability-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5311-ba-stud-rep
	Comment	
276	Number	
	Title	Study Report 1

	Element	m5-3-1-1-bioavailability-study-reports
		m5/53-clin-stud-rep/531-rep-biopharm-stud/5311-ba-stud-rep/study-report-1
	Comment	This comment is applicable to all study reports in Module 5. The applicants should ordinarily provide the study reports as multiple files (a synopsis, a main body and appropriate appendices). Appendices should be organized in accordance with the ICH E3 guideline, which describes the content and format of the clinical study report. In choosing the level of granularity for reports the applicant should consider that, when relevant information is changed at any point in the product's life cycle, replacements of complete files should be provided. A directory should be created for each study and the files associated with the study report should be organized within the directory. Individual studies and files do not have specific CTD numbers.
	Number	
	Title	Study Report 2
	Element	m5-3-1-1-bioavailability-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5311-ba-stud-rep/study-report-2
	Comment	
	Number	
	Title	Study Report 3
278	Element	m5-3-1-1-bioavailability-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5311-ba-stud-rep/study-report-3
	Comment	
		5.3.1.2
	Title	Comparative BA and Bioequivalence (BE) Study Reports
279	Element	m5-3-1-2-comparative-ba-and-bioequivalence-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5312-compar-ba-be-stud-rep
	Comment	
	Number	
	Title	Study Report 1
280	Element	m5-3-1-2-comparative-ba-and-bioequivalence-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5312-compar-ba-be-stud-rep/study-report-1
	Comment	
281	Number	
1	Title	Study Report 2
	Element	m5-3-1-2-comparative-ba-and-bioequivalence-study-reports
1	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5312-compar-ba-be-stud-rep/study-report-2

	Comment	
	Number	
	Title	Study Report 3
		m5-3-1-2-comparative-ba-and-bioequivalence-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5312-compar-ba-be-stud-rep/study-report-3
	Comment	
	Number	5.3.1.3
	Title	In vitro – In vivo Correlation Study Reports
283	Element	m5-3-1-3-in-vitro-in-vivo-correlation-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5313-in-vitro-in-vivo-corr-stud-rep
	Comment	
	Number	
	Title	Study Report 1
284	Element	m5-3-1-3-in-vitro-in-vivo-correlation-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5313-in-vitro-in-vivo-corr-stud-rep/study-report-1
	Comment	
	Number	
	Title	Study Report 2
285	Element	m5-3-1-3-in-vitro-in-vivo-correlation-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5313-in-vitro-in-vivo-corr-stud-rep/study-report-2
	Comment	
	Number	
	Title	Study Report 3
286	Element	m5-3-1-3-in-vitro-in-vivo-correlation-study-reports
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5313-in-vitro-in-vivo-corr-stud-rep/study-report-3
	Comment	
		5.3.1.4
		Reports of Bioanalytical and Analytical Methods for Human Studies
		m5-3-1-4-reports-of-bioanalytical-and-analytical-methods-for-human-studies
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5314-bioanalyt-analyt-met
	Comment	
	Number	
	Title	Study Report 1

	Element	m5-3-1-4-reports-of-bioanalytical-and-analytical-methods-for-human-studies
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5314-bioanalyt-analyt-met/study-report-1
	Comment	
	Number	
	Title	Study Report 2
289	Element	m5-3-1-4-reports-of-bioanalytical-and-analytical-methods-for-human-studies
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5314-bioanalyt-analyt-met/study-report-2
	Comment	
	Number	
	Title	Study Report 3
290	Element	m5-3-1-4-reports-of-bioanalytical-and-analytical-methods-for-human-studies
	Directory	m5/53-clin-stud-rep/531-rep-biopharm-stud/5314-bioanalyt-analyt-met/study-report-3
	Comment	
	Number	5.3.2
	Title	Reports of Studies Pertinent to Pharmacokinetics using Human Biomaterials
291		m5-3-2-reports-of-studies-pertinent-to-pharmacokinetics-using-human-biomaterials
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat
	Comment	
	Number	5.3.2.1
	Title	Plasma Protein Binding Study Reports
292		m5-3-2-1-plasma-protein-binding-study-reports
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5321-plasma-prot-bind-stud-rep
	Comment	
	Number	
	Title	Study Report 1
293	Element	m5-3-2-1-plasma-protein-binding-study-reports
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5321-plasma-prot-bind-stud-rep/study-report-1
	Comment	
	Number	
	Title	Study Report 2
294		m5-3-2-1-plasma-protein-binding-study-reports
		m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5321-plasma-prot-bind-stud-rep/study-report-2
	Comment	

	Number	
	Title	Study Report 3
295	Element	m5-3-2-1-plasma-protein-binding-study-reports
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5321-plasma-prot-bind-stud-rep/study-report-3
	Comment	
	Number	5.3.2.2
	Title	Reports of Hepatic Metabolism and Drug Interaction Studies
296	Element	m5-3-2-2-reports-of-hepatic-metabolism-and-drug-interaction-studies
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5322-rep-hep-metab-interact-stud
	Comment	
	Number	
	Title	Study Report 1
297	Element	m5-3-2-2-reports-of-hepatic-metabolism-and-drug-interaction-studies
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5322-rep-hep-metab-interact-stud/study-report-1
_	Comment	
	Number	
	Title	Study Report 2
298	Element	m5-3-2-2-reports-of-hepatic-metabolism-and-drug-interaction-studies
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5322-rep-hep-metab-interact-stud/study-report-2
	Comment	
	Number	
	Title	Study Report 3
299	Element	m5-3-2-2-reports-of-hepatic-metabolism-and-drug-interaction-studies
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5322-rep-hep-metab-interact-stud/study-report-3
	Comment	
	Number	5.3.2.3
	Title	Reports of Studies Using Other Human Biomaterials
300	Element	m5-3-2-3-reports-of-studies-using-other-human-biomaterials
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5323-stud-other-human-biomat
	Comment	
	Number	
	Title	Study Report 1
	Element	m5-3-2-3-reports-of-studies-using-other-human-biomaterials

	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5323-stud-other-human-biomat/study-report-1
	Comment	
	Number	
	Title	Study Report 2
302	Element	m5-3-2-3-reports-of-studies-using-other-human-biomaterials
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5323-stud-other-human-biomat/study-report-2
	Comment	
	Number	
	Title	Study Report 3
303	Element	m5-3-2-3-reports-of-studies-using-other-human-biomaterials
	Directory	m5/53-clin-stud-rep/532-rep-stud-pk-human-biomat/5323-stud-other-human-biomat/study-report-3
	Comment	
	Number	5.3.3
	Title	Reports of Human Pharmacokinetic (PK) Studies
304	Element	m5-3-3-reports-of-human-pharmacokinetics-pk-studies
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud
	Comment	
	Number	5.3.3.1
	Title	Healthy Subject PK and Initial Tolerability Study Reports
305	Element	m5-3-3-1-healthy-subject-pk-and-initial-tolerability-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5331-healthy-subj-pk-init-tol-stud-rep
	Comment	
	Number	
	Title	Study Report 1
306	Element	m5-3-3-1-healthy-subject-pk-and-initial-tolerability-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5331-healthy-subj-pk-init-tol-stud-rep/study-report-1
	Comment	
	Number	
	Title	Study Report 2
307	Element	m5-3-3-1-healthy-subject-pk-and-initial-tolerability-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5331-healthy-subj-pk-init-tol-stud-rep/study-report-2
	Comment	
308	Number	

	Title	Study Report 3
	Element	m5-3-3-1-healthy-subject-pk-and-initial-tolerability-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5331-healthy-subj-pk-init-tol-stud-rep/study-report-3
	Comment	
	Number	5.3.3.2
	Title	Patient PK and Initial Tolerability Study Reports
309	Element	m5-3-3-2-patient-pk-and-initial-tolerability-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5332-patient-pk-init-tol-stud-rep
	Comment	
	Number	
	Title	Study Report 1
310	Element	m5-3-3-2-patient-pk-and-initial-tolerability-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5332-patient-pk-init-tol-stud-rep/study-report-1
	Comment	
	Number	
	Title	Study Report 2
311	Element	m5-3-3-2-patient-pk-and-initial-tolerability-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5332-patient-pk-init-tol-stud-rep/study-report-2
	Comment	
	Number	
	Title	Study Report 3
312	Element	m5-3-3-2-patient-pk-and-initial-tolerability-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5332-patient-pk-init-tol-stud-rep/study-report-3
	Comment	
	Number	5.3.3.3
	Title	Intrinsic Factor PK Study Reports
313	Element	m5-3-3-intrinsic-factor-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5333-intrin-factor-pk-stud-rep
	Comment	
314	Number	
	Title	Study Report 1
	Element	m5-3-3-intrinsic-factor-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5333-intrin-factor-pk-stud-rep/study-report-1

	Comment	
	Number	
	Title	Study Report 2
315	Element	m5-3-3-intrinsic-factor-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5333-intrin-factor-pk-stud-rep/study-report-2
	Comment	
	Number	
	Title	Study Report 3
316	Element	m5-3-3-intrinsic-factor-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5333-intrin-factor-pk-stud-rep/study-report-3
	Comment	
	Number	5.3.3.4
	Title	Extrinsic Factor PK Study Reports
317	Element	m5-3-3-4-extrinsic-factor-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5334-extrin-factor-pk-stud-rep
	Comment	
	Number	
	Title	Study Report 1
	Element	m5-3-3-4-extrinsic-factor-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5334-extrin-factor-pk-stud-rep/study-report-1
	Comment	
	Number	
	Title	Study Report 2
	Element	m5-3-3-4-extrinsic-factor-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5334-extrin-factor-pk-stud-rep/study-report-2
-	Comment	
	Number	
	Title	Study Report 3
	Element	m5-3-3-4-extrinsic-factor-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5334-extrin-factor-pk-stud-rep/study-report-3
	Comment	
321	Number	5.3.3.5
	Title	Population PK Study Reports

	Element	m5-3-3-5-population-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5335-popul-pk-stud-rep
	Comment	
	Number	
	Title	Study Report 1
322	Element	m5-3-3-5-population-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5335-popul-pk-stud-rep/study-report-1
	Comment	
	Number	
	Title	Study Report 2
323	Element	m5-3-3-5-population-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5335-popul-pk-stud-rep/study-report-2
	Comment	
	Number	
	Title	Study Report 3
324	Element	m5-3-3-5-population-pk-study-reports
	Directory	m5/53-clin-stud-rep/533-rep-human-pk-stud/5335-popul-pk-stud-rep/study-report-3
	Comment	
	Number	5.3.4
	Title	Reports of Human Pharmacodynamic (PD) Studies
325	Element	m5-3-4-reports-of-human-pharmacodynamics-pd-studies
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud
	Comment	
	Number	5.3.4.1
	Title	Healthy Subject PD and PK/PD Study Reports
326	Element	m5-3-4-1-healthy-subject-pd-and-pk-pd-study-reports
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud/5341-healthy-subj-pd-stud-rep
	Comment	
	Number	
	Title	Study Report 1
		m5-3-4-1-healthy-subject-pd-and-pk-pd-study-reports
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud/5341-healthy-subj-pd-stud-rep/study-report-1
	Comment	

	Number	
	Title	Study Report 2
328	Element	m5-3-4-1-healthy-subject-pd-and-pk-pd-study-reports
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud/5341-healthy-subj-pd-stud-rep/study-report-2
	Comment	
	Number	
	Title	Study Report 3
329	Element	m5-3-4-1-healthy-subject-pd-and-pk-pd-study-reports
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud/5341-healthy-subj-pd-stud-rep/study-report-3
	Comment	
	Number	5.3.4.2
	Title	Patient PD and PK/PD Study Reports
330	Element	m5-3-4-2-patient-pd-and-pk-pd-study-reports
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud/5342-patient-pd-stud-rep
	Comment	
	Number	
	Title	Study Report 1
331	Element	m5-3-4-2-patient-pd-and-pk-pd-study-reports
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud/5342-patient-pd-stud-rep/study-report-1
	Comment	
	Number	
	Title	Study Report 2
332	Element	m5-3-4-2-patient-pd-and-pk-pd-study-reports
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud/5342-patient-pd-stud-rep/study-report-2
	Comment	
	Number	
	Title	Study Report 3
	Element	m5-3-4-2-patient-pd-and-pk-pd-study-reports
	Directory	m5/53-clin-stud-rep/534-rep-human-pd-stud/5342-patient-pd-stud-rep/study-report-3
	Comment	
	Number	5.3.5
	Title	Reports of Efficacy and Safety Studies
	Element	m5-3-5-reports-of-efficacy-and-safety-studies

	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud
	Comment	
	Number	5.3.5
	Title	Reports of Efficacy and Safety Studies - Indication Name
	Element	m5-3-5-reports-of-efficacy-and-safety-studies
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1
335		The folder name should always include the indication being claimed, for example, 'asthma' (abbreviated if appropriate). Where there is more than one indication (e.g., asthma and migraine), then the first indication has a folder 'asthma' and the second 'migraine'.
	Comment	The 'indication' attribute in the backbone should be consistent with that used in the folder name but can be different. For example, an 'indication' attribute value of 'Non-Small Cell Lung Cancer' could be expressed as 'NSCLC' in the folder name. There is currently no standard terminology list for 'indication' and applicants should choose the 'indication' attributes carefully as they can not be easily changed during the life cycle of the application. The only way this can be accomplished currently is to delete all the leaf elements with the incorrect attribute value and provide new leaf elements for those files with the modified attribute value. Applicants should consult with the regional
		authority before attempting to modify these attributes to discuss the appropriateness of, and approach to be taken for, this type of change.
	Number	5.3.5.1
	Title	Study Reports of Controlled Clinical Studies Pertinent to the Claimed Indication
	Element	m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5351-stud-rep-contr
	Comment	
	Number	
	Title	Study Report 1
	Element	m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5351-stud-rep-contr/study-report-1
	Comment	
	Number	
	Title	Study Report 2
	Element	m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5351-stud-rep-contr/study-report-2
	Comment	
	Number	
	Title	Study Report 3
	Element	m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5351-stud-rep-contr/study-report-3

	Comment	
	Number	5.3.5.2
	Title	Study Reports of Uncontrolled Clinical Studies
	Element	m5-3-5-2-study-reports-of-uncontrolled-clinical-studies
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5352-stud-rep-uncontr
	Comment	
	Number	
	Title	Study Report 1
341	Element	m5-3-5-2-study-reports-of-uncontrolled-clinical-studies
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5352-stud-rep-uncontr/study-report-1
	Comment	
	Number	
	Title	Study Report 2
342		m5-3-5-2-study-reports-of-uncontrolled-clinical-studies
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5352-stud-rep-uncontr/study-report-2
	Comment	
	Number	
	Title	Study Report 3
343		m5-3-5-2-study-reports-of-uncontrolled-clinical-studies
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5352-stud-rep-uncontr/study-report-3
	Comment	
		5.3.5.3
		Reports of Analyses of Data from More than One Study
344	Element	m5-3-5-3-reports-of-analyses-of-data-from-more-than-one-study
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5353-rep-analys-data-more-one-stud
	Comment	
	Number	
	Title	Study Report 1
345	Element	m5-3-5-3-reports-of-analyses-of-data-from-more-than-one-study
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5353-rep-analys-data-more-one-stud/study-report-1
	Comment	
346	Number	
	Title	Study Report 2

	Element	m5-3-5-3-reports-of-analyses-of-data-from-more-than-one-study
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5353-rep-analys-data-more-one-stud/study-report-2
	Comment	
	Number	
	Title	Study Report 3
347	Element	m5-3-5-3-reports-of-analyses-of-data-from-more-than-one-study
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5353-rep-analys-data-more-one-stud/study-report-3
	Comment	
	Number	5.3.5.4
	Title	Other Study Reports
348	Element	m5-3-5-4-other-study-reports
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5354-other-stud-rep
	Comment	
	Number	
	Title	Study Report 1
349	Element	m5-3-5-4-other-study-reports
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5354-other-stud-rep/study-report-1
	Comment	
	Number	
	Title	Study Report 2
350	Element	m5-3-5-4-other-study-reports
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5354-other-stud-rep/study-report-2
	Comment	
	Number	
	Title	Study Report 3
351	Element	m5-3-5-4-other-study-reports
	Directory	m5/53-clin-stud-rep/535-rep-effic-safety-stud/indication-1/5354-other-stud-rep/study-report-3
	Comment	
	Number	5.3.6
	Title	Reports of Postmarketing Experience
352	Element	m5-3-6-reports-of-postmarketing-experience
	Directory	m5/53-clin-stud-rep/536-postmark-exp
	Comment	

	Number	5.3.7
	Title	Case Report Forms and Individual Patient Listings
353	Element	m5-3-7-case-report-forms-and-individual-patient-listings
	Directory	m5/53-clin-stud-rep/537-crf-ipl
	Comment	
	Number	
	Title	Study 1
354	Element	m5-3-7-case-report-forms-and-individual-patient-listings
	Directory	m5/53-clin-stud-rep/537-crf-ipl/study-1
	Comment	
	Number	
	Title	Document/Dataset 1
355	Element	m5-3-7-case-report-forms-and-individual-patient-listings
333	File	m5/53-clin-stud-rep/537-crf-ipl/study-1/filename-1.pdf
	Comment	The filename and extension should include the description of the file and appropriate file extension according to Appendix 2. Reference should be made to regional guidance for the acceptability of submission of datasets
	Number	
	Title	Document/Dataset 2
356	Element	m5-3-7-case-report-forms-and-individual-patient-listings
	File	m5/53-clin-stud-rep/537-crf-ipl/study-1/filename-2.pdf
	Comment	
	Number	
	Title	Document/Dataset 3
		m5-3-7-case-report-forms-and-individual-patient-listings
I	File	m5/53-clin-stud-rep/537-crf-ipl/study-1/filename-3.pdf
	Comment	
	Number	
	Title	Study 2
I		m5-3-7-case-report-forms-and-individual-patient-listings
		m5/53-clin-stud-rep/537-crf-ipl/study-2
		define element
	Number	
	Title	Document/Dataset 1

	Element	m5-3-7-case-report-forms-and-individual-patient-listings			
	File	m5/53-clin-stud-rep/537-crf-ipl/study-2/filename-1.pdf			
	Comment				
	Number				
	Title	Document/Dataset 2			
360	Element	m5-3-7-case-report-forms-and-individual-patient-listings			
	File	m5/53-clin-stud-rep/537-crf-ipl/study-2/filename-2.pdf			
	Comment				
	Number				
	Title	Document/Dataset 3			
361	Element	m5-3-7-case-report-forms-and-individual-patient-listings			
	File	m5/53-clin-stud-rep/537-crf-ipl/study-2/filename-3.pdf			
	Comment				
	Number				
	Title	Study 3			
362	Element	m5-3-7-case-report-forms-and-individual-patient-listings			
	Directory	m5/53-clin-stud-rep/537-crf-ipl/study-3			
	Comment	define element			
	Number				
	Title	Document/Dataset 1			
	Element	m5-3-7-case-report-forms-and-individual-patient-listings			
	File	m5/53-clin-stud-rep/537-crf-ipl/ <i>study-3/filename-1.pdf</i>			
	Comment				
	Number				
	Title	Document/Dataset 2			
364	Element	m5-3-7-case-report-forms-and-individual-patient-listings			
	File	m5/53-clin-stud-rep/537-crf-ipl/study-3/filename-2.pdf			
	Comment				
	Number				
	Title	Document/Dataset 3			
365	Element	m5-3-7-case-report-forms-and-individual-patient-listings			
	File	m5/53-clin-stud-rep/537-crf-ipl/study-3/filename-3.pdf			
	Comment				

	Number	5.4
	Title	Literature References
366	Element	m5-4-literature-references
	Directory	m5/54-lit-ref
	Comment	Copies of literature references should ordinarily be submitted as individual files (i.e,. one for each reference).
	Number	
	Title	Reference 1
367	Element	m5-4-literature-references
	File	m5/54-lit-ref/reference-1.pdf
	Comment	
	Number	
	Title	Reference 2
368	Element	m5-4-literature-references
	File	m5/54-lit-ref/ <i>reference-2.pdf</i>
	Comment	
	Number	
	Title	Reference 3
369	Element	m5-4-literature-references
	File	m5/54-lit-ref/ <i>reference-3.pdf</i>
	Comment	

	Number	
	Title	
370	Element	
	Directory	util
	Comment	utilities
	Number	
	Title	
	Element	
371	Directory	util/dtd
		DTDs/Schemas – it is not necessary to include regional DTDs/Schemas other than the one for the region to which the application is being
	Comment	made.
		File names in rows 372 - 379 are illustrative only. Please consult regional guidance for the current name and version of the files.
	Number	
	Title	
372	Element	
	File	util/dtd/ich-ectd-n.dtd
	Comment	DTD for the instance – the version used to create the eCTD submission must be included. "n" denotes the specific version (e.g., 3-2).
	Number	
	Title	
373	Element	
	File	util/dtd/eu-regional-n.dtd
	Comment	DTD for the EU specific documentation. "n" denotes the specific version (e.g., 1-1).
	Number	
	Title	
374	Element	
	File	util/dtd/jp-regional-n.xsd
_	Comment	Schema for the Japan specific documentation. "n" denotes the specific version (e.g., 1-0).
	Number	
	Title	
	Element	
	File	util/dtd/us-regional-n.dtd
	Comment	DTD for the US specific documentation. "n" denotes the specific version (e.g., 1-0).

	Number	
	Title	
	Element	
376	File	util/dtd/xx-regional-n.dtd
	Comment	DTD for the xx specific documentation, where xx is a two character country code from ISO-3166-1. "n" denotes the specific version (e.g., 1-0).
	Number	
	Title	
377	Element	
	Directory	util/style
	Comment	Directory for style sheets – ICH and regional stylesheets
	Number	
	Title	
378	Element	
376	File	util/style/ectd-n.xsl
	Comment	The specific version of the eCTD stylesheet used by the applicant as a reference during the creation of the submission should be included. "n" denotes the specific version (e.g., 1-0).
	Number	
	Title	
379	Element	
319	File	util/style/xx-regional-n.xsl
	Comment	Stylesheet for the xx specific documentation, where xx is a two character country code from ISO-3166-1. "n" denotes the specific version (e.g., 1-0).

Appendix 5: Region Specific Information Including Transmission and Receipt

Introduction

This section describes region specific information for content that is not explicitly included in the Common Technical Document and logistical details appropriate for the transmission and receipt of submissions using the electronic Common Technical Document.

Region Specific Information: Module 1

This module contains administrative information that is unique for each region. There will be local requirements for both the content and electronic component of module 1. The eCTD backbone was developed to enable the transfer of the regional information included in a regulatory dossier.

Regional guidance will provide the specific instructions on how to provide the administrative forms and detailed prescribing information. Please refer to this information and appendix 6 when preparing module 1. Module 1 includes all administrative documents (e.g., forms and certifications) and labeling, including the documents described in regional guidance.

Not all regionally specific documents are included in module 1. Technical reports required for a specific region should be placed in modules 2 to 5. These reports should be included in the module most appropriate for the content of the information provided.

Each region provides specific guidance on the format and content of the regional requirements of each module. Table 5-1 provides contact information for each region.

Table 5-1

Region	Internet Address	Electronic Mail Contact
European Union	http://www.emea.europa.eu	esubmission@emea.europa.eu
Food And Drug Administration,	www.fda.gov/cber	esubprep@fda.hhs.gov
USA	www.fda.gov/cder	esub@fda.hhs.gov
Ministry of Health, Labour and	http://www.mhlw.go.jp	ectd@pmda.go.jp
Welfare, Japan	http://www.pmda.go.jp	
Health Canada	http://www.hc-sc.gc.ca	ereview@hc-sc.gc.ca

Submission Addresses

Submissions should be sent directly to the appropriate regulatory authority. Information on how to send submissions to each regulatory authority can be found at the reference location in Table 5-2.

Table 5-2

Regulatory Authority	Reference location
EMEA, European Union	http://www.emea.europa.eu
or national agencies	http://www.hma.eu/
Ministry of Health, Labour and Welfare, Japan	http://www.mhlw.go.jp
	http://www.pmda.go.jp
Food and Drug Administration, United States of	http://www.fda.gov/
America	
Health Canada, Health Protection Branch, Canada	http://www.hc-sc.gc.ca

Media

Refer to regional guidance for appropriate media types.

Cover Letter

Applicants should provide a cover letter as a PDF file (e.g., cover.pdf). A paper cover letter should also be included with non-electronic portions of the submission (such as forms with signatures or seals, and certifications). The cover letter should include:

- A description of the submission including appropriate regulatory information.
- A listing of the sections of the submission filed as paper, electronic, or both paper and electronic.
- A description of the electronic submission including type and number of electronic media, approximate size of the submission, and if appropriate, characteristics concerning the media (e.g., format used for DLT tapes) based on regional guidance.
- A statement that the submission is virus free with a description of the software used to check the files for viruses.
- The regulatory and information technology points of contact for the submission.

Transport

Secure data exchange over the Internet is the recommended means for transporting submissions. However, until the regulatory authorities can develop secure electronic gateways, submissions should continue to be physically transported by courier or registered mail.

Security

An MD5 checksum should be included for each physical file in the eCTD. The checksum enables the recipient to verify the integrity of each of the content files in the submission. Each leaf of the XML eCTD instance contains the location and calculated checksum of each of the files.

A checksum of the XML eCTD instance should also be included. Applicants should name this checksum file index-md5.txt and include it as a file in the same directory as the XML eCTD instance. Applicants should print the contents of the index-md5.txt file and include the paper copy with the paper cover letter for the submission. A separate file containing the checksum of the regional index file is unnecessary as that file (and its MD5 checksum) is referenced by a leaf element in the index.xml file.

An applicant can provide the eCTD as an encrypted file in accordance with the ICH M2 Recommendation 4.1, if the regulatory body has implemented it. This solution enables the eCTD to be encrypted and transferred over the Internet (if Internet receipt is implemented regionally) or to be encrypted on one of the approved physical media standards. The purpose of encryption is to protect the privacy of the confidential information and to ensure it is only available to the authorized receiver. Encryption is always appropriate when the eCTD is sent via the Internet.

Encryption is not considered necessary if the information is sent using a physical media, although encryption is an option. The applicant should assume all liability for the media until it is delivered to the regulatory authority.

Applicants should not include any file level security settings or password protection for individual files in the eCTD. Applicants should allow printing, changes to the document, selecting text and graphics, and adding or changing notes and form fields. Internal security and access control processes in the regulatory authority should maintain the integrity of the submitted files.

Receipt

Upon arrival at the regulatory authority, the submission is archived according to local regulations. A readonly copy of the submission is then made available to the review community in the regulatory authority. This is typically done by placing the copy on a network server.

Acknowledgment

Each regulatory authority should acknowledge the receipt of the eCTD submission according to the policy and procedure of the individual regulatory authority. Applicants should use the address in Table 5-1 to find guidance regarding acknowledgments.

Appendix 6: The eCTD XML Submission

Background

Many factors have influenced the design of the eCTD. Factors that have had a significant impact on the design are listed below:

- The submissions should accommodate full regulatory dossiers, supplements, amendments, and variations.
- The submissions should be able to accommodate regional requirements that are represented in regional guidance documents, regulations, and statutes.
- The technology should be extensible so that as technology changes, the new electronic solutions
 can be accommodated.

The eCTD is designed around the concept of a backbone. The backbone is similar to a container that holds pointers (called leaf elements) to the files that are part of the submission. The backbone is based on an XML Document Type Definition (DTD). There is a close relationship between the documents defined in the CTD and the elements defined in the eCTD DTD. The leaf elements in the backbone will provide the navigation links to the various files and information that make up the submission.

The file that is produced based on the XML eCTD DTD is the eCTD XML instance or XML backbone. The XML backbone allows more than one leaf element to point to the same physical file. This should be done with caution since managing the life cycle of that file can be more difficult for the regulatory authority if there is more than one pointer to the file.

File Names and Directory Structure

Recipients of the eCTD should be able to directly navigate through the submission at the folder and file level (i.e., without benefit of a customized end user application.) The structure of the eCTD and instructions for how to create folder names facilitate this type of navigation.

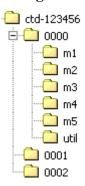
In order to preserve the navigational linkages that can be present in the documents contained in the eCTD, the directory structure will be preserved by the agencies. The navigational links should be relative links within a module.

Specific folder and file names have been defined in appendix 4. The top level of the directory structure will vary by region. The identification of the top-level folder uniquely identifies the application in a region. Consult regional guidance for specific requirements on top-level folder naming conventions. The original submission and subsequent amendments and variations should use the same top-level folder name. Submissions should be differentiated by a subfolder named according to the sequence number of the submission in that region. For all regions, sequence numbers should be unique within the overall application. For Japanese submissions, sequential numbering is required. For all other regions, it is preferred, but not required. Table 6-1 and Figure 6-1 illustrate this naming convention.

Table 6-1

Example top level folder name	Sequence number	Type of submission
ctd-123456	0000	Original Submission
ctd-123456	0001	First amendment, supplement or variation
ctd-123456	0002	Second amendment, supplement or variation
ctd-123456	Nnnn	Nth amendment, supplement or variation

Figure 6-1



You should submit the XML backbone as a single file named *index.xml*, which should be placed in the submission sequence number folder for that submission. In the example shown in Figure 6-1, there should be an *index.xml* file in folder "0000", folder "0001" and folder "0002". The MD5 checksum file, *index-md5.txt*, should be in each folder with the corresponding *index.xml* file. The DTD for *index.xml* should be in the "util" folder for each submission.

The regional administrative XML backbone file should be in the region specific module 1 folder for each submission. For each sequence, the operation attribute of the leaf element referencing this file is always 'new'. A separate file containing the checksum of the regional index file is unnecessary as that file (and its MD5 checksum) is referenced by the index.xml file. The DTD for the regional XML backbone file should be in the util folder for each submission.

Table 6-2 presents the file locations for the example in Figure 6-1.

Table 6-2

Submission Folder	Files
ctd-123456/0000	index.xml
	index-md5.txt
ctd-123456/0000/m1/us	us-regional.xml
ctd-123456/0000/util/dtd	ich-ectd-3-x.dtd
	us-regional-vx-x.dtd
ctd-123456/0001	index.xml
	index-md5.txt
ctd-123456/0001/m1/us	us-regional.xml
ctd-123456/0001/util/dtd	ich-ectd-3-x.dtd
	us-regional-vx-x.dtd
ctd-123456/0002	index.xml
	index-md5.txt
ctd-123456/0002/m1/us	us-regional.xml
ctd-123456/0002/util/dtd	ich-ectd-3-x.dtd
	us-regional-vx-x.dtd

Life Cycle Management

It is important for the recipients of an eCTD to be able to establish the location of the submission in the life cycle of a product.

The eCTD is capable of containing initial submissions, supplements, amendments, and variations. There are no uniform definitions for these terms in the three regions, but amendments and supplements are terms used in the United States. Variations apply in Europe. The variations, supplements, and amendments are used to provide additional information to an original regulatory dossier. For example, if a new manufacturer for the drug substance were being proposed, this would result in submission of an amendment or supplement to the FDA and a variation to Europe. When regulatory authorities request additional information, the information is also provided as a variation, supplement, or amendment to the original submission. Therefore, the regulatory agencies need a way to manage the life cycle of the submission. This function will be provided by each regulatory authority in the form of guidance that can include regional DTDs and specifications. The relevant regional DTD should be referenced in the eCTD DTD by the applicant.

The eCTD DTD provides some facilities for life cycle management at the leaf element level but does not fully support the life cycle at the submission level. When revisions are sent to a regulatory authority, the new leaf element should be submitted in the same location in the backbone as the leaf element being appended, replaced or deleted. The "modified-file" attribute of the leaf element should contain the leaf ID of the leaf being appended, replaced, or deleted. This will allow the regulatory authority to accurately locate the original leaf and update the original leaf's status. A detailed description of modified-file is provided in the next section.

Operation Attribute

The operation attribute is a key to managing each individual leaf element in a submission. The applicant uses the operation attribute to tell the regulatory authority how the applicant intends the leaf elements in the submission to be used. The operation attribute describes the relation between leaf elements in subsequent submissions during the life cycle of a medicinal product. In the very first submission all the leaf elements would typically be new. In the second, third, and subsequent submissions, all the newly submitted leaf elements can have different operation attributes due to having or not having a relation with previously submitted leaf elements. Table 6-3 describes the meaning of each allowed value of the operation attribute.

Table 6-3: Understanding the Operation Attribute

Operation attribute		What the reviewer might see when using the Agency review software	
value	Meaning	This leaf	Previous leaf
New	The leaf element has no relationship with leaf elements submitted previously. It is acceptable for multiple leaf elements in a single eCTD element to have the operation attribute of new, either in the same sequence or during the life cycle of the application.	Current	
Append	This means there is an existing leaf element to which this new leaf element should be associated. (e.g., providing missing or new information to that leaf element). It is recommended that append not be used to associate two leaf elements in the same submission (e.g., splitting a file due to size restrictions). However, use of append could be appropriate when leaf elements which normally would be submitted with the append relationship are provided in the same sequence (e.g., a document and its amendment). Consult with the regulatory authority before using append to associate two leaf elements in the same sequence.	Current	Current - Appended
Replace	This means there is an existing leaf element that this	Current	Replaced

Operation attribute		What the reviewer might see when using the Agency review software	
value	Meaning	This leaf	Previous leaf
	new leaf element replaces.		
Delete	There is no new file submitted in this case. Instead, the leaf element has the operation of "delete" and the "modified-file" attribute identifies the leaf element in a previous submission that is to be considered no longer relevant to the review. As there is no file being submitted, the checksum attribute value will be empty i.e., double quotation marks with no entry between ("").		No longer relevant to the review

The purpose of the modified-file attribute is to provide the location of a leaf element that is being modified (i.e. replaced, appended or deleted) by the subsequent leaf element. The modified-file attribute should have a value when the operation attribute has a value of *append*, *replace* or *delete*. The modified-file attribute points to the "index.xml" file and the leaf ID of the leaf element being altered. The modified-file attribute can only target a single leaf element. Furthermore, once a leaf element has been replaced or deleted by another leaf element, it is no longer current and can no longer be targeted by any subsequent leaf elements through the modified-file attribute.

An example of a modified-file attribute value is provided below:

modified-file="../0001/index.xml#a1234567"

This would provide the information needed to locate the file with the leaf element ID assigned as "a1234567" and provided in the sequence folder numbered "0001".

If a modified-file attribute is presented with no value (i.e. no characters or spaces between the quotation marks, modified-file="") it will be the same as not including the attribute in the leaf element.

The following case examples show the use of each of the operation attribute values. These examples do not cover all possible situations. Consult the appropriate regulatory authority if you have specific questions about the use of the operation attribute. When actually populating the XML instance, use the leaf ID to refer to files.

Case 1 – The first submission of a dossier.

Table 6-4

Submission sequence #	File name	Operation	File Being Modified	Sample logical display in a review tool
0000	0000\\structure.pdf	New		structure.pdf (current)

Case 2 – Two submissions. Submission 0000 is the first submission of a dossier. Submission 0001 is a subsequent amendment or variation in which the applicant intends to completely replace the structure.pdf file in submission 0000. The intent is to keep the original structure.pdf for historical purposes but to consider only the contents of the 0001\...\structure2.pdf as relevant to the review. These two submissions could be described as follows:

- Submission 0000 is the first submission of the file structure.pdf, and this file is the current version of this file.
- Submission 0001, which is submitted at a later time, is the submission of the file structure2.pdf, which is now current and replaces the file structure.pdf in submission 0000.

There is no requirement to preserve file names during life cycle changes; in fact, logical differences in file names can be helpful during review when both files are open simultaneously for comparative or other purposes.

Table 6-5

Submission	File name	Operation	File Being Modified	Sample logical display
sequence #				in a review tool
0000	0000\\structure.pdf	New		structure.pdf (current)
0001	0001\\structure2.pdf	Replace	0000\\structure.pdf	structure.pdf (replaced)
				structure2.pdf (current)

Case 3 – Two submissions. Submission 0000 is the first submission of a dossier. Submission 0001 is an amendment or variation where the applicant intends to add new information to the original structure.pdf file, which was submitted in submission 0000. The intent is to have the reviewer consider the contents of both files relevant to the submission. These two submissions could be described as follows:

- Submission 0000 is the first submission of the file structure.pdf, and this file is the current version of this file.
- Submission 0001, submitted at a later time, is the submission of the file structure2.pdf, which is the current file but contains information that should be appended to file structure.pdf in submission 0000. Both files should be considered relevant to the review of the dossier.

There is no requirement to preserve file names during life cycle changes; in fact, logical differences in file names can be helpful during review when both files are open simultaneously for comparative or other purposes.

Table 6-6

Submission	File name	Operation	File Being Modified	Sample logical display
sequence #				in a review tool
0000	0000\\structure.pdf	New		structure.pdf (current)
0001	0001\\structure2.pdf	Append	0000\\structure.pdf	structure.pdf (current - appended)
				structure2.pdf (current)

Case 4 – Two submissions. Submission 0000 is the first submission of a dossier. Submission 0001 is an amendment or variation where the applicant intends to delete a file in the previous submission. The intent is to have the reviewer disregard the contents of the original file, possibly because it should not have been submitted with the original dossier. These two submissions could be described as follows:

- Submission 0000 is the first submission of the file structure.pdf and this file is the current version of this file.
- Submission 0001, submitted at a later time, requests that the file structure.pdf in submission 0000 be deleted and no longer considered relevant to the review of the dossier.

Table 6-7

Submission	File name	Operation		Sample logical display in
sequence #			Modified	a review tool
0000	0000\\structure.pdf	New		structure.pdf (current)
0001		Delete	0000\\structure.pdf	structure.pdf (no longer
				relevant to the review)

File Reuse

It is important to the successful utilization of the eCTD to clearly understand the differences between a file and a leaf element. When reviewing an eCTD sequence, either through the stylesheet or an eCTD viewing tool, the presentation of the organization of the content files is based on the organization of the leaf elements in the index.xml files. The underlying file and folder structure is not critical to the view of the organization of the files referenced in the XML backbone. This aspect of the eCTD provides users the ability to provide a file once and display it in multiple locations of the eCTD by providing multiple leaf

elements referencing that file. Users of the eCTD Specification are encouraged to provide files once in a sequence and provide as many leaf elements referencing that file as necessary. The location of the file is not critical and should only be included once in an appropriate place in the folder structure. Suppliers of eCTD viewing tools are encouraged to develop a visual way of displaying when this occurs so reviewers can readily identify files which are referenced multiple times.

This capability can also be extended across sequences and even applications as long as the location of the file is accurately cited in the xlink:href attribute for the leaf element referencing that file. Suppliers of eCTD viewing tools are encouraged to develop a visual way of displaying the difference between a leaf element referring to a file in the current sequence and a leaf element referring to a file in a previous sequence. In these situations, validation checks for the presence of files referenced by the XML backbone should allow for the xlink:href to refer to files in other sequences and not prevent viewing of the eCTD by another applicant/regulator. Users of the eCTD Specification should consult with the regulatory authority before referencing content across sequences and/or applications.

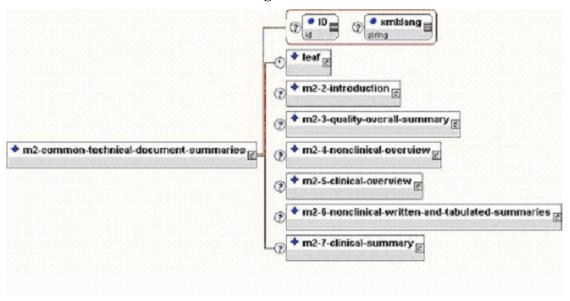
DTD Content Model

The content model of the eCTD is derived from the organization of the Common Technical Document. The graphic representation of a portion of the content model is shown below. The content model is hierarchical starting at the "ectd" and going down to a specific item to be included in the submission.

Figure 6-2

Figure 6-3 shows how the section of the CTD containing summaries is structured.

Figure 6-3



Once the appropriate element has been selected (e.g., Figure 6-4), you should use the <leaf> element and attributes (Figure 6-5) to specify a file in the submission. See "eCTD Element/Attribute Instructions" in this appendix for details.

Figure 6-4

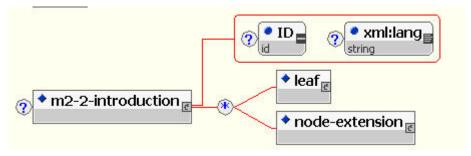
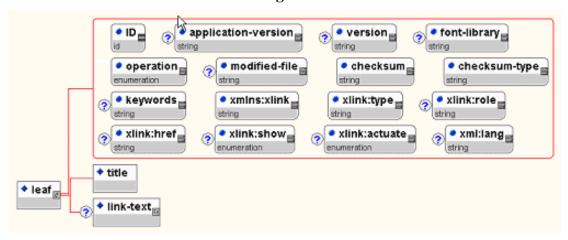


Figure 6-5



eCTD Element/Attribute Instructions

The eCTD consists of 5 primary modules:

- m1-administrative-information-and-prescribing-information
- m2-common-technical-document-summaries
- m3-quality
- m4-nonclinical-study-reports
- m5-clinical-study-reports

Each of the 5 modules is divided into one or more elements, each with a distinct element identifier that represents a CTD table of contents location. The steps should be completed as shown in the following example, where all files are submitted for modules 1 through 5:

- 1. Select an element that best corresponds to the CTD table of contents location for a document or file being submitted. For example, select the element <m2-7-3-summary-of-clinical-efficacy> to submit the summary of clinical efficacy document.
- 2. Specify any additional element attribute as appropriate; in this example, specify the 'indication' attribute to identify the subject of the efficacy summary in 2.7.3.
- $3. \quad \text{Create a child < leaf> element within the < m2-7-3-summary-of-clinical-efficacy> element.} \\$
- 4. Provide the relative location and file name of the actual file in the "xlink:href" attribute for the leaf element.
- 5. Provide a descriptive and concise title for the file in the <title> element of the leaf element.
- 6. Provide information for the appropriate attributes of the leaf element as described in Table 6-8.

Table 6-8 describes each of these elements and attributes in further detail.

Table 6-8

Element	Attribute	Description/Instructions	Example
Any table of		A table of contents element	
contents		represents a grouping of one or more	
element such		files related to a specific section of	
as <m2-4-< td=""><td></td><td>the Common Technical Document. A</td><td></td></m2-4-<>		the Common Technical Document. A	
nonclinical-		number of TOC elements can be	
overview>		further defined by the use of	
		attributes. The eCTD DTD defines	
		the following attributes at various	
		places in the eCTD: substance,	
		manufacturer, product-name,	
		indication, excipient, dosage-form	
		(e.g., 2.3.S and 3.2.S have two 'free	
		text' attributes: substance and	
		manufacturer; 5.3.5 has the	
		additional 'free text' attribute,	
		indication). To be consistent with the	
		CTD General Q&A, values for these	
		attributes should be included where	
		specified as is appropriate. There is	
		currently no standard terminology list	
		for any of these attributes and	
		applicants should carefully choose	
		the text of these attributes as they can	
		not be easily changed during the life	
		cycle of the application.	
		One or more child <leaf> elements</leaf>	
		can be declared for a parent table of	
		contents element.	
		It is possible to extend a table of	
		contents element by providing a	
		<node-extension> element. Node</node-extension>	
		extensions should only be added at	
		the lowest level of the defined table	
		of contents elements. Using node	
		extensions is discouraged and should	
		be done only when unavoidable.	
		Please refer to regional guidance	
		before using node extensions. See	
		the section "Instructions for	
		extending XML eCTD DTD	
		elements" in this appendix (Example	
		6-5).	
	ID	A unique identifier for this location	id403 (note: At this level, ID is optional)
	متا	in the XML instance.	id-05 (note. At this level, 1D is optional)
	umliles s		an an
	xml:lang	The primary language used by the files in this entire section of the	en
		submission. Use ISO-639 standard	
1		language abbreviations	

Element	Attribute	Description/Instructions	Example
<leaf></leaf>		A leaf element is a reference to a file.	
		One or more leaf elements can be	
		declared for a table of contents	
		element.	
	application-	This is the version of the file format	PDF 1.4
	version	produced by the software application	F D1 1.4
	VCISIOII	that was used to create this file.	
		that was used to create this me.	
	font-library	Reserved for Future Use	
	ID	The ID attribute is intended to be a	id050520
		unique reference within the	NOTE: See the XML-ID
		submission that can be used to	recommendations on the W3C website for
		reference the item from another item	info on the composition of this attribute
		within the XML document. An	value (http://www.w3.org/TR/xml-
		XML ID value begins with an	id/#processing)
		alphabetic character or underscore.	
		If an applicant is using an internal ID	
		generator that uses only numbers,	
		appending this generated number to a	
		leading alphabetic character or	
		underscore will create a valid ID	
		value.	
	checksum	The checksum value for the file	e854d3002c02a61fe5cbe926fd97b001
		being submitted.	
	checksum- type	The checksum algorithm used.	MD5
	modified-	The purpose of the modified-file	/0001/index.xml#a1234567
	file	attribute is to provide the location of	
		the leaf that is being modified (i.e.	
		replaced, appended or deleted) by the	
		leaf element. The modified-file	
		attribute should have a value when	
		the operation attribute has a value of	
		append, replace or delete. The	
		modified-file attribute points to the	
		"index.xml" file and the leaf ID of	
		the leaf being altered.	
	operation	Indicates the action to be performed.	new
	1	You should select one of the	
		following valid values:	
		• new	
		• replace	
1		• append	
		• delete	
		See the section Operation Attribute	
1		in this appendix for details on the	
		meaning of these values.	V22.5
	version	The file submitter's internal version	V23.5
		number or version identification for	
	vlinkeestusts	the file. Reserved for Future Use	
I	xiiiik:actuate	Reserved for ruture Use	

Element	Attribute	Description/Instructions	Example
	xlink:href	Provides the reference to the actual content file. You should use the	0000/m2/27-clin-sum/literature- references.pdf
		relative path to the file and the file	
		name. The content file does not need to be in the same sequence as the leaf	
		element that refers to it.	
	xlink:role	Reserved for Future Use	
	xlink:show	Reserved for Future Use	
	xlink:type	Fixed value of "simple"	simple
	keywords	Reserved for Future Use	
<title></td><td></td><td>As part of the leaf element, this</td><td>Study Report 1234</td></tr><tr><td></td><td></td><td>element contains a practical name for</td><td></td></tr><tr><td></td><td></td><td>the file being referenced by the leaf.</td><td>1024 bytes (512 characters) are proposed as the maximum length</td></tr><tr><td></td><td>ID</td><td>Unique identifier for this location in</td><td>a1234567</td></tr><tr><td></td><td></td><td>the XML instance. Leaf ID starts</td><td>NOTE 1: See the XML-ID</td></tr><tr><td></td><td></td><td>with an alphabetic character or</td><td>recommendations on the W3C website for</td></tr><tr><td></td><td></td><td>underscore.</td><td>info on the composition of this attribute</td></tr><tr><td></td><td></td><td></td><td>value (http://www.w3.org/TR/xml-</td></tr><tr><td></td><td></td><td></td><td>id/#processing) NOTE 2: At this level, ID is optional</td></tr><tr><td>link-text></td><td></td><td>Reserved for Future Use</td><td></td></tr><tr><td><xref></td><td></td><td>Reserved for Future Use</td><td></td></tr></tbody></table></title>			

Example 6-1: Instructions for a Simple New Submission⁷

The following XML fragment demonstrates the submission of a clinical overview of efficacy as a single PDF document.

This submission includes the file "clinical-overview.pdf" in the relative directory "m2/25-clin-over/" (i.e. the one starting below the dossier number directory). The file is "new" and has a descriptive name of "Clinical Overview"

The regional review application should treat this as a new submission to be associated with the submission identified in CTD module 1, which is region specific.

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⁷ Note that these XML examples are examples only and do not necessarily contain all of the elements and attributes that you should use when preparing an eCTD submission.

If this is the first submission for Dossier CTD 123456, all the files in this submission would typically be in the ctd-123456\0000 directory and below.

Example 6-2: Instructions for an Amendment, Supplement, or Variation

In the previous example, a clinical overview was submitted. In this example, it is replaced by an updated version.

To replace a file, add the replacement <leaf> element under the same element as the original file. If this is the second submission for Dossier CTD 123456, all the files in this submission would typically be in the ctd-123456\0001 directory and below.

Example 6-3: Instructions for Multiple Indications

Multiple therapeutic indications use an additional attribute associated with the <m2-7-3-summary-of-clinical-efficacy> and the <m5-3-5-reports-of-efficacy-and-safety-studies> elements to allow multiple indications to be submitted. There is currently no standard terminology list for 'indication'. Applicants should choose these attributes carefully as they can not be easily changed during the life cycle of the application. The only way this can be accomplished currently is to delete all the leaf elements with the incorrect attribute value and provide new leaf elements for those files with the modified attribute value. Applicants should consult with the regional authority before attempting to modify these attributes to discuss the appropriateness of, and approach to be taken for, this type of change. The following table shows the use of these attributes.

-			_	_
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Element	Attribute	Description/Instructions	Example
<m2-7-3-summary-of-clinical-efficacy></m2-7-3-summary-of-clinical-efficacy>	indication	Name of the indication	Pain
<m5-3-5-reports-of-efficacy-and-safety- studies></m5-3-5-reports-of-efficacy-and-safety- 	indication	Name of the indication.	Pain

Note that the indication attribute is used by the regulatory authority to apply to all the table of contents elements beneath the <m2-7-3-summary-of-clinical-efficacy> and <m5-3-5-reports-of-efficacy-and-safety-studies> elements. The following example expands on the instance showing the submission of information about two indications (pain and nausea).

```
<?xml version = "1.0" encoding = "UTF-8"?>
<!DOCTYPE ectd:ectd SYSTEM "util/dtd/ich-ectd-3-x.dtd">
<?xml-stylesheet type="text/xsl" href="util/style/ectd-2-1-x.xsl"?>
```

```
<ectd:ectd xmlns:ectd = "http://www.ich.org/ectd" xmlns:xlink = "http://www.w3c.org/1999/xlink">
    <m2-common-technical-document-summaries>
         <m2-7-clinical-summary>
         <m2-7-3-summary-of-clinical-efficacy indication = "pain">
              <leaf ID="s123456"operation = "new" xlink:type = "simple" checksum-type="md5" checksum =</pre>
              "5aa5c0e630a700af869e4c72535fc922" xlink:href = "m2/27-clin-sum/summary-clin-efficacy-
              pain.pdf">
                   <title>pain efficacy summary</title>
              </leaf>
         </m2-7-3-summary-of-clinical-efficacy>
         <m2-7-3-summary-of-clinical-efficacy indication = "nausea">
              <leaf ID="a123457" operation = "new" xlink:type = "simple" checksum-type="md5" checksum =</pre>
              "bde4d34dc80678a266352daf450c3962" xlink:href = "m2/27-clin-summ/summary-clin-efficacy-
              nausea.pdf">
                   <title>nausea efficacy summary</title>
         </m2-7-3-summary-of-clinical-efficacy>
         </m2-7-clinical-summary>
    </m2-common-technical-document-summaries>
    <m5-clinical-study-reports>
         <m5-3-clinical-study-reports>
         <m5-3-5-reports-of-efficacy-and-safety-studies indication = "pain">
              <m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication>
                   <leaf ID="a123458" operation = "new" xlink:type = "simple" checksum-type="md5" checksum =</pre>
                        "a4529c4a257f07f8a0ec591dde854578" xlink:href = "m5/53-clin-stud-rep/535-rep-eff-safety-
                       stud/pain/pain-sr1.pdf">
                        <title>pain study report 1</title>
                   </leaf>
              </m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication>
         </m5-3-5-reports-of-efficacy-and-safety-studies>
         <m5-3-5-reports-of-efficacy-and-safety-studies indication = "nausea">
              <m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication>
                   <leaf ID="a123459" operation = "new" xlink:type = "simple" checksum-type="md5" checksum =
                        "c5c39f594b2070a57bea66e58860efcf" xlink:href = "m5/53-clin-stud-rep/535-rep-eff-safety-
                       stud/nausea/nausea-sr15.pdf" >
                       <title>nausea study report 15</title>
                   </leaf>
                   <leaf ID = "a123460" operation = "new" xlink:type = "simple" checksum-type = "md5" checksum</li>
                       = "15faf198015f3599acabb7755c2d6b0c" xlink:href = "m5/53-clin-stud-rep/535-rep-eff-
                       safety-stud/nausea/5351-stud-rep-contr/xyz0015/nausea-sr15.pdf">
                            <title>nausea study report 15</title>
                   </leaf>
              </m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication>
         </m5-3-5-reports-of-efficacy-and-safety-studies>
         </m5-3-clinical-study-reports>
    </m5-clinical-study-reports>
</ectd:ectd>
```

Example 6-4: Instructions for Multiple Drug Substances, Manufacturers, and Products

Multiple drug substances use additional attributes associated with the <m3-2-s-drug-substance> element to allow unique combinations of the drug substance name and manufacturer to be submitted. There are currently no standard terminology lists for these attributes. Applicants should choose these attributes carefully as they can not be easily changed during the life cycle of the application. The only way this can be accomplished currently is to delete all the leaf elements with the incorrect attribute value and provide new leaf elements for those files with the modified attribute value. Applicants should consult with the regional authority before attempting to modify these attributes to discuss the appropriateness of, and approach to be taken for, this type of change. The following table shows the use of these attributes in 3.2.S.

Table 6-10

Element	Attribute	Description/Instructions	Example
<m3-2-s-drug-substance> substance</m3-2-s-drug-substance>		Name of one of the drug substances	Acetaminophen
	manufacturer	Name of the manufacturer of the drug substance	My Supplier

Example 6-4A:

This is an example of a section of the instance showing the submission of information about two drug substances (acetominophen and codeine), one of which is supplied by two manufacturers:

```
<m3-2-body-of-data>
         <m3-2-s-drug-substance substance = "Acetaminophen" manufacturer = "My Supplier">
                  <leaf ID="a123456" operation = "new" xlink:type = "simple" checksum-type="md5" checksum =</pre>
                  "b002e4544c02361fe54be926ae777012" xlink:href = "m3/32-body-data/32s-drug-
                  sub/acetaminophen-my-supplier/acetaminophen.pdf">
                            <title>Acetaminophen - My Supplier Data</title>
                  </leaf>
         </m3-2-s-drug-substance>
         <m3-2-s-drug-substance substance = "Acetaminophen" manufacturer = "Bulk Company 2">
                  <leaf ID="a123457" operation = "new" xlink:type = "simple" checksum-type="md5" checksum =</pre>
                  "0000cdfa05b1e995f88057150414a783" xlink:href = "m3/32-body-data/32s-drug-
                  sub/acetaminophen-bulk-company-2/acetaminophen2.pdf">
                            <title>Acetaminophen - bulk company 2 data</title>
                  </leaf>
         </m3-2-s-drug-substance>
         <m3-2-s-drug-substance substance = "Codeine" manufacturer = "Drug company 2">
                  <leaf ID="a123458" operation = "new" xlink:type = "simple" checksum-type="md5" checksum =</pre>
                  "f555a3234f65623fe54be926ee435354" xlink:href = "m3/32-body-data/32s-drug-sub/codeine-
                  drug-company-2/codeine-quality-data.pdf">
                            <title>codeine - drug company 2 data</title>
                  </leaf>
         </m3-2-s-drug-substance>
</m3-2-body-of-data>
```

Multiple drug products use additional attributes associated with the <m3-2-p-drug-product> element to allow unique combinations of the drug product name and dosage form to be submitted. Applicants should choose these attributes carefully as they can not be easily changed during the life cycle of the application. The only way this can be accomplished currently is to delete all the leaf elements with the incorrect attribute value and provide new leaf elements for those files with the modified attribute value. Applicants should consult with the regional authority before attempting to modify these attributes to discuss the appropriateness of, and approach to be taken for, this type of change. The following table shows the use of these attributes in 3.2.P.

Table 6-11

Element	Attribute	Description/Instructions	Example
<m3-2-p-drug-product></m3-2-p-drug-product>	product-name	Name of one of the drug products	Wonder drug
	dosageform	Dosage form	Capsule
	manufacturer	Manufacturer of the drug product	Company A

Example 6-4B

This is an example of a section of the instance showing the submission of information about two drug products (a capsule and a tablet):

Example 6-5: Instructions for Extending XML eCTD DTD Elements

An applicant can extend the definition of an element by creating node extensions beneath a defined table of contents element. Using node extensions is discouraged and should be done only when unavoidable. Please refer to regional guidance before using node extensions. The child element <node-extension> should be used for each new table of contents node created. The <title> element value is inherited from the parent element. You should only extend the lowest level of defined elements. For example you can extend the <m2-3-r-regional-information> element but not the <m2-3-quality-overall-summary> element since the latter is not the lowest element defined in the table of contents.

The following is an example of a section of an eCTD instance in which the applicant extends the <m2-3-r-regional-information> to provide specific regional information as requested by a regulatory authority. The title element associated with the <node-extension> describes the extension. Alternatively, the regional information in this example could have been provided as a <leaf> element under the <m2-3-r-regional-information> element without the use of a "node extension".

To update a file that has been submitted as an extended node, you should submit the replacement file using exactly the same element and "node extension" information, including the <title> element for the <node-extension>. This makes it possible for the regulatory authority to locate the original file and update its status.

Example 6-6: Instructions for Submitting Sections as Paper

During the transition to fully electronic submissions of the CTD, some regions will accept that some sections can be submitted as paper only. Please refer to regional guidance. These sections should be identified in the XML eCTD instance by including a PDF file in the instance that describes the content and location of the paper section. For example, the PDF file might consist of only one page with the name of the CTD document and the physical volume number and tab identifier. The <title> element in the XML eCTD instance could indicate that this is a paper submission.

This is an example of the instance showing the submission of a paper efficacy overview document.

Appendix 7: Specification for Submission Formats

Introduction

This appendix describes the way files should be constructed for inclusion in the eCTD. This section includes file formats that are commonly used in electronic submissions. Other formats can be used according to guidance published in each region.

PDF

Adobe Portable Document Format (PDF) is a published format created by Adobe Systems Incorporated (http://www.adobe.com). It is not necessary to use a product from Adobe or from any specific company to produce PDF documents. PDF is accepted as a standard for documents defined in this specification. The following recommendations support the creation of PDF files that agencies can review effectively. For any specification of the Japanese version of Adobe Acrobat, or where Japanese characters will be in the file, please refer to the regional guidance.

To ensure that PDF files can be accessed efficiently, PDF files should be no larger than 100 megabytes. Optimize PDF files for fast web view.

Version

All ICH Regional Health Authorities are able to read and have agreed to accept PDF files saved as PDF version 1.4. Agencies should not need any additional software to read and navigate the PDF files. PDF/A-1 (an ISO standard - ISO 19005-1:2005) is an archive format and does not meet the ICH review needs for use with an eCTD. Please consult regional guidance to submit other versions of PDF.

Fonts

PDF viewing software automatically substitutes a font to display text if the font used to create the text is unavailable on the reviewer's computer. Font substitution can affect a document's appearance and structure, and, in some cases, the information conveyed by a document. Agencies cannot guarantee the availability of any fonts except Times New Roman, Arial, and Courier and fonts supported in the Acrobat product set itself. Therefore, all additional fonts used in the PDF files should be embedded to ensure that those fonts would always be available to the reviewer. When embedding fonts, all characters for the font should be embedded, not just a subset of the fonts being used in the document

Embedding fonts requires additional computer storage space. Three techniques to help limit the storage space taken by embedding fonts include:

- Limiting the number of fonts used in each document
- Using only True Type or Adobe Type 1 fonts
- Avoiding customized fonts

Japanese fonts (2-byte fonts) are larger than Roman fonts (1-byte fonts), therefore, the specification allows a subset to be embedded for all Japanese fonts. The purpose of embedding fonts to is to enable the receiver of the document to use a personal computer to display and print the document correctly without having the same fonts installed in the computer. Therefore, it is not necessary to embed all Japanese fonts. Embedding a subset of Japanese fonts should work satisfactorily.

Definition of Subset

A subset means to embed only those characters used in the document. Embedding a full-set means all characters that comprise the font are embedded, even characters that are not used in the document. All two-byte fonts such as Japanese should be embedded as a sub-set.

Notes on Embedding Japanese Fonts:

The following should be considered when embedding fonts:

Advantages:

- Embedding fonts allows the PDF file to be correctly displayed and printed on any receiving PC environment.
- The computer does not need the original fonts installed.

Disadvantages:

- The file size increases when fonts are embedded.
- When document contains many pages, this can make the document slower to print.
- Many eCTD documents contain a large number of pages. Printing time in such cases becomes a concern.
- When using Japanese fonts, rules of operation should be established between the sender and receiver. (See regional guidance)
- The use of popular fonts only would allow the sender and receiver to view and print the document correctly without embedding fonts.

Font Size

Resizing a document because the contents are too small to read is inefficient. Times New Roman, 12-point font, the font used for this document, is adequate in size for narrative text and should be used whenever possible. It is sometimes tempting to use fonts which are smaller than 12 point in tables and charts but this should be avoided whenever possible. When choosing a font size for tables, a balance should be sought between providing sufficient information on a single page to facilitate data comparisons for the reviewer while maintaining a font size that remains legible. The corollary of this is that in using larger font size, more tables might be necessary, which can complicate data comparisons since data might now be included in separate tables. Generally, Times New Roman font sizes 9-10 or an equivalent size of other recommended fonts are considered acceptable in tables but smaller font sizes should be avoided.

Use of Color Fonts

The use of a black font color is recommended. Blue can be used for hypertext links. Light colors that do not print well on grayscale printers should be avoided. Color reproduction can be tested prior to submission by printing sample pages from the document using a gray scale printer. The use of background shadowing should be avoided.

Page Orientation

Pages should be properly oriented so that all portrait pages are presented in portrait and all landscape pages are presented in landscape. To achieve this, the page orientation of landscape pages should be set to landscape prior to saving the PDF document in final form.

Page Size and Margins

The print area for pages should fit on a sheet of A4 (210 x 297 mm) and Letter (8.5" x 11") paper. A sufficient margin (at least 2.5 cm) on the left side of each page should be provided to avoid obscuring information if the reviewer subsequently prints and binds the pages for temporary use. For pages in landscape orientation (typically tables and publications), smaller margins (at least 2.0 cm at the top and 0.8 cm left and right) allow more information to be displayed legibly on the page (see Fonts). Header and footer information can appear within these margins but should not appear so close to the page edge to risk being lost upon printing.

Headers and Footers

The M4 Granularity document specifies that all pages of a document should include a unique header or footer that briefly identifies its subject matter. With the eCTD there is a significant amount of metadata

available to the reviewer to allow easy identification of the document but it is still appropriate to have a unique identifier on each page (header or footer) of the document (e.g., when the document is printed or multiple documents are viewed on screen at the same time). The unique identifier does not necessarily have to contain the CTD section identifier or other metadata. It should be sufficient to identify the general subject matter of the document (e.g., study identifier, batch number).

Source of Electronic Document

PDF documents produced by scanning paper documents are usually inferior to those produced from an electronic source document. Scanned documents saved as image files are more difficult to read and do not allow reviewers to search or copy and paste text for editing. Scanning should be avoided where possible.

Methods for Creating PDF Documents and Images

The method used for creating PDF documents should produce the best replication of a paper document. To ensure that the paper and PDF version of the document are the same, the document should be printed from the PDF version. Documents that are available only in paper should be scanned at resolutions that will ensure the pages are legible both on the computer screen and when printed. At the same time, the file size should be limited. It is recommended that scanning be undertaken at a resolution of 300 dots per inch (dpi) to balance legibility and file size. The use of grayscale or color is discouraged because of file size. After scanning, resampling to a lower resolution should be avoided.

When creating PDF files containing images, the images should not be downsampled. Downsampling does not preserve all of the pixels in the original. For PDF images, one of the following lossless compression techniques should be used:

- For lossless compression of color and grayscale images, use Zip/Flate (one technique with two names). This is specified in Internet RFC 1950 and RFC 1951 (http://www.ietf.org/rfc/rfc1950.txt).
- For lossless compression of black and white images, use the CCITT Group 4 Fax compression technique. It is specified as CCITT recommendations T.6 (1988) Facsimile coding schemes and coding control functions for Group 4 facsimile apparatus.

Paper documents containing hand-written notes should be scanned at a resolution of at least 300 dpi. Hand-written notes should be done in black ink for clarity. Higher resolution is specifically requested when scanning documents containing non-Western characters (e.g. Kanji); 600 dpi is recommended.

For photographs, the image should be obtained with a resolution of 600 dpi. If black and white photos are submitted, 8-bit grayscale images should be considered. If color photos are submitted, 24-bit RGB images should be considered. A captured image should not be subjected to non-uniform scaling (i.e., sizing).

Gels and karyotypes should be scanned directly, rather than from photographs. Scanning should be at 600 dpi and 8-bit grayscale depth.

Plotter output graphics should be scanned or captured digitally at 300 dpi.

High-pressure liquid chromatography or similar images should be scanned at 300 dpi. Applicants should validate the quality of the renditions.

Hypertext Linking and Bookmarks

Hypertext links and bookmarks improve navigation through PDF documents. Hypertext links can be designated by rectangles using thin lines or by blue text as appropriate.

In general, for documents with a table of contents, bookmarks for each item listed in the table of contents should be provided including all tables, figures, publications, other references, and appendices. Bookmarks should follow hierarchical level and order of table of contents. These bookmarks are essential for the efficient navigation through documents. The bookmark hierarchy should be identical to the table of contents with no additional bookmark levels beyond those present in the table of contents. Each additional

level increases the need for space to read the bookmarks. The use of no more than 4 levels in the hierarchy is recommended.

Hypertext links throughout the document to support annotations, related sections, references, appendices, tables, or figures that are not located on the same page are helpful and improve navigation efficiency. Relative paths should be used when creating hypertext links to minimize the loss of hyperlink functionality when folders are moved between disk drives. Absolute links that reference specific drives and root directories will no longer work once the submission is loaded onto the Agency's network servers.

When creating bookmarks and hyperlinks, the magnification setting *Inherit Zoom* should be used so that the destination page displays at the same magnification level that the reviewer is using for the rest of the document.

Insufficient experience is available across agencies to provide any formal guidance on whether bookmarks should be presented expanded or collapsed. It might not be considered appropriate to have all the bookmarks open since, in some instances, these can be so numerous that they are not useful to the review and can affect 'refresh' time in a web-browser. Equally, it is probably not useful to have the bookmarks fully closed, since the reviewer would always have to open them. It is recommended, therefore, that the applicant consider the usefulness to the reviewers of how to present bookmarks and have some level of consistency across similar document types within the submission.

Page Numbering

Only the internal page numbers of the document are expected (1-n). No additional page/volume numbers running across documents are expected. It is easier to navigate through an electronic document if the page numbers for the document and the PDF file are the same. To accomplish this, the first page of the document should be numbered page 1, and all subsequent pages (including appendices and attachments) should be numbered consecutively with Arabic numerals. Roman numerals should not be used to number pages (e.g., title pages, tables of contents) and pages should not be left unnumbered (e.g., title page.) Numbering in this manner keeps the Acrobat numbering in synchrony with the internal document page numbers.

The only exception should be where a document is split because of its size (e.g., >100 MB); the second or subsequent file should be numbered consecutively to that of the first or preceding file.

Document Information Fields

Recommendations for the document information fields will be provided in the regional guidance for the specific submission type.

Open Dialog Box

The open dialog box sets the document view when the file is opened. The initial view of the PDF files should be set as *Bookmarks* and *Page*. If there are no bookmarks, the initial view as *Page* only should be set. The *Magnification* and *Page Layout* should be set as default.

Security

No security settings or password protection for PDF files should be included. Security fields should be set to allow printing, changes to the document, selecting text and graphics, and adding or changing notes and form fields.

Indexing PDF Documents

There are no current plans in the ICH regions to use full text indexes.

Use of Acrobat Plug-Ins

It is appropriate to use plug-ins to assist in the creation of a submission. However, the review of the submission should not call for the use of any plug-ins in addition to those provided with Adobe Acrobat because agencies will not necessarily have access to the additional plug-in functionality.

XML Files

A working group at the World Wide Web Consortium (W3C) developed XML. It is a nonproprietary language developed to improve on previous markup languages including standard generalized markup language (SGML) and hypertext markup language (HTML).

Information in an XML file is divided into specific pieces. These pieces are called objects or element types. The element type identifies the piece of information. For example, the name of the company submitting a registration application in eCTD format for review is identified with the element type <applicant>. All element type names are bracketed using the special characters <>. Inside the XML document, the element type name is placed just prior to the piece of information and after the information. This is called tagging. So, in the XML file, the applicant could be tagged as follows: <applicant>Worldwide Pharmaceuticals Inc.</applicant>. The "/" prior to the element type denotes that this is the end of the information about the applicant.

It is recognized that there is a general trend towards describing the contents of documents with XML. However, the current specification supports only the use of XML for structured information. It can be interpreted from this that the submission of summaries, reports and other narrative documents in XML format is not currently supported by the specification. Regulatory authorities and applicants could agree to use other formats regionally (including uses of the common formats in a different way from the above). Thus, if an applicant wishes to use XML for narrative documents, the applicant should contact the applicant's own regional regulatory authority, understanding that other regulatory authorities may not accept these XML files.

By using a hierarchical structure, XML allows you to relate two or more elements. This is accomplished by nesting one element within another.

Additional information about the element type is provided by attributes. Attributes are placed within the element types and are surrounded by quotation marks ("".) For example, if you wanted to show that the applicant name is presented in the English language, you could add this piece of information as an attribute. This could be represented in the XML file as <applicant XML:LANG="EN"> Worldwide Pharmaceuticals Inc.</applicant>.

XML files are read by a parser found in Internet browsers. Stylesheets provide the browser with the information to create tables, fonts, and colors for display.

The specific names of the element types and attributes as well as the valid syntax, structure and format for defining the XML elements are included in a file called document type definition (DTD). If the XML document does not follow the DTD, then the file will not be able to be used properly.

The top three lines of the XML file should include the XML version, the stylesheet type and address, and the DTD name and address.

Additional information about the XML standard can be found at the W3C Web site at www.w3.org.

SVG Files

SVG is a language for describing two-dimensional graphics in XML. SVG allows for three types of graphic objects: vector graphic shapes (e.g., paths consisting of straight lines and curves), images, and text. Graphical objects can be grouped, styled, transformed and composited into previously rendered objects. Text can be in any XML namespace suitable to the application, which enhances searchability

and accessibility of the SVG graphics. The feature set includes nested transformations, clipping paths, alpha masks, filter effects, template objects, and extensibility.

SVG drawings can be dynamic and interactive. The Document Object Model (DOM) for SVG, which includes the full XML DOM, allows for straightforward and efficient vector graphics animation via scripting. A rich set of event handlers such as onmouseover and onclick can be assigned to any SVG graphical object. Because of its compatibility and leveraging of other Web standards, features like scripting can be done on SVG elements and other XML elements from different namespaces simultaneously within the same Web page. ⁸

The specific use of SVG in a submission should be discussed with the regulatory authority.

-

⁸ This description of SVG is from w3c Web page http://www.w3.org/graphics/svg

Appendix 8: XML eCTD DTD

```
<?xml version="1.0" encoding="UTF-8"?>
<!-- Changes prior to Version 1.00 captured in file
    "Historical Changes.txt
  ICH eCTD DTD
  Version 1.0 - March 6, 2002
  Version 3.0 - Sept 11, 2002
  Version 3.0 - Oct 1, 2002
  Version 3.0 - Oct 8, 2002
  Version 3.1 - Nov 11, 2003
        Version 3.2 - Nov 21, 2003
Changes in version 3.1
        ID was changed to REQUIRED in the following four locations:
                 xml:lang CDATA #IMPLIED">
     <!ELEMENT leaf (title, link-text?)>
                         <!ATTLIST leaf
                                  ID ID #REQUIRED <attlist continues>
                 <!ELEMENT xref EMPTY>
                         <!ATTLIST xref
                                  ID ID #REQUIRED <attlist continues>
                 <!ELEMENT node-extension (title, (leaf | node-extension)+)>
                          <!ATTLIST node-extension
                                  ID ID #REQUIRED
                                  xml:lang CDATA #IMPLIED>
Changes in version 3.2
        Indication attribute was changed to REQUIRED in the following two locations:
                 <!ATTLIST m2-7-3-summary-of-clinical-efficacy
                 %att:
                 indication CDATA #REQUIRED
                 <!ATTLIST m5-3-5-reports-of-efficacy-and-safety-studies
                 indication CDATA #REQUIRED
        Since ID is only needed for files referenced in a LEAF, changed ID back to IMPLIED for:
                 <!ENTITY % att " ID ID #REQUIRED
                         xml:lang CDATA #IMPLIED">
                 <!ELEMENT node-extension (title, (leaf | node-extension)+)>
                 <!ATTLIST node-extension
                         ID ID #REQUIRED
                         xml:lang CDATA #IMPLIED>
End of changes
<!ENTITY % att " ID ID #IMPLIED
 xml:lang CDATA #IMPLIED">
<!-- Top-level element -->
```

```
<!ELEMENT ectd:ectd (m1-administrative-information-and-prescribing-information?, m2-common-technical-
document-summaries?, m3-quality?, m4-nonclinical-study-reports?, m5-clinical-study-reports?)>
<!ATTLIST ectd:ectd
       xmlns:ectd CDATA #FIXED "http://www.ich.org/ectd"
       xmlns:xlink CDATA #FIXED "http://www.w3c.org/1999/xlink"
       xml:lang CDATA #IMPLIED
       dtd-version CDATA #FIXED "3.2"
<!-- ==
<!-- Leaf content -->
<!ELEMENT leaf (title, link-text?)>
<!ATTLIST leaf
       ID ID #REOUIRED
       application-version CDATA #IMPLIED
       version CDATA #IMPLIED
       font-library CDATA #IMPLIED
       operation (new | append | replace | delete) #REQUIRED
       modified-file CDATA #IMPLIED
       checksum CDATA #REQUIRED
       checksum-type CDATA #REQUIRED
       keywords CDATA #IMPLIED
       xmlns:xlink CDATA #FIXED "http://www.w3c.org/1999/xlink"
       xlink:type CDATA #FIXED "simple"
       xlink:role CDATA #IMPLIED
       xlink:href CDATA #IMPLIED
       xlink:show (new | replace | embed | other | none) #IMPLIED
       xlink:actuate (onLoad | onRequest | other | none) #IMPLIED
       xml:lang CDATA #IMPLIED
<!ELEMENT title (#PCDATA)>
<!ATTLIST title
       ID ID #IMPLIED
>
<!ELEMENT link-text (#PCDATA | xref)*>
<!ATTLIST link-text
       ID ID #IMPLIED
>
<!ELEMENT xref EMPTY>
<!ATTLIST xref
       ID ID #REQUIRED
       xmlns:xlink CDATA #FIXED "http://www.w3c.org/1999/xlink"
       xlink:type CDATA #FIXED "simple"
       xlink:role CDATA #IMPLIED
       xlink:title CDATA #REQUIRED
       xlink:href CDATA #REQUIRED
       xlink:show (new | replace | embed | other | none) #IMPLIED
       xlink:actuate (onLoad | onRequest | other | none) #IMPLIED
<!ELEMENT node-extension (title, (leaf | node-extension)+)>
<!ATTLIST node-extension
       ID ID #IMPLIED
       xml:lang CDATA #IMPLIED
<!-- CTD Backbone structures -->
<!ELEMENT m1-administrative-information-and-prescribing-information (leaf*)>
<!ATTLIST m1-administrative-information-and-prescribing-information
```

```
<!ELEMENT m2-common-technical-document-summaries (leaf*, m2-2-introduction?, m2-3-quality-overall-
summary?, m2-4-nonclinical-overview?, m2-5-clinical-overview?, m2-6-nonclinical-written-and-tabulated-
summaries?, m2-7-clinical-summary?)>
<!ATTLIST m2-common-technical-document-summaries
<!ELEMENT m2-2-introduction ((leaf | node-extension)*)>
<!ATTLIST m2-2-introduction
        %att:
<!ELEMENT m2-3-quality-overall-summary (leaf*, m2-3-introduction?, m2-3-s-drug-substance*, m2-3-p-drug-
product*, m2-3-a-appendices?, m2-3-r-regional-information?)>
<!ATTLIST m2-3-quality-overall-summary
<!ELEMENT m2-3-introduction ((leaf | node-extension)*)>
<!ATTLIST m2-3-introduction
         %att:
<!ELEMENT m2-3-s-drug-substance ((leaf | node-extension)*)>
<!ATTLIST m2-3-s-drug-substance
         %att:
        substance CDATA #REQUIRED
        manufacturer CDATA #REQUIRED
<!ELEMENT m2-3-p-drug-product ((leaf | node-extension)*)>
<!ATTLIST m2-3-p-drug-product
         %att;
        product-name CDATA #IMPLIED
        dosageform CDATA #IMPLIED
        manufacturer CDATA #IMPLIED
<!ELEMENT m2-3-a-appendices ((leaf | node-extension)*)>
<!ATTLIST m2-3-a-appendices
        %att;
<!ELEMENT m2-3-r-regional-information ((leaf | node-extension)*)>
<!ATTLIST m2-3-r-regional-information
         %att:
<!ELEMENT m2-4-nonclinical-overview ((leaf | node-extension)*)>
<!ATTLIST m2-4-nonclinical-overview
         %att;
<!ELEMENT m2-5-clinical-overview ((leaf | node-extension)*)>
<!ATTLIST m2-5-clinical-overview
         %att
<!ELEMENT m2-6-nonclinical-written-and-tabulated-summaries (leaf*, m2-6-1-introduction?, m2-6-2-pharmacology-
written-summary?, m2-6-3-pharmacology-tabulated-summary?, m2-6-4-pharmacokinetics-written-summary?, m2-6-5-
pharmacokinetics-tabulated-summary?, m2-6-6-toxicology-written-summary?, m2-6-7-toxicology-tabulated-
summary?)>
<!ATTLIST m2-6-nonclinical-written-and-tabulated-summaries
<!ELEMENT m2-6-1-introduction ((leaf | node-extension)*)>
<!ATTLIST m2-6-1-introduction
<!ELEMENT m2-6-2-pharmacology-written-summary ((leaf | node-extension)*)>
<!ATTLIST m2-6-2-pharmacology-written-summary
        %att;
```

```
<!ELEMENT m2-6-3-pharmacology-tabulated-summary ((leaf | node-extension)*)>
<!ATTLIST m2-6-3-pharmacology-tabulated-summary
<!ELEMENT m2-6-4-pharmacokinetics-written-summary ((leaf | node-extension)*)>
<!ATTLIST m2-6-4-pharmacokinetics-written-summary
<!ELEMENT m2-6-5-pharmacokinetics-tabulated-summary ((leaf | node-extension)*)>
<!ATTLIST m2-6-5-pharmacokinetics-tabulated-summary
<!ELEMENT m2-6-6-toxicology-written-summary ((leaf | node-extension)*)>
<!ATTLIST m2-6-6-toxicology-written-summary
         %att;
<!ELEMENT m2-6-7-toxicology-tabulated-summary ((leaf | node-extension)*)>
<!ATTLIST m2-6-7-toxicology-tabulated-summary
         %att;
<!ELEMENT m2-7-clinical-summary (leaf*, m2-7-1-summary-of-biopharmaceutic-studies-and-associated-analytical-
methods?, m2-7-2-summary-of-clinical-pharmacology-studies?, m2-7-3-summary-of-clinical-efficacy*, m2-7-4-
summary-of-clinical-safety?, m2-7-5-literature-references?, m2-7-6-synopses-of-individual-studies?)>
<!ATTLIST m2-7-clinical-summary
         %att;
>
<!ELEMENT m2-7-1-summary-of-biopharmaceutic-studies-and-associated-analytical-methods ((leaf | node-
extension)*)>
<!ATTLIST m2-7-1-summary-of-biopharmaceutic-studies-and-associated-analytical-methods
<!ELEMENT m2-7-2-summary-of-clinical-pharmacology-studies ((leaf | node-extension)*)>
<!ATTLIST m2-7-2-summary-of-clinical-pharmacology-studies
         %att;
<!ELEMENT m2-7-3-summary-of-clinical-efficacy ((leaf | node-extension)*)>
<!ATTLIST m2-7-3-summary-of-clinical-efficacy
         % att:
         indication CDATA #REQUIRED
>
<!ELEMENT m2-7-4-summary-of-clinical-safety ((leaf | node-extension)*)>
<!ATTLIST m2-7-4-summary-of-clinical-safety
         %att;
<!ELEMENT m2-7-5-literature-references ((leaf | node-extension)*)>
<!ATTLIST m2-7-5-literature-references
         %att:
<!ELEMENT m2-7-6-synopses-of-individual-studies ((leaf | node-extension)*)>
<!ATTLIST m2-7-6-synopses-of-individual-studies
<!ELEMENT m3-quality (leaf*, m3-2-body-of-data?, m3-3-literature-references?)>
<!ATTLIST m3-quality
<!ELEMENT m3-2-body-of-data (leaf*, m3-2-s-drug-substance*, m3-2-p-drug-product*, m3-2-a-appendices?, m3-2-r-
regional-information?)>
<!ATTLIST m3-2-body-of-data
         %att;
>
```

```
<!ELEMENT m3-2-s-drug-substance (leaf*, m3-2-s-1-general-information?, m3-2-s-2-manufacture?, m3-2-s-3-
characterisation?, m3-2-s-4-control-of-drug-substance?, m3-2-s-5-reference-standards-or-materials?, m3-2-s-6-
container-closure-system?, m3-2-s-7-stability?)>
<!ATTLIST m3-2-s-drug-substance
         %att:
         substance CDATA #REQUIRED
         manufacturer CDATA #REQUIRED
<!ELEMENT m3-2-s-1-general-information (leaf*, m3-2-s-1-1-nomenclature?, m3-2-s-1-2-structure?, m3-2-s-1-3-
general-properties?)>
<!ATTLIST m3-2-s-1-general-information
         %att:
<!ELEMENT m3-2-s-1-1-nomenclature ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-1-1-nomenclature
         %att;
<!ELEMENT m3-2-s-1-2-structure ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-1-2-structure
         %att;
<!ELEMENT m3-2-s-1-3-general-properties ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-1-3-general-properties
         % att:
>
<!ELEMENT m3-2-s-2-manufacture (leaf*, m3-2-s-2-1-manufacturer?, m3-2-s-2-2-description-of-manufacturing-
process-and-process-controls?, m3-2-s-2-3-control-of-materials?, m3-2-s-2-4-controls-of-critical-steps-and-
intermediates?, m3-2-s-2-5-process-validation-and-or-evaluation?, m3-2-s-2-6-manufacturing-process-development?)>
<!ATTLIST m3-2-s-2-manufacture
         %att;
<!ELEMENT m3-2-s-2-1-manufacturer ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-2-1-manufacturer
         % att:
>
<!ELEMENT m3-2-s-2-description-of-manufacturing-process-and-process-controls ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-2-description-of-manufacturing-process-and-process-controls
>
<!ELEMENT m3-2-s-2-3-control-of-materials ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-2-3-control-of-materials
<!ELEMENT m3-2-s-2-4-controls-of-critical-steps-and-intermediates ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-2-4-controls-of-critical-steps-and-intermediates
         %att:
<!ELEMENT m3-2-s-2-5-process-validation-and-or-evaluation ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-2-5-process-validation-and-or-evaluation
<!ELEMENT m3-2-s-2-6-manufacturing-process-development ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-2-6-manufacturing-process-development
<!ELEMENT m3-2-s-3-characterisation (leaf*, m3-2-s-3-1-elucidation-of-structure-and-other-characteristics?, m3-2-s-
3-2-impurities?)>
<!ATTLIST m3-2-s-3-characterisation
         %att:
<!ELEMENT m3-2-s-3-1-elucidation-of-structure-and-other-characteristics ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-3-1-elucidation-of-structure-and-other-characteristics
```

```
%att;
<!ELEMENT m3-2-s-3-2-impurities ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-3-2-impurities
<!ELEMENT m3-2-s-4-control-of-drug-substance (leaf*, m3-2-s-4-1-specification?, m3-2-s-4-2-analytical-
procedures?, m3-2-s-4-3-validation-of-analytical-procedures?, m3-2-s-4-4-batch-analyses?, m3-2-s-4-5-justification-of-
specification?)>
<!ATTLIST m3-2-s-4-control-of-drug-substance
         %att:
<!ELEMENT m3-2-s-4-1-specification ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-4-1-specification
         % att:
<!ELEMENT m3-2-s-4-2-analytical-procedures ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-4-2-analytical-procedures
<!ELEMENT m3-2-s-4-3-validation-of-analytical-procedures ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-4-3-validation-of-analytical-procedures
<!ELEMENT m3-2-s-4-4-batch-analyses ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-4-4-batch-analyses
         %att;
<!ELEMENT m3-2-s-4-5-justification-of-specification ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-4-5-justification-of-specification
<!ELEMENT m3-2-s-5-reference-standards-or-materials ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-5-reference-standards-or-materials
         %att;
<!ELEMENT m3-2-s-6-container-closure-system ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-6-container-closure-system
         % att:
<!ELEMENT m3-2-s-7-stability (leaf*, m3-2-s-7-1-stability-summary-and-conclusions?, m3-2-s-7-2-post-approval-
stability-protocol-and-stability-commitment?, m3-2-s-7-3-stability-data?)>
<!ATTLIST m3-2-s-7-stability
         %att;
<!ELEMENT m3-2-s-7-1-stability-summary-and-conclusions ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-7-1-stability-summary-and-conclusions
         %att:
<!ELEMENT m3-2-s-7-2-post-approval-stability-protocol-and-stability-commitment ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-7-2-post-approval-stability-protocol-and-stability-commitment
<!ELEMENT m3-2-s-7-3-stability-data ((leaf | node-extension)*)>
<!ATTLIST m3-2-s-7-3-stability-data
<!ELEMENT m3-2-p-drug-product (leaf*, m3-2-p-1-description-and-composition-of-the-drug-product?, m3-2-p-2-
pharmaceutical-development?, m3-2-p-3-manufacture?, m3-2-p-4-control-of-excipients*, m3-2-p-5-control-of-drug-
product?, m3-2-p-6-reference-standards-or-materials?, m3-2-p-7-container-closure-system?, m3-2-p-8-stability?)>
<!ATTLIST m3-2-p-drug-product
         %att;
```

```
product-name CDATA #IMPLIED
         dosageform CDATA #IMPLIED
         manufacturer CDATA #IMPLIED
<!ELEMENT m3-2-p-1-description-and-composition-of-the-drug-product ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-1-description-and-composition-of-the-drug-product
<!ELEMENT m3-2-p-2-pharmaceutical-development ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-2-pharmaceutical-development
<!ELEMENT m3-2-p-3-manufacture (leaf*, m3-2-p-3-1-manufacturers?, m3-2-p-3-2-batch-formula?, m3-2-p-3-3-
description-of-manufacturing-process-and-process-controls?, m3-2-p-3-4-controls-of-critical-steps-and-intermediates?,
m3-2-p-3-5-process-validation-and-or-evaluation?)>
<!ATTLIST m3-2-p-3-manufacture
         %att;
<!ELEMENT m3-2-p-3-1-manufacturers ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-3-1-manufacturers
         %att;
<!ELEMENT m3-2-p-3-2-batch-formula ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-3-2-batch-formula
         %att;
<!ELEMENT m3-2-p-3-3-description-of-manufacturing-process-and-process-controls ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-3-3-description-of-manufacturing-process-and-process-controls
<!ELEMENT m3-2-p-3-4-controls-of-critical-steps-and-intermediates ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-3-4-controls-of-critical-steps-and-intermediates
<!ELEMENT m3-2-p-3-5-process-validation-and-or-evaluation ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-3-5-process-validation-and-or-evaluation
<!ELEMENT m3-2-p-4-control-of-excipients (leaf*, m3-2-p-4-1-specifications?, m3-2-p-4-2-analytical-procedures?,
m3-2-p-4-3-validation-of-analytical-procedures?, m3-2-p-4-4-justification-of-specifications?, m3-2-p-4-5-excipients-
of-human-or-animal-origin?, m3-2-p-4-6-novel-excipients?)>
<!ATTLIST m3-2-p-4-control-of-excipients
         excipient CDATA #IMPLIED
<!ELEMENT m3-2-p-4-1-specifications ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-4-1-specifications
         %att:
<!ELEMENT m3-2-p-4-2-analytical-procedures ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-4-2-analytical-procedures
<!ELEMENT m3-2-p-4-3-validation-of-analytical-procedures ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-4-3-validation-of-analytical-procedures
<!ELEMENT m3-2-p-4-4-justification-of-specifications ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-4-4-justification-of-specifications
<!ELEMENT m3-2-p-4-5-excipients-of-human-or-animal-origin ((leaf | node-extension)*)>
```

```
<!ATTLIST m3-2-p-4-5-excipients-of-human-or-animal-origin
         %att;
<!ELEMENT m3-2-p-4-6-novel-excipients ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-4-6-novel-excipients
<!ELEMENT m3-2-p-5-control-of-drug-product (leaf*, m3-2-p-5-1-specifications?, m3-2-p-5-2-analytical-
procedures?, m3-2-p-5-3-validation-of-analytical-procedures?, m3-2-p-5-4-batch-analyses?, m3-2-p-5-5-
characterisation-of-impurities?, m3-2-p-5-6-justification-of-specifications?)>
<!ATTLIST m3-2-p-5-control-of-drug-product
<!ELEMENT m3-2-p-5-1-specifications ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-5-1-specifications
         %att;
<!ELEMENT m3-2-p-5-2-analytical-procedures ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-5-2-analytical-procedures
         %att;
<!ELEMENT m3-2-p-5-3-validation-of-analytical-procedures ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-5-3-validation-of-analytical-procedures
         %att:
>
<!ELEMENT m3-2-p-5-4-batch-analyses ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-5-4-batch-analyses
         %att:
<!ELEMENT m3-2-p-5-5-characterisation-of-impurities ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-5-5-characterisation-of-impurities
>
<!ELEMENT m3-2-p-5-6-justification-of-specifications ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-5-6-justification-of-specifications
         %att;
>
<!ELEMENT m3-2-p-6-reference-standards-or-materials ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-6-reference-standards-or-materials
>
<!ELEMENT m3-2-p-7-container-closure-system ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-7-container-closure-system
>
<!ELEMENT m3-2-p-8-stability (leaf*, m3-2-p-8-1-stability-summary-and-conclusion?, m3-2-p-8-2-post-approval-
stability-protocol-and-stability-commitment?, m3-2-p-8-3-stability-data?)>
<!ATTLIST m3-2-p-8-stability
         %att;
<!ELEMENT m3-2-p-8-1-stability-summary-and-conclusion ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-8-1-stability-summary-and-conclusion
         %att;
<!ELEMENT m3-2-p-8-2-post-approval-stability-protocol-and-stability-commitment ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-8-2-post-approval-stability-protocol-and-stability-commitment
         %att;
<!ELEMENT m3-2-p-8-3-stability-data ((leaf | node-extension)*)>
<!ATTLIST m3-2-p-8-3-stability-data
         %att;
>
```

```
<!ELEMENT m3-2-a-appendices (leaf*, m3-2-a-1-facilities-and-equipment*, m3-2-a-2-adventitious-agents-safety-
evaluation*, m3-2-a-3-excipients?)>
<!ATTLIST m3-2-a-appendices
<!ELEMENT m3-2-a-1-facilities-and-equipment ((leaf | node-extension)*)>
<!ATTLIST m3-2-a-1-facilities-and-equipment
         manufacturer CDATA #IMPLIED
        substance CDATA #IMPLIED
        dosageform CDATA #IMPLIED
        product-name CDATA #IMPLIED
<!ELEMENT m3-2-a-2-adventitious-agents-safety-evaluation ((leaf | node-extension)*)>
<!ATTLIST m3-2-a-2-adventitious-agents-safety-evaluation
         manufacturer CDATA #IMPLIED
         substance CDATA #IMPLIED
        dosageform CDATA #IMPLIED
        product-name CDATA #IMPLIED
<!ELEMENT m3-2-a-3-excipients ((leaf | node-extension)*)>
<!ATTLIST m3-2-a-3-excipients
        %att;
<!ELEMENT m3-2-r-regional-information ((leaf | node-extension)*)>
<!ATTLIST m3-2-r-regional-information
        %att;
<!ELEMENT m3-3-literature-references ((leaf | node-extension)*)>
<!ATTLIST m3-3-literature-references
>
<!ELEMENT m4-nonclinical-study-reports (leaf*, m4-2-study-reports?, m4-3-literature-references?)>
<!ATTLIST m4-nonclinical-study-reports
>
<!ELEMENT m4-2-study-reports (leaf*, m4-2-1-pharmacology?, m4-2-2-pharmacokinetics?, m4-2-3-toxicology?)>
<!ATTLIST m4-2-study-reports
         %att:
>
<!ELEMENT m4-2-1-pharmacology (leaf*, m4-2-1-1-primary-pharmacodynamics?, m4-2-1-2-secondary-
pharmacodynamics?, m4-2-1-3-safety-pharmacology?, m4-2-1-4-pharmacodynamic-drug-interactions?)>
<!ATTLIST m4-2-1-pharmacology
         %att;
<!ELEMENT m4-2-1-1-primary-pharmacodynamics ((leaf | node-extension)*)>
<!ATTLIST m4-2-1-1-primary-pharmacodynamics
        %att;
<!ELEMENT m4-2-1-2-secondary-pharmacodynamics ((leaf | node-extension)*)>
<!ATTLIST m4-2-1-2-secondary-pharmacodynamics
         %att;
<!ELEMENT m4-2-1-3-safety-pharmacology ((leaf | node-extension)*)>
<!ATTLIST m4-2-1-3-safety-pharmacology
        %att;
<!ELEMENT m4-2-1-4-pharmacodynamic-drug-interactions ((leaf | node-extension)*)>
<!ATTLIST m4-2-1-4-pharmacodynamic-drug-interactions
         %att;
>
```

```
<!ELEMENT m4-2-2-pharmacokinetics (leaf*, m4-2-2-1-analytical-methods-and-validation-reports?, m4-2-2-2-
absorption?, m4-2-2-3-distribution?, m4-2-2-4-metabolism?, m4-2-2-5-excretion?, m4-2-2-6-pharmacokinetic-drug-
interactions?, m4-2-2-7-other-pharmacokinetic-studies?)>
<!ATTLIST m4-2-2-pharmacokinetics
<!ELEMENT m4-2-2-1-analytical-methods-and-validation-reports ((leaf | node-extension)*)>
<!ATTLIST m4-2-2-1-analytical-methods-and-validation-reports
<!ELEMENT m4-2-2-absorption ((leaf | node-extension)*)>
<!ATTLIST m4-2-2-absorption
         %att:
<!ELEMENT m4-2-2-3-distribution ((leaf | node-extension)*)>
<!ATTLIST m4-2-2-3-distribution
         %att:
<!ELEMENT m4-2-2-4-metabolism ((leaf | node-extension)*)>
<!ATTLIST m4-2-2-4-metabolism
         %att:
<!ELEMENT m4-2-2-5-excretion ((leaf | node-extension)*)>
<!ATTLIST m4-2-2-5-excretion
         %att:
<!ELEMENT m4-2-2-6-pharmacokinetic-drug-interactions ((leaf | node-extension)*)>
<!ATTLIST m4-2-2-6-pharmacokinetic-drug-interactions
         %att;
<!ELEMENT m4-2-2-7-other-pharmacokinetic-studies ((leaf | node-extension)*)>
<!ATTLIST m4-2-2-7-other-pharmacokinetic-studies
         %att;
<!ELEMENT m4-2-3-toxicology (leaf*, m4-2-3-1-single-dose-toxicity?, m4-2-3-2-repeat-dose-toxicity?, m4-2-3-3-
genotoxicity?, m4-2-3-4-carcinogenicity?, m4-2-3-5-reproductive-and-developmental-toxicity?, m4-2-3-6-local-
tolerance?, m4-2-3-7-other-toxicity-studies?)>
<!ATTLIST m4-2-3-toxicology
         % att:
<!ELEMENT m4-2-3-1-single-dose-toxicity ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-1-single-dose-toxicity
         %att;
<!ELEMENT m4-2-3-2-repeat-dose-toxicity ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-2-repeat-dose-toxicity
         %att;
<!ELEMENT m4-2-3-3-genotoxicity (leaf*, m4-2-3-3-1-in-vitro?, m4-2-3-3-2-in-vivo?)>
<!ATTLIST m4-2-3-3-genotoxicity
         %att;
<!ELEMENT m4-2-3-3-1-in-vitro ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-3-1-in-vitro
         %att:
<!ELEMENT m4-2-3-3-2-in-vivo ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-3-2-in-vivo
         %att;
<!ELEMENT m4-2-3-4-carcinogenicity (leaf*, m4-2-3-4-1-long-term-studies?, m4-2-3-4-2-short-or-medium-term-
studies?, m4-2-3-4-3-other-studies?)>
```

```
<!ATTLIST m4-2-3-4-carcinogenicity
         %att;
<!ELEMENT m4-2-3-4-1-long-term-studies ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-4-1-long-term-studies
<!ELEMENT m4-2-3-4-2-short-or-medium-term-studies ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-4-2-short-or-medium-term-studies
         %att;
>
<!ELEMENT m4-2-3-4-3-other-studies ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-4-3-other-studies
<!ELEMENT m4-2-3-5-reproductive-and-developmental-toxicity (leaf*, m4-2-3-5-1-fertility-and-early-embryonic-
development?, m4-2-3-5-2-embryo-fetal-development?, m4-2-3-5-3-prenatal-and-postnatal-development-including-
maternal-function?, m4-2-3-5-4-studies-in-which-the-offspring-juvenile-animals-are-dosed-and-or-further-evaluated?)>
<!ATTLIST m4-2-3-5-reproductive-and-developmental-toxicity
<!ELEMENT m4-2-3-5-1-fertility-and-early-embryonic-development ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-5-1-fertility-and-early-embryonic-development
         % att:
<!ELEMENT m4-2-3-5-2-embryo-fetal-development ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-5-2-embryo-fetal-development
         %att:
<!ELEMENT m4-2-3-5-3-prenatal-and-postnatal-development-including-maternal-function ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-5-3-prenatal-and-postnatal-development-including-maternal-function
>
<!ELEMENT m4-2-3-5-4-studies-in-which-the-offspring-juvenile-animals-are-dosed-and-or-further-evaluated ((leaf |
node-extension)*)>
<!ATTLIST m4-2-3-5-4-studies-in-which-the-offspring-juvenile-animals-are-dosed-and-or-further-evaluated
<!ELEMENT m4-2-3-6-local-tolerance ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-6-local-tolerance
         %att:
<!ELEMENT m4-2-3-7-other-toxicity-studies (leaf*, m4-2-3-7-1-antigenicity?, m4-2-3-7-2-immunotoxicity?, m4-2-3-
7-3-mechanistic-studies?, m4-2-3-7-4-dependence?, m4-2-3-7-5-metabolites?, m4-2-3-7-6-impurities?, m4-2-3-7-7-
other?)>
<!ATTLIST m4-2-3-7-other-toxicity-studies
         %att:
<!ELEMENT m4-2-3-7-1-antigenicity ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-7-1-antigenicity
         %att;
<!ELEMENT m4-2-3-7-2-immunotoxicity ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-7-2-immunotoxicity
         %att:
<!ELEMENT m4-2-3-7-3-mechanistic-studies ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-7-3-mechanistic-studies
         %att;
<!ELEMENT m4-2-3-7-4-dependence ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-7-4-dependence
```

```
%att:
<!ELEMENT m4-2-3-7-5-metabolites ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-7-5-metabolites
         %att:
<!ELEMENT m4-2-3-7-6-impurities ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-7-6-impurities
<!ELEMENT m4-2-3-7-7-other ((leaf | node-extension)*)>
<!ATTLIST m4-2-3-7-7-other
         %att
<!ELEMENT m4-3-literature-references ((leaf | node-extension)*)>
<!ATTLIST m4-3-literature-references
         %att:
<!ELEMENT m5-clinical-study-reports (leaf*, m5-2-tabular-listing-of-all-clinical-studies?, m5-3-clinical-study-
reports?, m5-4-literature-references?)>
<!ATTLIST m5-clinical-study-reports
         %att:
<!ELEMENT m5-2-tabular-listing-of-all-clinical-studies ((leaf | node-extension)*)>
<!ATTLIST m5-2-tabular-listing-of-all-clinical-studies
         %att;
<!ELEMENT m5-3-clinical-study-reports (leaf*, m5-3-1-reports-of-biopharmaceutic-studies?, m5-3-2-reports-of-
studies-pertinent-to-pharmacokinetics-using-human-biomaterials?, m5-3-3-reports-of-human-pharmacokinetics-pk-
studies?, m5-3-4-reports-of-human-pharmacodynamics-pd-studies?, m5-3-5-reports-of-efficacy-and-safety-studies*,
m5-3-6-reports-of-postmarketing-experience?, m5-3-7-case-report-forms-and-individual-patient-listings?)>
<!ATTLIST m5-3-clinical-study-reports
         %att;
>
<!ELEMENT m5-3-1-reports-of-biopharmaceutic-studies (leaf*, m5-3-1-1-bioavailability-study-reports?, m5-3-1-2-
comparative-ba-and-bioequivalence-study-reports?, m5-3-1-3-in-vitro-in-vivo-correlation-study-reports?, m5-3-1-4-
reports-of-bioanalytical-and-analytical-methods-for-human-studies?)>
<!ATTLIST m5-3-1-reports-of-biopharmaceutic-studies
<!ELEMENT m5-3-1-1-bioavailability-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-1-1-bioavailability-study-reports
         %att;
<!ELEMENT m5-3-1-2-comparative-ba-and-bioequivalence-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-1-2-comparative-ba-and-bioequivalence-study-reports
         %att;
<!ELEMENT m5-3-1-3-in-vitro-in-vivo-correlation-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-1-3-in-vitro-in-vivo-correlation-study-reports
         %att:
<!ELEMENT m5-3-1-4-reports-of-bioanalytical-and-analytical-methods-for-human-studies ((leaf | node-extension)*)>
<!ATTLIST m5-3-1-4-reports-of-bioanalytical-and-analytical-methods-for-human-studies
         %att:
<!ELEMENT m5-3-2-reports-of-studies-pertinent-to-pharmacokinetics-using-human-biomaterials (leaf*, m5-3-2-1-
plasma-protein-binding-study-reports?, m5-3-2-2-reports-of-hepatic-metabolism-and-drug-interaction-studies?, m5-3-
2-3-reports-of-studies-using-other-human-biomaterials?)>
<!ATTLIST m5-3-2-reports-of-studies-pertinent-to-pharmacokinetics-using-human-biomaterials
         %att:
>
```

```
<!ELEMENT m5-3-2-1-plasma-protein-binding-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-2-1-plasma-protein-binding-study-reports
<!ELEMENT m5-3-2-2-reports-of-hepatic-metabolism-and-drug-interaction-studies ((leaf | node-extension)*)>
<!ATTLIST m5-3-2-2-reports-of-hepatic-metabolism-and-drug-interaction-studies
<!ELEMENT m5-3-2-3-reports-of-studies-using-other-human-biomaterials ((leaf | node-extension)*)>
<!ATTLIST m5-3-2-3-reports-of-studies-using-other-human-biomaterials
<!ELEMENT m5-3-3-reports-of-human-pharmacokinetics-pk-studies (leaf*, m5-3-3-1-healthy-subject-pk-and-initial-
tolerability-study-reports?, m5-3-3-2-patient-pk-and-initial-tolerability-study-reports?, m5-3-3-3-intrinsic-factor-pk-
study-reports?, m5-3-3-4-extrinsic-factor-pk-study-reports?, m5-3-3-5-population-pk-study-reports?)>
<!ATTLIST m5-3-3-reports-of-human-pharmacokinetics-pk-studies
<!ELEMENT m5-3-3-1-healthy-subject-pk-and-initial-tolerability-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-3-1-healthy-subject-pk-and-initial-tolerability-study-reports
<!ELEMENT m5-3-3-2-patient-pk-and-initial-tolerability-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-3-2-patient-pk-and-initial-tolerability-study-reports
<!ELEMENT m5-3-3-intrinsic-factor-pk-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-3-3-intrinsic-factor-pk-study-reports
         %att;
<!ELEMENT m5-3-3-4-extrinsic-factor-pk-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-3-4-extrinsic-factor-pk-study-reports
         %att;
<!ELEMENT m5-3-3-5-population-pk-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-3-5-population-pk-study-reports
         %att;
<!ELEMENT m5-3-4-reports-of-human-pharmacodynamics-pd-studies (leaf*, m5-3-4-1-healthy-subject-pd-and-pk-
pd-study-reports?, m5-3-4-2-patient-pd-and-pk-pd-study-reports?)>
<!ATTLIST m5-3-4-reports-of-human-pharmacodynamics-pd-studies
<!ELEMENT m5-3-4-1-healthy-subject-pd-and-pk-pd-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-4-1-healthy-subject-pd-and-pk-pd-study-reports
<!ELEMENT m5-3-4-2-patient-pd-and-pk-pd-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-4-2-patient-pd-and-pk-pd-study-reports
<!ELEMENT m5-3-5-reports-of-efficacy-and-safety-studies (leaf*, m5-3-5-1-study-reports-of-controlled-clinical-
studies-pertinent-to-the-claimed-indication?, m5-3-5-2-study-reports-of-uncontrolled-clinical-studies?, m5-3-5-3-
reports-of-analyses-of-data-from-more-than-one-study?, m5-3-5-4-other-study-reports?)>
<!ATTLIST m5-3-5-reports-of-efficacy-and-safety-studies
         indication CDATA #REQUIRED
<!ELEMENT m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication ((leaf | node-
extension)*)>
<!ATTLIST m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication
         %att:
```

```
<!ELEMENT m5-3-5-2-study-reports-of-uncontrolled-clinical-studies ((leaf | node-extension)*)>
<!ATTLIST m5-3-5-2-study-reports-of-uncontrolled-clinical-studies
<!ELEMENT m5-3-5-3-reports-of-analyses-of-data-from-more-than-one-study ((leaf | node-extension)*)>
<!ATTLIST m5-3-5-3-reports-of-analyses-of-data-from-more-than-one-study
<!ELEMENT m5-3-5-4-other-study-reports ((leaf | node-extension)*)>
<!ATTLIST m5-3-5-4-other-study-reports
         %att;
<!ELEMENT m5-3-6-reports-of-postmarketing-experience ((leaf | node-extension)*)>
<!ATTLIST m5-3-6-reports-of-postmarketing-experience
         %att;
<!ELEMENT m5-3-7-case-report-forms-and-individual-patient-listings ((leaf | node-extension)*)>
<!ATTLIST m5-3-7-case-report-forms-and-individual-patient-listings
         % att;
<!ELEMENT m5-4-literature-references ((leaf | node-extension)*)>
<!ATTLIST m5-4-literature-references
         %att;
```

INTERNATIONAL CONFERENCE ON HARMONISATION OF TECHNICAL REQUIREMENTS FOR REGISTRATION OF PHARMACEUTICALS FOR HUMAN USE

ICH M2 EWG

The eCTD Backbone File Specification for Study Tagging Files

This specification has been developed by the ICH M2 Expert Working Group and maintained by the eCTD Implementation Working Group in accordance with the ICH Process as pertains to the M2 EWG and eCTD change control as it pertains to the eCTD IWG.

The eCTD Backbone Files Specification for Study Tagging Files

Revision History

Date	Version	Summary of Changes
2003-08-13	1.0	Original version
2004-03-09	1.1	Clarifications to the original version. Constraints from original version
		including redundancy of information found in the index.xml file. Added
		duration category and values. Added "other" as route of administration
		value. Added new name attribute values for file tag element.
		Versions between 1.1 and 2.6 have been unpublished drafts
2004-11-17	2.6	Provides specification for both Cumulative and Accumulative
		Approaches for presentation of the Study Tagging Files (STF) with
		more detailed examples showing index and stf file relationships.
		Introduces ich-stf-v2-2.dtd, ich-stf-stylesheet-2-2.xsl and valid-
		values.xml.
2008-06-03	2.6.1	Removed Cumulative Approach to STF life cycle management and
		made accumulative approach the only option. Provided clarifications
		and corrections to text.

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The Specification for Study Tagging Files (STF)

In order to help identify all of the files associated with a study, information is needed on each document including the document title, subject matter (defined by the headings under which the documents are located in the table of contents), relationship to other documents (e.g., all documents for a specific study report are related to one another), revision information (i.e., new, replace, delete, append), the location of the document and information on the sequence that included the document. The eCTD backbone files (e.g., index.xml and us-regional.xml) include many of those information items. However, the eCTD backbone files do not contain enough information on the subject matter of several documents (e.g., study report documents) to support certain regulatory uses. This additional information is provided in the STF.

An STF should be provided with the submission of any file, or group of files belonging to a study in Modules 4 and 5. STFs are required by the United States, are not required in Europe and are not allowed in Japan. The STF provides for additional heading elements and heading attributes not currently provided by the eCTD DTD. In the STF, heading elements are called *file-tags* and are included in the *doc-content* element. Heading attributes are included in the *study-identifier* element.

Refer to regional guidance for information on STF applicability.

I. START AND STOP OF THE STF

The STF is an XML instance controlled by the ICH STF Document Type Definition (DTD). The most recent DTD can be found on the ICH web site (www.ich.org). The DTD should be placed in the *dtd* subfolder of the *util* folder. The stylesheet should be in the *style* subfolder of the *util* folder. You should provide a separate STF for each study in a sequence. The name for the STF XML file should start with the term "stf-" followed by the alphanumeric code used by the sponsor to unambiguously identify the study (i.e., study-id described below) and followed by ".xml" to complete the file name.

For every submission to FDA that includes one or more files pertaining to a specific study, you should provide an STF. You should place the STF for the specific study in the module folder with the corresponding study files. You should place a *leaf* element for the STF in the appropriate Module 4 or 5 eCTD Table of Contents element in the index.xml file for that sequence. The *operation* attribute for this leaf should have a value of "new" for the first STF for that specific study in that eCTD element and "append" for any subsequent STF for that same study in that eCTD element (see "Lifecycle Management of the Study Tagging File"). Subsequent STF files should only include information on the study documents being provided or modified by the subsequent sequence. The subsequent STF should always have a *modified-file* attribute that refers to the most recently submitted STF provided for that study in that eCTD element (i.e., you should not continually "append" to the original STF). The *version* attribute for leaf elements referencing a STF should cite the version of the STF DTD used to prepare that STF (e.g.,

"STF version 2.2") to allow the development of tools that can either ignore or highlight the presence of STF XML files.

The STF root element is *ectd:study*. The STF root element contains two child elements. The prolog part of the STF XML document and the STF root element contain information about the following:

- 1. Version of XML being used
- 2. Type of characters that are allowed in the file
- 3. Location of the standards that control the organization of the STF
- 4. Indication that the file information is ended (end tag)

A sample of the root element and last line of the STF is provided below:

```
<?xml version="1.0" encoding="UTF-8"?>
<?xml-stylesheet type="text/xsl" href="../../../util/style/ich-stf-
stylesheet.xsl"?>
<!DOCTYPE ectd:study SYSTEM "../../../util/dtd/ich-stf-v2-2.dtd">
<ectd:study xmlns:ectd="http://www.ich.org/ectd" xml:lang="en" dtd-
version="2.2" xmlns:xlink="http://www.w3.org/1999/xlink">
<!--All the elements will be provided after these elements and before the
last element closing tag named </ectd:study> -->
</ectd:study>
```

Note: "../../.." in the path expressions for STF DTD and STF stylesheet depend on the location where the STF instance is stored.

II. STUDY-IDENTIFIER ELEMENT

Information describing the study is contained in the *study-identifier* element of the STF. There are three elements contained in the *study-identifier* element: *title*, *study-id*, and *category*.

A. Title Element

The *title* element provides the full title of the study, not the title of each individual document.

B. study-id Element

The *study-id* is the internal alphanumeric code used by the sponsor to unambiguously identify this study.

C. Category Element

The *category* element provides an additional level of study organization not currently provided by the eCTD DTD. This element is only relevant for studies provided in the specific CTD sections cited below.

- 4.2.3.1 Single dose toxicity (grouped by species and route of administration)
- 4.2.3.2 Repeat dose toxicity (grouped by species, route of administration, and duration if applicable)
- 4.2.3.4.1 Long term [carcinogenicity] studies (grouped by species)
- 5.3.5.1 Study reports of controlled clinical studies pertinent to the claimed indication (grouped by type of control)

Other studies do not call for any category elements. When appropriate, you should place the *category* elements at the same level as the *title* and *study-id* elements. Each category element has the attributes *name* and *info-type*. Attribute and element values should be selected from the following table. The *info-type* attribute value should be "ich" for ICH approved values or one of the regional values (e.g., "jp", "eu", "ca", "us") for region specific values.

Category Element	values for "category" element
Attributes and Values	content choices
name="species"	
info-type="ich"	mouse
info-type="ich"	rat
info-type="ich"	hamster
info-type="ich"	other-rodent
info-type="ich"	rabbit
info-type="ich"	dog
info-type="ich"	non-human-primate
info-type="ich"	other-non-rodent-mammal
info-type="ich"	non-mammals
name="route-of-admin"	
info-type="ich"	oral
info-type="ich"	intravenous
info-type="ich"	intramuscular
info-type="ich"	intraperitoneal
info-type="ich"	subcutaneous
info-type="ich"	inhalation
info-type="ich"	topical
info-type="ich"	other (¹see footnote)
name="duration"	
info-type="us"	short
info-type="us"	medium
info-type="us"	long
name="type-of-control"	
info-type="ich"	placebo
info-type="ich"	no-treatment
info-type="ich"	dose-response-without-placebo

¹ Please consult the regional authorities before using "other".

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Category Element Attributes and Values	values for "category" element content choices
info-type="ich"	active-control-without-placebo
info-type="ich"	external

The following is an example of the use of the study-identifier elements in an STF for a long term carcinogenicity study conducted in mice (species="mouse"):

```
<study-identifier>
    <title>Long term carcinogenicity study</title>
    <ti>study-id>abc123xyz789</study-id>
    <tategory name="species" info-type="ich" >mouse</category>
    <tategory name="duration" info-type="us" >long</category>
</study-identifier>
```

III.STUDY-DOCUMENT AND DOC-CONTENT ELEMENTS

The *study-document* element contains information on the subject matter of each file that is cited as part of the documentation for a study. The *study-document* element includes the *doc-content* element. The *doc-content* element contains the *property* and *file-tag* elements.

A. Property element

The *property* element is appropriate when files might need to be grouped by an applicant provided value. Currently, this element should only be used for site identification within a study. For example, in the submission of case-report-forms, multiple forms originating from the same study site should all be grouped by the study site *property* element.

Property Element Attributes and Values	values for ''property'' element content choices
name="site-identifier"	User identified value for the site of the
info-type="us"	study.

B. File-tag element

The *file-tag* element contains the attributes *name* and *info-type*. The text value of the *file-tag* element's *name* attribute indicates the subject matter of the document. The value of the *file-tag name* attribute should be selected from the values in the table below. For the value of the *info-type* attribute, you should use "ich" if using an ICH value or one of the regional values if the value is not defined in ICH. The table below shows the specified *name* attribute values for the *file-tag* element.

name attribute values for the file-tag element (name=" ")	info- type value	Content of Document	E3 Reference
pre-clinical-study-report	ich	Pre-clinical study report (² see footnote)	
legacy-clinical-study- report	ich	Clinical study report submitted as one file (2see footnote)	
synopsis	ich	Study Report Synopsis	2
study-report-body	ich	Study Report Body	1,3 to 15
protocol-or-amendment	ich	Protocol and/or amendments	16.1.1
sample-case-report-form	ich	Sample CRF	16.1.2
iec-irb-consent-form-list	ich	IEC and IRB and Consent Form Listings	16.1.3
list-description- investigator-site	ich	Description of Investigators and Sites	16.1.4
signatures-investigators	ich	Signatures of principal or coordinating investigator(s) or sponsor's responsible officer	16.1.5
list-patients-with- batches	ich	Listing of patients receiving test drug(s) from specified batch	16.1.6
randomisation-scheme	ich	Randomisation Scheme	16.1.7
audit-certificates-report	ich	Audit Certificates or similar documentation	16.1.8
statistical-methods- interim-analysis-plan	ich	Documentation of statistical methods and interim analysis plans	16.1.9
inter-laboratory- standardisation- methods-quality- assurance	ich	Documentation of Inter-laboratory Standardization Methods and Quality Assurance or similar documentation	16.1.10
publications-based-on- study	ich	Publications Based on the Study	16.1.11
publications-referenced- in-report	ich	Publications Referenced in the Study Report	16.1.12
discontinued-patients	ich	Discontinued Patients Listing	16.2.1
protocol-deviations	ich	Protocol Deviation Listing	16.2.2

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² Refer to *M4: Organisation Document, Granularity Annex* for instructions on how to typically construct study reports.

name attribute values	info-		E3
for the file-tag element	type	Content of Document	Reference
(name='' '')	value		
patients-excluded-from-	ich	Patients Excluded from Efficacy	16.2.3
efficacy-analysis		Analysis Listing	
demographic-data	ich	Demographic Data Listing	16.2.4
compliance-and-drug-	ich	Compliance and/or Drug Concentration	16.2.5
concentration-data		Data Listing	
individual-efficacy-	ich	Individual Efficacy Response Data	16.2.6
response-data		Listing	
adverse-event-listings	ich	File contains Adverse Event Listings	16.2.7
listing-individual-	ich		16.2.8
laboratory-		Individual Laboratory Measurements	
measurements-by-		Listed by Patient	
patient			
case-report-forms	ich	CRF for an individual subject. If you	16.3
		are submitting in the US, you should	
		also provide a "property" element,	
		described below, with its "name"	
		attribute = "site-identifier" and its value	
		the site identification where the study	
		was performed.	
available-on-request	ich	A file listing documents available upon	
		request for a single study. Consult	
		regional guidance for use.	
complete-patient-list	jp	Complete patient list	
serious-adverse-event-	jp	List of patients having serious adverse	
patient-list		events	
adverse-event-patient-	jp	List of patients having adverse events	
list			
abnormal-lab-values-	jp	List of patients having abnormal lab	
patient-list		values	
data-tabulation-dataset	us	Data tabulation dataset	
data-tabulation-data-	us	Data definitions for data tabulation	
definition		datasets	
data-listing-dataset	us	Data listing dataset	
data-listing-data-	us	Data definitions for data listing datasets	
definition			
analysis-dataset	us	Analysis datasets	
analysis-program	us	Program file for analysis dataset	
analysis-data-definition	us	Data definition for analysis datasets	
annotated-crf	us	Annotated CRF for datasets	
ecg	us	Annotated ECG waveform dataset	
image	us	Image files	

name attribute values for the file-tag element (name=" ")	info- type value	Content of Document	E3 Reference
subject-profiles	us	Subject profile. You should also	
		provide a "property" element, described	
		below, with its "name" attribute = "site-	
		identifier" and its value the site	
		identification where the study was	
		performed.	
safety-report	us	IND safety report	
antibacterial	us	Antibacterial microbiology report	
special-pathogen	us	Special pathogens (e.g., fungi,	
		parasites, mycobacteria) and immune	
		modulator microbiology report	
antiviral	us	Antiviral microbiology report	
iss	us	Integrated analysis of safety –	
		integrated summary of safety report	
ise	us	Integrated analysis of efficacy –	
		integrated summary of efficacy report	
pm-description	us	Postmarketing periodic adverse event	
		drug experience report description	

When submitting in the US using a *file-tag* element with the *name* attribute value of "subject-profile" or "case-report-forms", you should include a *property* element with the *name* attribute value "site-identifier" and *info-type* value "us". The content of the *property* element should be text that identifies the site.

IV. LIFECYCLE MANAGEMENT OF THE STUDY TAGGING FILE

When additional leaf elements are to be referenced by a particular STF, the applicant does not need to submit a complete enumeration of the categories, file-tags and leaf ID values for all the files that comprise the Study Report. The subsequent STF would contain only references to the additional leaf elements being included. The *operation* attribute value of the leaf element for the subsequent STF should be "append" and the *modified-file* attribute of that leaf element should reference the most recently submitted STF leaf element for that study in that eCTD element. The study-document information provided in this subsequent STF should only relate to what is being added in the current submission relative to the last submission for the same STF.

For example, when an STF is being submitted in a subsequent sequence to provide additional components (additions, corrections, updates, etc.) to update information in the existing STF (e.g., original STF provided in sequence 0000), the index.xml file of the subsequent sequence would contain the following leaf entry:

```
<le><leaf checksum-type="MD5"
    version="STF version 2.2" xlink:type="simple"
    checksum="421e55366d62fad0e9510f6aed005272" operation="append"
    xlink:href="m4/42-stud-rep/421-pharmacol/4211-prim-pd/stf-jm-12-345.xml"
    modified-file="../0000/index.xml#m12345"
    ID="m42111">
        <ti><title>jm-12-345 Study Tagging File</title>
</leaf>
</m4-2-1-1-primary-pharmacodynamics>
```

V. MODIFYING STF INFORMATION

During the lifecycle of an application, modifications to information contained in the STF might be appropriate as the result of changes to the documentation cited in the STF, changes to the categorization of information cited in the STF, or to correct errors in a previous STF.

These modifications can be grouped as:

- changes to the STF study-identifier information and
- changes to the STF study document information.

A. Changes to the STF Study Identifier Information

When an applicant determines that Study Identifier Information was incomplete or incorrect (for example, a category element value was missing or erroneous in a previously submitted STF), an STF XML file with the corrected category elements should be submitted.

For example, an applicant submits the first STF for a single-dose oral toxicity study (Study No. JM-12-345) in eCTD element 4.2.3.1 in sequence 0001. The index.xml would contain a leaf entry for this file as follows:

```
<leaf checksum-type="MD5"
version="stf version 2.2" xlink:type="simple"
checksum="421e55366d62fad0e9510f6aed005272" operation="new"
xlink:href="m4/42-stud-rep/423-tox/4231-single-dose-tox/stf-jm-12-345.xml"
ID="idm42111-0002">
<title>Study No. JM-12-345 STF</title></leaf>
```

The study-identifier section of this STF contains the following information:

```
<study-identifier>
<title>Single dose oral toxicity study in the mouse and dog</title>
<study-id>jm-12-345</study-id>
```

Clearly, the species identified by the species category tags are incorrect.

To correct this information, the applicant would submit a corrected STF in a subsequent sequence. As there is no mechanism for comparing the information contained in the study-identifier sections of the STFs submitted over time, the information contained in the study-identifier section of the most recent STF will be deemed the most current. This applies to all information contained in the study-identifier section of the STF (title, study-id and category tags).

In order to correct the study-identifier information cited above for Study JM-12-345, an additional STF would be submitted, appended to the most recent STF, containing the corrected information.

The index.xml in this subsequent sequence (0002) would contain a leaf for the new STF as follows:

If there was no additional documentation being provided for this study (and thus the purpose of this STF is solely to correct the erroneous study-identifier information), the STF would contain the following:

Note: "../../" in the path expressions for STF DTD and STF stylesheet depend on the location where the STF instance is stored.

Note: The entire study-identifier block should be resubmitted containing all the category values. The <study-document/> indicates that no additional file-tags are being provided and is technically required since the *study-document* element is a technically mandatory element.

B. Changes to STF Study Document Information

During the lifecycle of an application, modifications to the Study Document Information contained in the STF might be called for as a result of changes to the documentation cited in the STF, changes to the categorization of documents cited in the STF, or to correct errors in a previous STF.

These modifications can be grouped as:

- 1. Adding leaf element references into an existing STF,
- 2. Deleting leaf elements cited in an existing STF, and
- 3. Correcting file-tag values for leaf elements cited by an existing STF.

1. Adding New Files to an Existing STF

To add leaf element references into an existing STF, the applicant should submit a subsequent STF referencing the leaf elements to be added to the existing STF. The index.xml for this sequence would contain a leaf element for the STF and additional leaf elements for any new files being provided in that sequence. The operation attribute value of the leaf element for the STF should be submitted with the 'append' operation and should modify the most recent STF for the study in that eCTD element. The operation attribute value for any additional leaf elements is dependent on the specific life cycle situation for that leaf element and would have an operation attribute value of new, append or replace.

2. Deleting Files Cited by an Existing STF

When a leaf element reference is to be deleted from an STF, a subsequent STF should not be submitted. The index.xml for this sequence should contain a leaf element with an operation attribute of "delete" referencing the leaf element to be deleted. No additional STF file would be called for since the leaf element for the file will be flagged as deleted and is thus effectively removed from the current view of the leaf elements referenced by the STF in that eCTD element.

3. Correcting File-tag Values

When an applicant determines that an incorrect file-tag value has been assigned to a study report component file in the STF, the applicant should "delete" the incorrectly tagged leaf element in the index.xml (to effectively remove the leaf element from any STF referencing it as it would no longer be current) and then reactivate the file in the backbone by including a second leaf with the operation value "new". The file does not need to be resubmitted; the reactivating xlink:href attribute points back to the original location of the file.

Then, an STF referencing this new leaf entry should be submitted with the corrected file tag value.

In the following example the applicant inadvertently tagged the synopsis file as a legacy-clinical-study-report in sequence 0000 and corrects the error in sequence 0003.

In the sequence 0000 index.xml,

```
<leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="421e55366d62fad0e9510f6aed005272" operation="new"
  xlink:href="m4/42-stud-rep/423-tox/4231-single-dose-tox/synopsis-of-jm-12-345.pdf"
  application-version="PDF 1.4"
  ID="m42111">
        <title>jm-12-345 Study Synopsis</title>
</leaf>
<leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="421e55366d62fad0e9510f6aed005272" operation="new"
  xlink:href="m4/42-stud-rep/423-tox/4231-single-dose-tox/stf-jm-12-345.xml"
  version="stf version 2.2"
  ID="m42112">
        <title>Study JM-12-345 STF</title>
</leaf>
In the sequence 0000 stf-jm-12-345.xml file
```

To correct the file-tag error, the following actions would be taken.

In the sequence 0003 index.xml, delete the incorrect file-tag by deleting the leaf element from the index.xml which logically deletes the legacy-clinical-study-report file-tag associated with it in the STF:

```
<leaf operation="delete"
checksum="" checksum-type="MD5"
modified-file="../0000/index.xml#m42111"
ID="idm4211stf">
<title/>
</leaf>
```

Then, resubmit a leaf element for the file with an *operation* attribute value of "new" citing the location of the file in the 0000 sequence - there is no need to send a second copy of the file:

```
<leaf checksum-type="MD5"
    xlink:type="simple"
    checksum="421e55366d62fad0e9510f6aed005272" operation="new"
    xlink:href="../0000/m4/42-stud-rep/423-tox/4231-single-dose-tox/synopsis-of-jm-12-345.pdf"
    application-version="PDF 1.4"
        <title>jm-12-345 Study Synopsis</title>
    ID="r34567">
</leaf></leaf></le>
```

Finally, include another STF (using the "append" operation) and associate the correct synopsis file-tag to the file.

```
<leaf checksum-type="MD5"
    xlink:type="simple"
    checksum="421e55366d62fad0e9510f6aed005272" operation="append"
    xlink:href="m4/42-stud-rep/423-tox/4231-single-dose-tox/stf-jm-12-345.xml"
    modified-file="../0000/index.xml#m42112"
    version="stf version 2.2"    ID="r6789">
        <title>Study JM-12-345 STF</title>
</leaf>
```

In the sequence 0003 STF for JM-12-345, include the study-id tag to identify the study report being modified and include the corrected file-tag metadata:

```
<?xml version="1.0" encoding="UTF-8"?>
<?xml-stylesheet type="text/xsl" href="../../../util/style/ich-stf-stylesheet.xsl"?>
<!DOCTYPE ectd:study SYSTEM "../../../util/dtd/ich-stf-v2-2.dtd">
<ectd:study xmlns:ectd="http://www.ich.org/ectd" xml:lang="en" dtd-version="2.2"</pre>
xmlns:xlink="http://www.w3.org/1999/xlink">
   <study-identifier>
      <title>Single dose oral toxicity study in the mouse and dog</title>
      <study-id>jm-12-345</study-id>
      <category name="species" info-type="ich">mouse</category>
      <category name="species" info-type="ich">dog</category>
      <category name="route-of-admin" info-type="ich">oral</category>
   </study-identifier>
   <study-document>
      <doc-content xlink:href="../../../index.xml#r34567">
      <file-tag name="synopsis" info-type="ich"/>
      </doc-content>
   </study-document>
</ectd:study>
```

VI.STUDY DATA MANAGEMENT OPTIONS

In most situations, one study would generate one STF and the information generated from the study would reside together with the STF in the most appropriate subsection of the CTD. However, there are certain situations where one study could generate more than one STF representation. These situations might exist where:

- different analyses with distinct life-cycle management needs co-exist and should be distinguishable within the same eCTD section of the dossier
- a study generates information that should be presented in a different subsection of the CTD.

A. Distinguishing Time-Specific Analyses Within the Same Subsection of the CTD

In certain instances, the reporting of results can best be managed by maintenance of more than one STF for the same study. This situation generally arises when unique time point analyses (i.e. the latter analysis does not replace the earlier analysis) have their own life-cycle management needs, and thus are better kept as distinct reviewable units.

For example, in studies where patients continue to be followed and reported on (with or without active dosing) beyond the official, protocol-defined, efficacy and/or safety endpoints, the subsequent safety, efficacy or relapse analysis supports a different clinical purpose than the earlier analysis and thus should not replace or append the earlier analysis.

This can be illustrated through consideration of a study with protocol-defined specific time point analyses (perhaps through a Drug Safety Monitoring Board) that are required by each region to be submitted and reviewed to continue the study. Thus, in one sequence, the Applicant provides safety and efficacy data for the subset of patients with 12 weeks of exposure at that point in time. While this information is being reviewed, the Applicant submits patient data from 18 weeks of exposure as well as updates the 12-week database with the additional patients who have achieved that length of exposure. In this instance, it would not be considered appropriate to replace the 12-week data with the 18-week data. These two sets of data should be kept as distinct, reviewable units of information with their own lifecycle management needs.

B. Presenting Information from One Study in a Different Subsection of the CTD

Some studies generate data supporting more than one section of the CTD. A standard mechanism for placing this information in the appropriate CTD sections should be available. For example, a safety and/or efficacy study might also have a 'secondary purpose' to perform a pharmacokinetic evaluation on all or some of the patients in that study.

Filing all of this information (separate sets of analysis and supportive appendices and datasets) under just one section of the dossier is generally considered unsatisfactory, as there would be no method to associate the 'secondary' information to the proper section of the CTD. An approach might be to include the same "all-inclusive" STF in both locations to alert the reviewers that there is information contained in the STF applicable to more than one section of the CTD. However, this creates an additional burden on the reviewer in identifying which datasets, listings and appendices are relevant to the PK assessment and which are relevant to the full safety/efficacy analysis.

Thus, an applicant has the optional ability to organize these different sets of information as discrete units by creating a second STF for the same study. Information that is shared by the two analyses (e.g., protocol, Case Report Form) would be referenced by each STF while information that supports different sections of the dossier could be clearly organized and submitted in the appropriate CTD section. This is especially beneficial to applicants preparing two distinct study reports for the study (one presenting the safety/efficacy analysis on all patients and one presenting the pharmacokinetic analysis on the subset of patients who participated in that part of the study).

Before submitting information of this nature you are advised to consult regional guidance for how best to present this data.

VII. EXAMPLE SCENARIO

This section provides a series of sample sequences related to the same study.

Sequence 0000

An applicant is providing information on a placebo-controlled study in the treatment of nausea titled "Wonderdrug Study S107" performed under their in-house unique identification "S107". In sequence number 0000, the applicant provides interim study results in the form of an interim synopsis, the body of the interim study report and the protocol for the study.

The index.xml for sequence 0000 would contain four leaf entries, one for each content file and one for the STF for the study as follows:

```
<m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-
indication>
  <leaf checksum-type="MD5"
    xlink:type="simple"
    checksum="421e55366d62fad0e9510f6aed005272" operation="new"
    xlink:href="m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/synopsis.pdf"
    application-version="PDF 1.4"
    ID="a101">
```

```
<title>S107 Study Synopsis - Interim Results</title>
 </leaf>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="88e3be3f2d026b572625ab81ef5b068c" operation="new"
  xlink:href=" m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/study-report-body.pdf"
  application-version="PDF 1.4"
  ID="a102">
        <title>S107 Study Report Body - Interim Results</title>
 </leaf>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="98723f7594b5500a861509547c384e46" operation="new"
  xlink:href=" m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/protocol.pdf"
  application-version="PDF 1.4"
  ID="a103">
        <title>S107 Study Protocol</title>
 </leaf>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="25d3b246313a9dbf688a48da2295260e" operation="new"
  xlink:href=" m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/stf-s107.xml"
  version="stf version 2.2"
  ID="a104">
        <title>Study Tagging File for S107</title>
 </leaf>
</m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-
indication>
```

The STF provided in sequence 0000 is named "stf-s107.xml" and contains the following information about the documentation being provided for study S107:

Note: "../../../" in the path expressions for STF DTD and STF stylesheet depend on the location where the STF instance is stored.

Note: The type of control for this study was intentionally cited as "no-treatment" even though the study is a placebo-controlled study. This will be corrected in a subsequent submission (see sequence 0002).

Sequence 0001

In a subsequent submission, the sponsor wishes to provide additional documentation on Study S107. In sequence 0001, the Sponsor provides the Sample Case Report Form and a protocol amendment.

The index.xml for sequence 0001 would contain three leaf entries, one for each content file (i.e., the protocol amendment and the Sample CRF) and one for the STF which updates the previously submitted STF as shown here:

```
<m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-
indication>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="421e55366d62fad0e9510f6aed005272" operation="new"
  xlink:href="m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/protamend01.pdf"
  application-version="PDF 1.4"
  ID="a567">
        <title>$107 Protocol Amendment No. 1</title>
 </leaf>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="88e3be3f2d026b572625ab81ef5b068c" operation="new"
  xlink:href=" m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/samplecrf.pdf"
  application-version="PDF 1.4"
  ID="a568">
        <title>S107 Sample Case Report Form</title>
 </leaf>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="25d3b246313a9dbf688a48da2295260e" operation="append"
```

```
xlink:href=" m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-contr/study-s107/stf-s107.xml"
    modified-file="../0000/index.xml#a104"
    version="stf version 2.2"
    ID="a569">
        <title>Study Tagging File for S107</title>
    </leaf>
</m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication>
```

The new STF is also named "stf-s107.xml" and summarizes only the new information being provided in this submission as follows:

```
<?xml version="1.0" encoding="UTF-8"?>
<?xml-stylesheet type="text/xsl" href="../../../util/style/ich-stf-stylesheet.xsl"?>
<!DOCTYPE ectd:study SYSTEM "../../../util/dtd/ich-stf-v2-2.dtd">
<ectd:study xmlns:ectd="http://www.ich.org/ectd" xml:lang="en" dtd-version="2.2"</pre>
xmlns:xlink="http://www.w3.org/1999/xlink">
   <study-identifier>
      <title>Wonderdrug Study S107</title>
      <study-id>S107</study-id>
      <category name="type-of-control" info-type="ich">no-treatment</category>
   </study-identifier>
   <study-document>
      <doc-content xlink:href="../../../index.xml#a567">
         <file-tag name="protocol-or-amendment" info-type="ich"/>
      </doc-content>
      <doc-content xlink:href="../../../index.xml#a568">
         <file-tag name="sample-case-report-form" info-type="ich"/>
      </doc-content>
   </study-document>
</ectd:study>
```

Note: The type of control for this study was intentionally cited as "no-treatment" even though the study is a placebo-controlled study. This will be corrected in a subsequent submission (see sequence 0002).

Note: "../../../" in the path expressions for STF DTD and STF stylesheet depend on the location where the STF instance is stored.

Sequence 0002

In a subsequent submission, the sponsor wishes to provide additional documentation on Study S107. In sequence 0002, the Sponsor provides the final study report and synopsis plus CRF files for two patients who died during the conduct of the study. In addition, it was finally noticed that the previous STFs had incorrectly identified the study as an uncontrolled study when, in fact, it was placebo-controlled.

The index.xml for sequence 0002 would contain five leaf entries, one for each content file (i.e., synopsis, study report and two patient CRF files) and one for the STF which would append the most recent STF as shown here:

```
<m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-
indication>
 <leaf checksum-type="MD5"
  xlink:tvpe="simple"
  checksum="421e55366d62fad0e9510f6aed005272" operation="replace"
  xlink:href="m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/synopsis.pdf"
modified-file="../0000/index.xml#a101"
  application-version="PDF 1.4"
  ID="r345">
        <title>S107 Study Synopsis - Final</title>
 </leaf>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="88e3be3f2d026b572625ab81ef5b068c" operation="replace"
  xlink:href=" m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/s107body.pdf"
modified-file="../0000/index.xml#a102"
   application-version="PDF 1.4"
  ID="r346">
        <title>S107 Study Report - Final</title>
 </leaf>
<leaf checksum-type="MD5"
  xlink:tvpe="simple"
  checksum="421e55366d62fad0e9510f6aed005272" operation="new"
  xlink:href="m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/crf/11/12.pdf"
  application-version="PDF 1.4"
  ID="r347">
        <title>CRF for Subject S107-11-12</title>
 </leaf>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="88e3be3f2d026b572625ab81ef5b068c" operation="new"
  xlink:href=" m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/crf/162/5045.pdf"
  application-version="PDF 1.4"
  ID="r348">
        <title>CRF for Patient S107-162-5045</title>
 </leaf>
 <leaf checksum-type="MD5"
  xlink:type="simple"
  checksum="25d3b246313a9dbf688a48da2295260e" operation="append"
  xlink:href=" m5/53-clin-stud-rep/535-rep-effic-safety-stud/nausea/5351-stud-rep-
contr/study-s107/stf-s107.xml"
  modified-file="../0001/index.xml#a569"
```

The new STF is named "stf-s107.xml" and identifies the additional documentation provided for Study S107 in this submission. The information in this STF also corrects the erroneous "type-of-control" category tag to "placebo" as follows:

```
<?xml version="1.0" encoding="UTF-8"?>
<?xml-stylesheet type="text/xsl" href="../../../util/style/ich-stf-stylesheet.xsl"?>
<!DOCTYPE ectd:study SYSTEM "../../../util/dtd/ich-stf-v2-2.dtd">
<ectd:study xmlns:ectd="http://www.ich.org/ectd" xml:lang="en" dtd-version="2.2"</pre>
xmlns:xlink="http://www.w3.org/1999/xlink">
  <study-identifier>
     <title>Wonderdrug Study S107</title>
     <study-id>S107</study-id>
     <category name="type-of-control" info-type="ich">placebo</category>
  </study-identifier>
   <study-document>
     <doc-content xlink:href="../../../index.xml#r345">
        <file-tag name="synopsis" info-type="ich"/>
     </doc-content>
     <doc-content xlink:href="../../../index.xml#r346">
        <file-tag name="study-report-body" info-type="ich"/>
     </doc-content>
     <doc-content xlink:href="../../../index.xml#r347" >
        coperty name="site-identifier" info-type="us">11/property>
        <file-tag name="case-report-forms" info-type="ich"/>
     </doc-content>
     <doc-content xlink:href="../../../index.xml#r348" >
        <file-tag name="case-report-forms" info-type="ich"/>
     </doc-content>
  </study-document>
</ectd:study>
```

Note: "../../../" in the path expressions for STF DTD and STF stylesheet depend on the location where the STF instance is stored.

FDA PORTABLE DOCUMENT FORMAT (PDF) SPECIFICATIONS

Revision History

Date	Summary of Changes	Version
2005-04-08	Initial version	1.0
2008-06-04	Changed "Bookmarks and Page"	2.0
	to "Bookmarks Panel and Page"	
	in Open Dialog Box section	
2011-12-20	Updated to align with ICH	3.0
	recommendation on PDF version	
	1.7; add "Purpose" section; clarify	
	specifications related to security,	
	usability, and promotional	
	materials; revise list of standard	
	fonts; add PDF optimization; and	
	incorporate editorial changes	
2012-1-20	Clarified language on acceptable	3.1
	PDF versions for documents;	
	added page numbers	

Version 3.1

FDA PORTABLE DOCUMENT FORMAT (PDF) SPECIFICATIONS

PURPOSE

These specifications are for submitting documents in Portable Document Format (PDF). The purpose of this document is to provide specifications for submitting PDF files that align with the ICH M2 recommendations and that are in a format that the receiving Center currently supports. For purposes of this document, "supports" means the receiving Center has established processes and technology infrastructure to support the receipt, processing, review, and archive of files in the specified standard format. PDF is an open, published format created by Adobe Systems Incorporated (http://www.adobe.com). Software from a variety of sources can be used to create files in the PDF format.

VERSION

PDF versions 1.4 through 1.7 are acceptable. Submitted PDF files should be readable by Adobe Acrobat 8.0, should not require additional software or plug-ins to be read and navigated, and should be text searchable. If plug-ins are used during the creation of a PDF document, prior to submitting the document, ensure that a plug-in is not needed for review or archive.

SECURITY

Do not activate security settings or password protection. The integrity of the submitted files is maintained through Agency security and archival processes. A copy of the files, generated from the submitted files, will be provided to the reviewer. The reviewer should be able to print, select text and graphics, and make changes to text, notes and form fields using the provided copy.

FDA Forms downloaded from the FDA Forms website contain security settings that prevent changing the documents. These forms should be submitted as provided, with no additional security added and without removing the provided security settings.

FONTS

Embed all fonts. PDF viewing software automatically substitutes a font to display text if the font used to create the text is unavailable on the reviewer's computer. In some cases, font substitution can occur even when the fonts are available. For example, Helvetica or Times are substituted even if available on the reviewer's computer. Font substitution can affect a document's appearance and structure, and in some cases it can affect the information conveyed by a document. Font availability to the reviewer is ensured if all fonts are embedded. When fonts are embedded, all characters for the font should be included not just a subset of the fonts being used in the document. Inspect documents to make sure all fonts are fully embedded prior to submission.

Font embedding does not always solve the problems that occur when a reviewer tries to copy and paste text from a PDF document into another software format. If the font is not available on the reviewer's computer, font substitution results, even if the fonts are embedded. This problem is avoided if the fonts are restricted to those listed in Table 1.

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¹ ICH has adopted the use of ISO 32000-1 without extensions and with the following restrictions – PDF files must not contain: JavaScript; dynamic content which can include audio, video or special effects and animations; attachments; or 3D content. See http://estri.ich.org/recommendations/PDF V2 0.pdf

Table 1: List of Standard Fonts

Font type	Font name
Sans Serif	Arial
	Arial Italic
	Arial Bold
	Arial Bold Italic
Non Proportional	Courier New
	Courier New Italic
	Courier New Bold
	Courier New Bold Italic
Serif	Times New Roman
	Times New Roman Italic
	Times New Roman Bold
	Times New Roman Bold Italic
Other	Symbol
	Zapf Dingbats

Use font sizes ranging from 9 to 12 point. Times New Roman 12-point font is recommended for narrative text. When choosing a point size for tables, a balance should be made between providing sufficient information on a single page that may facilitate data comparisons while still achieving a point size that remains legible. Generally, point sizes 9-10 are recommended for tables; smaller point sizes should be avoided. Ten point fonts are recommended for footnotes.

Black is the recommended font color except that blue can be used for hypertext links. Light colors do not print well on grayscale printers. Any colors used should be tested prior to submission by printing sample pages from the document using a grayscale printer.

PAGE ORIENTATION

Save the page orientation for proper viewing and printing within the document. Proper page orientation eliminates the need for reviewers to rotate pages. For example, setting page orientation of landscape pages to landscape prior to saving the PDF document in final form ensures a correct page presentation.

PAGE SIZE AND MARGINS

Set up the print area for pages to fit on a sheet of paper that is 8.5 inches by 11 inches. A margin of at least 3/4 of an inch on the left side of page avoids obscuring information when pages are subsequently printed and bound. Setting the margin for at least 3/8 of an inch on the other sides is sufficient. For pages in landscape orientation, a margin of 3/4 of an inch at the top allows more information to be displayed legibly on the page. Header and footer information should not invade the specified margins (i.e., header and footer information should not appear within 3/8 of an inch of the edge of the 8.5 by 11 inch page), so the text will not be lost upon printing or being bound. These margins allow printing on A4 as well. Oversized documents (e.g., CAD drawings or other specialized documents) and promotional materials submitted in PDF format should be created according to their actual page size.

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SOURCE OF ELECTRONIC DOCUMENTS

Avoid image-based PDF files whenever possible. PDF documents produced by scanning paper documents usually have poorer image resolution than PDF documents produced from electronic source documents such as word processing files. Scanned documents are generally more difficult to read and do not allow the reviewer to search or copy and paste text for editing in other documents. If scanned files must be submitted, they should be made text searchable where possible. If optical character recognition software is used, verify that imaged text is converted completely and accurately.

METHODS FOR CREATING PDF DOCUMENTS AND IMAGES

Use the dpi settings in Table 2 for scanning documents. Scanned documents scanned at a resolution of 300 dots per inch (dpi) ensure that the pages of the document are legible both on the computer screen and when printed and, at the same time, minimizes the file size. The use of grayscale and color significantly increases the file size and should be used only when these features improve the reviewability of the material. After scanning, avoid resampling to a lower resolution. A captured image should not be subjected to non-uniform scaling (i.e., sizing). See the following table for resolutions for various images.

Table 2: Scanning Resolution

Document type	Resolution
Handwritten notes	300 dpi (black ink)
Plotter output graphics	300 dpi
Photographs – black and white	600 dpi (8 bit gray scale)
Photographs – color	600 dpi (24 bit RGB)
Gels and karyotypes	600 dpi (8 bit grayscale depth)
High pressure liquid chromatography	300 dpi

IMAGE COMPRESSION TO REDUCE FILE SIZE

Compress files using either Zip/Flate or CCITT Group 4. File compression is a method for reducing file size. Some methods of compression can result in loss of data and can introduce compression artifacts that affect the reviewability of the information. The following two methods provide lossless compression.

- Zip/Flate (one technique with two names) for lossless compression of color and grayscale images is specified in Internet RFC 1950 and RFC 1951.
- CCITT Group 4 Fax compression technique recommendations for lossless compression of black and white images is specified in T.6 (1988) Facsimile coding schemes and coding control functions for Group 4 facsimile apparatus.

OPTIMIZE FOR FAST WEB VIEW

Create files from source documents using the "Optimize the PDF for fast web view" option to reduce file sizes and file opening times.

IMAGE COLOR MATCHING

Because color varies from monitor to monitor, it is difficult to ensure that the reviewer will see exactly the same color as in the actual image. However, for printing, there is more control over the color by using CMYK (Cyan, Magenta, Yellow, Black) color model as opposed to the RGB model. Pantone Matching

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using the color profile provided by CMYK ensure color consistency for printing. The International Color Consortium (ICC)² color profile specification is used when PDF documents are printed.

USE OF THUMBNAILS

PDF documents do not need embedded thumbnails.

HYPERTEXT LINKING AND BOOKMARKS IN TEXT AND TABLE OF CONTENTS

Hypertext links and bookmarks improve navigation through PDF documents. Use hypertext links throughout the body of the document to link to supporting annotations, related sections, references, appendices, tables, or figures that are not located on the same page as the narrative text. Hypertext links in text can be designated by rectangles using thin lines or by blue text. A consistent method of designating links in a document avoids confusion. Using relative paths when creating hypertext links minimizes the loss of hyperlink functionality when submissions are loaded onto network servers. Both absolute links that reference specific drives and links to root directories do not work once the submission is loaded.

The document table of contents helps the reviewer navigate to the information of interest within the document that is not provided in the submission table of contents. For documents with a table of contents, provide bookmarks and hypertext links for each item listed in the table of contents including all tables, figures, publications, other references, and appendices that are essential for navigation through documents. The use of invisible rectangles and blue text in the table of contents for hypertext links avoids obscuring text. Other help for navigation includes a bookmark hierarchy identical to the table of contents; up to 4 levels deep in the hierarchy.

When creating bookmarks and hyperlinks, set the magnification setting to "Inherit Zoom" so the destination page displays at the same magnification level that the reviewer is using for the rest of the document.

INITIAL VIEW SETTINGS

Set the Navigation Tab to open to "Bookmarks Panel and Page." This sets the initial document view when the file is opened. If there are no bookmarks, set the Navigation Tab to "Page Only." Page Layout and Magnification should be set to "Default."

PAGE NUMBERING

In general, it is easier to navigate through an electronic document if the page numbers for the document and the PDF file are the same, with the initial page of the document numbered as page one. There is an exception when a document is split because of its size (e.g., > 100 MB) and the second or subsequent file is numbered consecutively to that of the first or preceding file.

NAMING PDF FILES

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² <u>http://www.color.org/</u>

SPECIAL CONSIDERATIONS FOR PROMOTIONAL MATERIAL

Promotional materials submitted in PDF format may need special consideration to ensure accurate representation of the actual image. Since color varies from monitor to monitor, it is difficult to ensure that the reviewer will see exactly the same color as in the actual image. Provide images at the highest resolution and depth practical. For photographs, the image should be obtained with a resolution of at least 600 dpi. Documents that are available only in paper should be scanned at resolutions that will ensure the pages are legible both on the computer monitor and when printed; at least 600 dpi is recommended. Promotional material should be submitted according to its actual size when practical. When an image size is altered, the original dimensions must be stated. Images of three-dimensional promotional pieces must show all sides and components.

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