KEMENTERIAN KESIHATAN MALAYSIA
(Ministry of Health Malaysia)
Bahagian Regulatori Farmasi Negara (NPRA)
Lot 36, Jalan Universiti
46200 Petaling Jaya
Selangor
MALAYSIA

No. Telefon : 03-7883 5400
No. Faksimili : 03-7956 2924
Portal Rasmi : http://www.npra.moh.gov.my
E-mel Rasmi : npra@npra.gov.my

Ruj. Kami : (7) dlm.BPFK/PPP/01/03 Jld.4

Tarikh : 05 MAR 2020

SEMUA PEMEGANG PENDAFTARAN

SEMUA PERSATUAN BERKENAAN
(SEPERTI DI SENARAI EDARAN)

Tuan/Puan,

MAKLUMAN BERKAITAN PELAKSANAAN:
***GUIDANCE DOCUMENT FOR PRE-SUBMISSION MEETING* (PSM)**

Adalah saya merujuk perkara di atas.

2. Pihak Berkuasa Kawalan Dadah (PBKD) dalam mesyuaratnya kali ke **343** pada **13 Februari 2020** mengambil maklum dan bersetuju dengan garispanduan *Guidance Document for Pre-Submission Meeting* (PSM) seperti di Lampiran A.

3. PSM merupakan perkhidmatan baharu yang disediakan oleh Bahagian Regulatori Farmasi Negara (NPRA) yang lebih teratur dan berpusat (*centralised*) yang merupakan satu platform untuk pemegang pendaftaran produk bertanyakan soalan dan mendapatkan penjelasan bagi isu kualiti, keselamatan dan efikasi produk semasa peringkat pembangunan produk.

4. Buat masa ini, skop PSM fokus kepada kategori-kategori produk berikut:
   i. produk ubat baru;
   ii. produk biologik (termasuk produk biosimilar);
   iii. produk semulajadi dengan tuntutan terapeutik;
   iv. produk suplemen kesihatan dengan tuntutan *disease risk reduction*.

Isu-isu berkaitan dengan permohonan lesen pengilang atau pensijilan *Good Manufacturing Practice* (GMP) tidak termasuk dalam skop PSM.

5. Di awal perlaksanaan perkhidmatan PSM, jumlah bilangan mesyuarat akan dihadkan kepada **satu sesi untuk sebulan,** maksimum 2 sesi PSM bagi setiap

produk. NPRA boleh menolak mana-mana permohonan sekiranya isu berkaitan boleh diselesaikan dengan alternatif lain seperti emel dan telefon.

6. Pemegang pendaftaran produk yang berminat untuk mendapatkan perkhidmatan PSM boleh merujuk kepada prosedur dalam garispanduan *Guidance Document for Pre-Submission Meeting* (PSM) untuk maklumat lanjut.

7. Perkhidmatan yang akan ditawarkan ini adalah tidak mandatori dan dibuka secara pilihan kepada pemohon. Walau bagaimanapun, sebarang nasihat yang diberikan oleh NPRA semasa PSM adalah tidak terikat (*non-binding*), dengan mengambil kira perkembangan regulatori yang mungkin berubah dari semasa ke semasa.

8. Tarikh perlaksanaan perkhidmatan ini mulai **15 Mac 2020.**

9. Pihak pemegang pendaftaran dinasihatkan agar mengambil maklum mengenai perkara di atas.

Sekian, terima kasih.

"BERKHIDMAT UNTUK NEGARA"

Saya yang menjalankan amanah,

(DATIN DR. FARIDAH ARYANI BINTI MD YUSOF) RPh.1197
Pengarah
Bahagian Regulatori Farmasi Negara
Kementerian Kesihatan Malaysia

NB/AAG/PKPSR/NPRA/14022020

✉ azizahag@npra.gov.my / nurhidayah@npra.gov.my
+603 - 7883 5463/5474
+603 – 7958 2960

s.k. 1. Pengarah Kanan Perkhidmatan Farmasi
Kementerian Kesihatan Malaysia.

2. Pengarah
Bahagian Penguatkuasa Farmasi
Kementerian Kesihatan Malaysia.

3. Pengarah
Bahagian Amalan dan Perkembangan Farmasi
Kementerian Kesihatan Malaysia

LAMPIRAN A

GUIDANCE DOCUMENT FOR PRE-SUBMISSION MEETING (PSM)

NATIONAL PHARMACEUTICAL REGULATORY DIVISION (NPRA)

First Edition – February 2020

National Pharmaceutical Regulatory Division
Ministry of Health Malaysia

Table of Contents

1 Introduction

1.1 What is a Pre-submission Meeting (PSM)?

A PSM is a service offered by National Pharmaceutical Regulatory Agency (NPRA), Ministry of Health (MOH), Malaysia, which provides regulatory advice (with regards to quality, safety and efficacy aspects) to applicants prior to the submission of an application to register a product. PSM, unlike a regular appointment or discussion between the applicant and NPRA officers, entails a formal meeting for applicants to request feedback from NPRA during developmental stages of a product.

The data required to prepare a dossier for submission is complex and attention to the details of requirements is important to ensure a smooth assessment process. Hence, the primary purpose of PSM is to resolve or clarify technical issues relating to **new chemical entities, biologics (including biosimilars), natural products with therapeutic claims and health supplement products with disease-risk reduction claims** that cannot be addressed easily by other means, such as reading guidelines or exchanging emails. A PSM serves as a platform for applicants to:

- Introduce and discuss the candidate product
- Raise questions and gain valuable feedback
- Address any specific issues to the intended dossier prior to submission
- Identify any critical issues during product development before submitting an application
- Identify the additional supporting documentations needed for an application
- Clarify any issues relating to existing studies or the proposed data package

Although PSM is not mandatory, applicants may request for a PSM if deemed necessary. NPRA may reject a request for a PSM, if the issues presented may be more effectively resolved by other alternatives (e.g. email or phone call).

Our advice at the meeting is nonbinding and is given without prejudice.

As knowledge evolves over time, the advice we gave at the meeting may become out of date or be superseded with time.

1.2 Scope of PSM

The scope of PSM includes **new chemical entities, biologics (including biosimilars), natural products with therapeutic claims and health supplement products with disease-risk reduction claims during developmental stages of a product.**

Scientific advice on quality, safety and efficacy aspects may be given on interpretation and implementation of existing guidelines (local and international). Scientific issues that will be covered include but are not limited to:

- Quality aspects (e.g. manufacturing, stability, analytical testing and validation, process validation)
- Pre-clinical development (e.g. Organisation for Economic Co-operation and Development (OECD) Good Laboratory Practice (GLP) requirements)
- Clinical development (e.g. Good Clinical Practice (GCP) requirements, First in Human/ Pharmacokinetics/ Pharmacodynamics study requirements, efficacy and safety endpoints, trial design, trial duration, target population, comparator, study design, toxicology, pharmacology, safety and efficacy)

Please note:

- PSM is **not** a product preview. PSM is **not** intended to evaluate a registration application in advance. PSM is a platform for the applicant to ask questions or to seek clarification from NPRA on issues related to the quality, safety and efficacy aspects of a product, prior to registration application.
- PSM does **not** apply to applications for a manufacturing license or Good Manufacturing Practice (GMP) certification, clearance or technical consultation.
- No PSM is allowed once a registration application has been submitted.

The primary focus of a PSM shall be on product development. NPRA does **not** provide:

- Pre-evaluation of data to support an application for product registration.
- Advice on developing a statistical analysis plan or the number of studies required to support

1.3 Alternatives to PSM

If NPRA deems that a PSM is not necessary, you may be able to resolve the issues more effectively by:

- Viewing the NPRA website (www.npra.gov.my) and Drug Registration Guidance Document (DRGD) for regulatory information
- Telecommunication or email

1.4 Who may attend the meeting

The list of attendees may include but is not limited to:

- Product applicant
- Product owner
- Manufacturer of finished product/ Active Pharmaceutical Ingredient (API)/ Drug Substance (DS)
- Parties involved in the product development and clinical trials
- NPRA officers

2 Before the meeting

2.1 Request a meeting using the PSM request form

- The applicant must complete the PSM request form, which is available for download on www.npra.gov.my.
- The applicant must be a locally incorporated company, corporate or legal entity, with permanent address and registered with Companies Commission of Malaysia (with the scope of business related to the health/ pharmaceutical product).
- No PSM is allowed once a registration application has been submitted.
- The complete PSM request form must be emailed at least **8 weeks** before the proposed meeting date to presubmission@npra.gov.my.
- Please submit the following documents along with the PSM request form:
  a. Meeting agenda:
     - Include estimated time required for the presentation and the designated speaker(s)
  b. Brief statement of purpose(s) and objective(s) of the meeting
  c. List of proposed question(s) (organised per ACTD):
     - Include a brief explanation on the context and purpose of each question

2.2 Screening of the application for PSM

- NPRA will screen the PSM request form. NPRA will notify the applicant on the decision to hold meeting within 2 weeks from the date of PSM request submission form. If the administrative or content requirements for holding a PSM are fulfilled, NPRA will inform the applicant of the meeting date through email.
- If the issues presented may be more effectively resolved by other alternatives, NPRA may reject a PSM request and applicant will be notified by email.
- Once the meeting date has been confirmed, applicant must submit the complete PSM package **2 weeks** before the date of the PSM to presubmission@npra.gov.my.
- If the size of attachment is more than 5MB, applicant may send the information in CD together with a cover letter to the following address:

  Industry Development and Communication Section (One-Stop Centre)
  National Pharmaceutical Regulatory Agency (NPRA),
  Lot 36, Jalan Universiti,
  46200 Petaling Jaya, Selangor.

2.3 Contents of a PSM package

The PSM package should provide information relevant to the discussion topics. It is critical to include sufficient information to enable the following:

- NPRA arranges internal staff with the relevant expertise to participate in the meeting
- Everyone attains a productive discussion or exchange of information

Please include the following **mandatory** documents in the PSM package:

a. Product information (e.g. Product name, strength, dosage form, proposed indication(s), manufacturing process etc.)
b. API/ DS information (e.g. Chemical name, structure, manufacturing process, type of API/DS submission etc.)
c. Existing treatment for the disease (worldwide and in Malaysia):
   - Include a brief background of the disease
d. Existing treatments and expected benefits of the product
e. Product development status in other countries:
   - Include any relevant regulatory history (submission, approval, rejection, etc.)
f. Meeting presentation with full set of slides including the references, scheduled to be presented at the meeting
g. List of attendees, with titles and affiliations:
   - Include a list of individuals, including titles and affiliations, from the applicant's organisation who will attend the proposed meeting

Additionally, please include the following documents **if relevant** to the discussion:

h. Pre-submission meeting (PSM) notes (if PSM has been held before)
i. Supplementary information relevant to the objectives of the meeting (highlight any questions that you have)
j. Overview of the product and summary of its clinical development programme:
   - Completed and planned studies
   - Draft of clinical trial protocol
   - Results of relevant clinical trials
   - Any development plan that deviates from current guidelines or practices

Although applicant should not provide detailed documentation of trial designs or completed studies and clinical trials, sufficient information should be provided to facilitate understanding of the issues, such as a small table that summarises major results.

k. Other relevant quality, efficacy and safety information for the product.

Please note:

- Upon submission, the PSM package is considered finalised and amendments are not allowed unless advised by NPRA
- NPRA reserves the right to request for additional documents, when necessary
- Please do not include the following:
  - Detailed data or full study and trial reports
  - Promotional material for the company or the product

2.4 Organise the PSM package

The PSM package must be organised as follows:

- Number the pages sequentially (individual sections can be numbered separately)
- Include a table of contents, appendices, and cross-references, if necessary

3 PSM arrangement

- A face-to-face meeting is preferable. However, teleconference may be considered upon request if deemed appropriate.
- The applicant will generally be allocated a maximum of **2 hours** for the meeting, unless agreed otherwise by NPRA.

4 Structure of the meeting

- Meetings will be coordinated by an NPRA staff member and will begin with introductions and an overview of the agenda.
- It is important to note that:
  - the purpose of the meeting is to discuss pre-agreed issues only
  - the meeting is not to promote the product or company history
  - the meeting is not to be audio or video recorded in any capacity
- Advice given at PSM :
  - has no bearing on the eventual outcome of the application concerned
  - **is not legally binding** in regard to any future registration application, either on the part of NPRA or the applicant
  - is given based on the question and documentation provided by the applicant in the light of the current scientific knowledge and without prejudice to evolution of regulatory requirements and scientific developments

5 After the meeting

- The applicant will:
  - complete the PSM notes form, which is available for download on www.npra.gov.my, which provides a summary that clarifies the agreed outcomes, and any actions arising. This information does not have to be in great detail. The PSM notes form is not intended to represent a transcript of the meeting.

- email a copy of the PSM notes form to presubmission@npra.gov.my within **1 week** from the date of PSM for verification by NPRA.

- Upon verification, NPRA will distribute the PSM notes to all participants of the meeting.
- NPRA reserves the right to change or modify the PSM notes for finalisation without prior notice.
- Any correspondence on follow up and action items will be conducted via email with the relevant NPRA officers.

6 Limitations on number of PSM requests and PSMs

- There will be a limitation on the total number of PSM requests that NPRA will screen and the number of PSMs to be held per month
- Each applicant is limited to one meeting per request. If subsequent meeting is deemed necessary, a new request shall be submitted.
- A maximum of **two** meetings is allowed for each product prior to product registration submission. Additional meeting(s), if deemed necessary, will be considered on a case-by-case basis.

7 Fees

Fees to be imposed for PSM will be informed once decided.

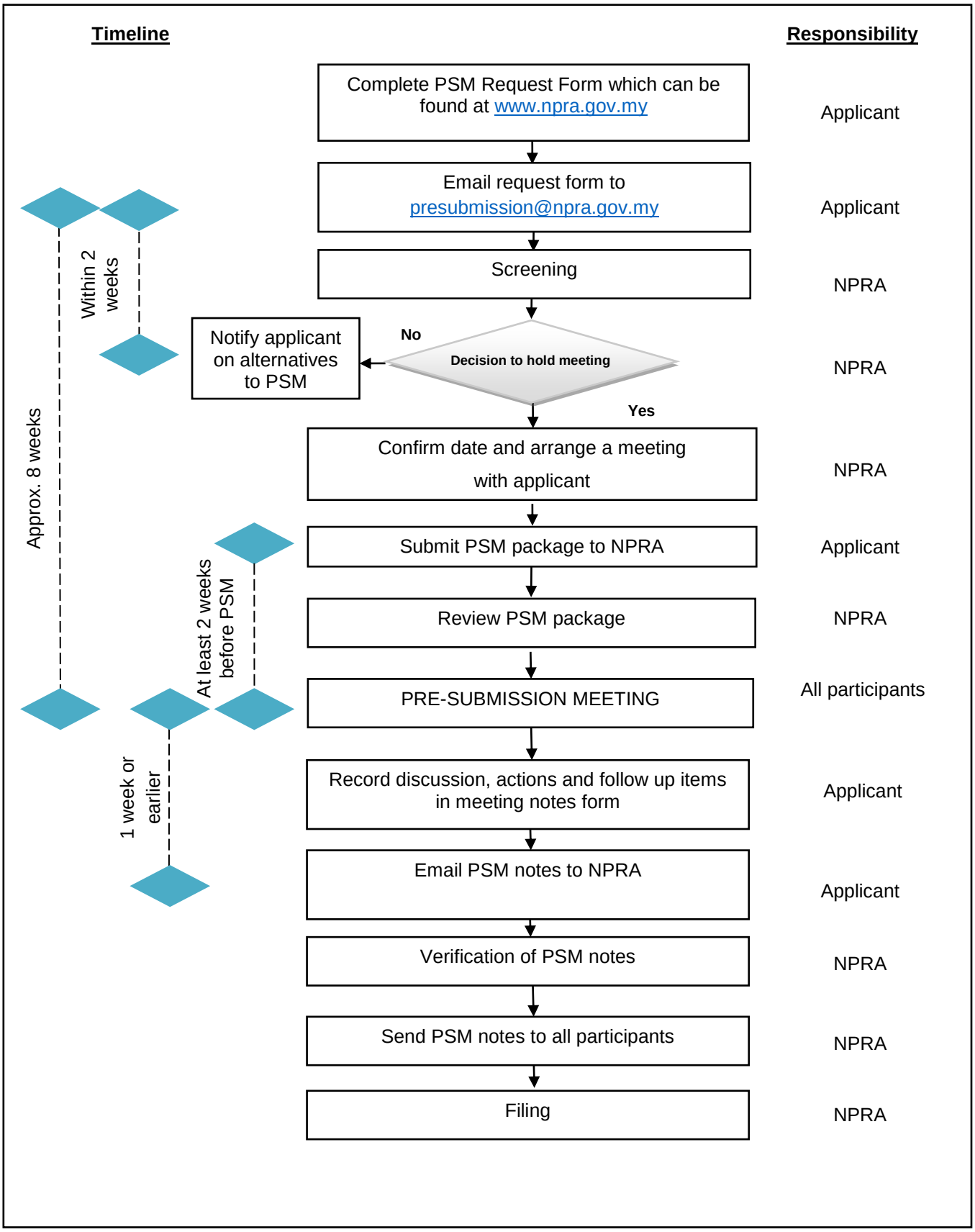
8 References

Some contents in this document have been extracted from the following references:

i. Guidance Document: The Management of Drug Submissions and Applications (Health Canada, January 2018)
ii. Guidance for Applicants for the Early Access to Medicines Scheme (EAMS) (Step II) (Medicine and Healthcare Products Regulatory Agency (MHRA), April 2014)
iii. HD-Guidance Document Meetings for Applicants Held with the Authorisation Sector (Swissmedic, May 2017)
iv. Pre-Submission Meetings with TGA (Therapeutic Goods Administration (TGA), March 2018)
v. Scientific Advice and Protocol Assistance Meeting Requests at Afssaps (Agence française de sécurité sanitairedes produits de santé (Afssaps), September 2006)
vi. European Medicines Agency Guidance for Applicants Seeking Scientific Advice and Protocol Assistance (European Medicines Agency (EMA), June 2017)

9 Appendix

9.1 PSM Process Flow



9.2 Pre-submission Meeting (PSM) Request Form

NPRA use only

National Pharmaceutical Regulatory Division (NPRA)
Ministry of Health Malaysia
Lot 36, Jalan Universiti (Jalan Profesor Diraja Ungku Aziz), 46200 Petaling Jaya, Selangor
Tel. No.: 03-78835400 Fax No.: 03-79562924
Email: presubmission@npra.gov.my Website: https://www.npra.gov.my

PRE-SUBMISSION MEETING (PSM) REQUEST FORM

Please read the instructions below and refer to **GUIDANCE DOCUMENT FOR PRE-SUBMISSION MEETING.**

Please complete each section of this application form and email to presubmission@npra.gov.my at least **8 weeks** before the proposed meeting date.

Our advice at the meeting is nonbinding and is given without prejudice. As knowledge evolves over time, the advice we gave at the meeting may become out of date or be superseded with time.

1. Applicant

Company	
Address	

2. Contact person

Name	
Designation	
Address	
Phone	
Email	

3. Proposed scheduling information

Proposed date	**approximately 8 weeks following the receipt of a complete PSM request form*
Proposed time	
Proposed meeting length	** 2 hours maximum, unless agreed otherwise by NPRA*

4. Subject matter for discussion (Please tick (√))

- Product category:

  - New Chemical Entity
  - Biologics (including biosimilars)
  - Natural product with therapeutic claims
  - Health supplement product with disease-risk reduction claims

- Issues to be discussed:

  - Quality aspects (e.g. manufacturing, stability, analytical testing and validation, process validation)
  - Pre-clinical development (e.g. Organisation for Economic Co-operation and Development (OECD) Good Laboratory Practice (GLP) requirements)
  - Clinical development (e.g. Good Clinical Practice (GCP) requirements, First in Human/ Pharmacokinetics/ Pharmacodynamics study requirements, efficacy and safety endpoints, trial design, trial duration, target population, comparator, study design, toxicology, pharmacology, safety and efficacy)
  - Others (please specify)
    _____

5. Product Information

Product name and strength(s)	
Dosage form(s)	
Active Ingredient(s)	
Product Manufacturer (Name and address)	

API/DS Manufacturer(s) (Name and address)	
Indication(s)	
Other relevant information	

6. Supporting Documents

Please submit the following documents along with the PSM request form:

No.	Contents	Applicant *(Please tick √)*	*For office use only (NPRA)* *(Please tick √)*
1.	Meeting agenda: - Include estimated time required for the presentation and the designated speaker(s)		
2.	Brief statement of purpose(s) and objective(s) of the meeting		
3.	List of proposed question(s) (grouped by discipline): - Include a brief explanation of the context and purpose of each question		

*Notes:

1. The complete PSM request form can be emailed to presubmission@npra.gov.my.
2. NPRA reserves the right to request for additional documents, when necessary.
3. Following confirmation of the meeting date by NPRA, the complete PSM Package is to be provided **2 weeks** prior to the scheduled meeting (please refer to PSM Package Checklist).

DECLARATION:

I declare that I am aware, in the case that PSM is granted, I am required to prepare PSM notes and submit to NPRA within one week after the PSM date.

Name			
Signature		Date	

***For NPRA internal use only**

Internal Reference	
Scheduled date and time of meeting	
Venue	

9.3 Pre-submission Meeting (PSM) Package Checklist

Pre-submission Meeting (PSM) Package Checklist

No.	Contents	Applicant *(Please tick √) *If applicable*	***For office use only (NPRA)*** *(Please tick √) *If applicable*
1.	Cover letter specifying the company name, contact person details and proposed meeting details		
2.	Product information (e.g. Product name, strength, dosage form, proposed indication(s), manufacturing process etc.)		
3.	Active Pharmaceutical Ingredient (API)/ Drug Substance (DS) information (e.g. Chemical name, structure, manufacturing process, type of API/ DS submission etc.)		
4.	Existing treatment for the disease (worldwide and in Malaysia) - Include a brief background of the disease		
5.	Existing treatments and expected benefits of the product		
6.	Product development status in other countries - Include any relevant regulatory history (submission, approval, rejection, etc.)		
7.	Meeting presentation with full set of slides and references, scheduled to be presented at the meeting		
8.	List of attendees, with titles and affiliations: - Include a list of individuals, including titles and affiliations, from the applicant's organisation who will attend the proposed meeting		
Please include the following documents if relevant to the discussion: (*Please indicate N/A if not relevant to the meeting objective)			
9.	Previous Pre-submission meeting (PSM) notes (if PSM has been held before).		
10.	Supplementary information relevant to the objectives of the meeting (highlight any questions that you have)		
11.	Overview of the product and summary of its clinical development programme - Completed and planned studies; - Draft of clinical trial protocols; - Results of relevant clinical trials; - Clinical trials or data that the applicant intends to discuss at the meeting; - Any development plan that deviates from current guidelines or practices; Although applicant should not provide detailed documentation of trial designs or completed studies and clinical trials, sufficient information should be provided to facilitate understanding of the issues, such as a small table that summarises major results.		
12.	Other relevant quality, efficacy and safety information for the product		

Notes:

1. The complete PSM Package is to be provided **2 weeks** prior to the scheduled meeting and can be emailed to presubmission@npra.gov.my. If the total attachments are more than 5MB, you may send the information in CD together with a cover letter to:
   Industry Development and Communication Section (One-Stop Centre),
   National Pharmaceutical Regulatory Agency (NPRA),
   Lot 36, Jalan Universiti, 46200 Petaling Jaya, Selangor.
2. The PSM package should **not** include:
   - Detailed data or full study and trial reports.
   - Promotional material for the company or the product.
3. The PSM package content should be organised according to the proposed agenda:
   - Number the pages sequentially (individual sections can be numbered separately);
   - Include a table of contents, appendices, and cross-references, if necessary.
4. Upon submission, the PSM package is considered finalised and amendments are not allowed unless advised by NPRA.
5. NPRA reserves the right to request for additional documents, when necessary.

9.4 Pre-submission Meeting (PSM) Notes

National Pharmaceutical Regulatory Division (NPRA)
Ministry of Health Malaysia
Lot 36, Jalan Universiti, 46200 Petaling Jaya, Selangor.
Tel. No. : 03-78835400 Fax No. : 03-79562924
Email : presubmission@npra.gov.my Website : https ://www.npra.gov.my

NPRA use only

PRE-SUBMISSION MEETING (PSM) NOTES

Please complete each section of this form and submit within **1 week** from the date of PSM to presubmission@npra.gov.my.

Our advice at the meeting is nonbinding and is given without prejudice. As knowledge evolves over time, the advice we gave at the meeting may become out of date or be superseded with time.

1. Applicant

Company	
Address	

2. Meeting information

Meeting date	
Venue	
Start time	
Closing time	

3. Product information

Product name and strength(s)	
Dosage form(s)	
Active Ingredient(s)	
Product Manufacturer (Name and address)	
API/ DS Manufacturer(s) (Name and address)	
Proposed indication(s)	
Other relevant information	

4. Meeting participants

Name	Position and Organisation	Email Address

5. Meeting summary

Discussion points (keep brief)

(Note: Comments made by NPRA officers may be recorded as 'NPRA recommended....' rather than naming individuals)

Issue(s)	Discussion outcome(s)	Action(s) to be taken & Responsible person

Acknowledgement

I acknowledge that the advice provided at this meeting is nonbinding and was given without prejudice. As knowledge evolves over time, the advice given at this meeting may become out-of-date or be superseded with time.

Name	
Designation	
Company (Name and address)	
Phone	
Email	
Signature	
Date	