Frequently Asked Questions (FAQs):

Registration application submitted via Facilitated Registration Pathway (FRP)

1. **Does the removal of checklists for protocol of analysis (PoA) and analytical method validation (AMV) from the 2019 FRP guideline imply that PoA and AMV are no longer required for FRP submission (both abbreviated and verification review)?**

   AMV and PoA are still required for the application submitted via FRP. However, raw data for all validation tests is not required.

2. **Is the applicant required to complete and submit Annex 1**: **Declaration Statement by the applicant and Annex 2b: Dossier Checklist for FRP at the point of submission?**

   Yes, these documents need to be provided at the screening stage and attached under section E14.

   In Annex 2b: Dossier Checklist, the applicant must indicate any differences between the dossier submitted to NPRA and what has been approved by the chosen reference agency. In cases where there are post-approval changes to specific sections, the applicant is required to provide more details on the Dossier Checklist (e.g. to list what was in the reference agency assessment report during the initial approval and what was added or changed subsequently for each field and state the relevant reference agency variation number).

   Recommended examples

Item	Data approved by reference agency	Data submitted to NPRA	Comments
Drug Substance			
Manufacturer(s) S2.1	Initial assessment report Name & address of Manufacturer A XXX variation report Addition of Name & address of Manufacturer B	1) Name & address of Manufacturer A 2) Name & address of Manufacturer B	
Specification S4.1	Document (specific filename), version, and page number	Document (specific filename), version, and page number	Same as reference agency
Drug Product			
Stability Data P8	Stability data according to Zone III Document (specific filename), version, and page number	Stability data according to Zone IVb Document (specific filename), version, and page number	To comply with the ASEAN stability requirements

3. **WHO Collaborative Registration Procedure (CRP): Stringent Regulatory Authority (SRA) related questions**

3.(a) **At the pre-submission stage, should the applicant email NPRA to express interest in applying for FRP, and when should the applicant do so?**

Applicant should notify NPRA via email at the time of screening submission or sooner (no specific timeline).

3.(b) **Is there a requirement for local or global regulatory agencies to sign off on expressions of interest to take part in this procedure (Appendix 7)?**

There is no specific requirement for this. Nevertheless, it should be the same as the document submitted to WHO.

3.(c) **Does the applicant need to wait for the NPRA's reply or acknowledgement after the expression of interest (EOI) submission before proceeding with the dossier and assessment report submission?**

Generally, this is not required.

3.(d) **Is it acceptable to state "No difference, refer to quality information summary (QIS)" in the dossier checklist (Annex 2a/2b) for sections with the same information as approved via the WHO CRP SRA?**

According to the current FRP guideline, a dossier checklist is not required for a product submitted via WHO SRA CRP as the applicant has already submitted the QIS.

3.(e) **Is the ancillary document submitted to the chosen reference agency also required to be submitted to the NPRA**?

At the point of submission, the ancillary document submitted to SRA might not be required. However, NPRA may request the document when necessary based on the assessment report submitted.

3.(f) **Is the applicant required to request that WHO share the information with NPRA directly, or will the applicant be required to obtain the reports and submit them to NPRA?**

The applicant needs to liaise with WHO. The WHO will then share the information and assessment reports directly with NPRA.

4. **Following the approval of the product registration, reference agencies have granted approval to a number of variations. However, not all reference agencies issue assessment reports for chemistry, manufacturing and control (CMC) variations. Is evidence of approval of the variation sufficient?**

   In the case where the chosen reference agency does not issue an assessment report for CMC variations, proof of the variation approval stating the changes is acceptable.

5. **Is the GMP inspection report only required if the applicant is not able to provide a valid GMP certificate issued by a PIC/S member?**

   Generally, valid GMP evidence from any PIC/S participating authority is required during the submission of the registration application. The GMP inspection report is necessary in addition to the current GMP certificate that the PIC/S member has issued, specifically for the SRA/WLA CRP. The applicant must, however, provide justification in the event that the document is unavailable.

6. **Does NPRA has any established communication channels with any of the reference agency, that the applicant can use, or any personnel to directly contact and request the required assessment reports?**

   It is the responsibility of the applicant to communicate with the reference agency to obtain the full, unredacted assessment report. However, NPRA may consider accepting public assessment reports with redacted information (supplemented in the same document with comments on the redacted information, whichever is known to the applicant/product owner).

7. **The FRP guideline states that the Drug Master File (DMF) submitted to the NPRA must be identical to the one submitted to the chosen reference agency. In general, if the DMF submission process for the reference agency differs from that in Malaysia, will NPRA accept the DMF submitted to the chosen reference agency, and must they be the same version? Should the applicant submit the data as per the DMF submitted to the chosen reference agency, or can the applicant submit the current version of the same DMF, which is also registered with NPRA?**

   As we are using the reliance approach, the applicant should submit the same DMF as approved by the chosen reference agency.

8. **The FRP guideline states that applicants may submit data to meet ASEAN requirements. Aside from the examples given in the FRP guideline (container closing system and stability data), can the applicant provide an updated dossier from the chosen reference agency approval that includes other ASEAN data requirements such as ASEAN validation, etc.?**

   The applicant may submit an updated dossier from the chosen reference agency approval that includes other ASEAN data requirements, however this must be accompanied with the documents pertaining to post-approval variations, as specified in the FRP guideline.

9. **Do the specifications approved by the reference agency have to be aligned with the FRP submission, or may the applicant include additional specifications to support ASEAN conditions?**

The submission for the FRP should be in line with the specifications that the reference agency has approved. However, additional specifications (if required to support ASEAN conditions) can be considered if they are clearly justified. The applicant may explain and highlight the additional differences compared to the original reference agency approval in the declaration letter (see 3.1.2.2(b)) and in Annex 2B of the FRP guideline.

10. **If the NPRA rejects the application submitted under the FRP at the screening stage, would it be immediately routed to the standard pathway, or would it need to be resubmitted?**

If the screening process reveals that several critical documents are lacking for an application submitted under the FRP pathway, the application will be rejected at this stage. Thus, the applicant will need to resubmit the application.

If the product registration application meets all criteria for evaluation under FRP, the application can be approved at the screening stage. However, please note that if discrepancies are identified between the data provided to the NPRA and the stated declaration during the evaluation process, the application can be rerouted to the standard pathway.

11. **What are the fees associated with the registration application submitted via the FRP?**

Fees are currently the same as the standard pathway (see Appendix 9 of the DRGD). https://www.npra.gov.my/easyarticles/images/users/1153/DRGD%20October%202023/Complete-Drug-Registration-Guidance-Document-DRGD-3rd-Edition-6th-Revision-October-2023.pdf)
However, please note that fees may be subject to future revisions.

12. **For generic products, the Bioequivalence Study Desktop Audit (BEDE) requirement still needs to be met?**

The BEDE application is deemed unnecessary for products qualified for FRP.

13. **If the bioequivalence (BE) study reference product differs from the Malaysian BE comparator, must the applicant adhere to the Malaysian recommended BE reference product?**

The BE reference product used for the BE study should be similar to the Malaysia Comparator Product as stated in the FRP guideline.

14. **The FRP guideline states that any difference in the manufacturing site of the drug product will be considered if it is clearly justified. What are the examples in which different manufacturing sites can be considered?**

Only differences that do not affect the quality of the product and do not warrant additional evaluation can be considered, e.g., the list of manufacturers is less than the one approved by the chosen reference agency, different secondary packagers, different batch releasers, the addition of local repackers, etc.