

M8 VENDOR GROUP QUESTIONS

Important Note: This information is based on the information and circumstances provided at the date of publication and may change as new developments arise.

The following questions were received between vendor group meetings and responses crafted for dissemination prior to the next M8 Vendor Group meeting.

1. Q&A

#	Questions and Answers – [action items are included for M8 IWG]
1	Question: 1. Can you please elaborate on handling cases of acquisitions? Specifically on handling keywords and CodeSystems for sender defined keywords. Our understanding is that CodeSystem cannot be changed. In the case of an acquisition what is the best practice on handling differing CodeSystems. Further, if the acquired application is to be used in a group submission and the CodeSystems are different across applications, is there a way to remediate this? 1a: Similarly, If multiple companies use the same manufacturer (for instance) and company A acquires company B and its applications. Company A will already have defined keywords for the manufacturer that may not align with the same code company B was using for the manufacturer. What is your recommendation on remediating this? This may impact master data management systems where duplicate data may need to be entered for the same manufacturer (for example) where the only difference is keyword information. Is it possible to update the code of the acquired companies' keywords? Answer: ICH is not prescriptive for how to handle assignment of codes and codeSystems beyond what is specified. Companies need to determine if the application life cycle will merge into their master data management. Grouped Submissions are a regional consideration. We recommend that life cycle be broken, and a new keyword definition be added to the acquired Application with the codeSystem that will be used across all applications.
2	Question: Can you comment on IDMP and if there are any plans to use some of the eCTD 4 metadata and ingest this into IDMP? Answer: The eCTD v4.0 metadata, not the information as data itself, is not intended to be at the same granularity as IDMP or ingested into that format. Regional regulators may choose to utilise IDMP structured data in their regional implementations (e.g. Substance/Product data for Quality documents). The IDMP structure and content will be considered for ICH concepts on structured data submissions (see also ICH M4Q development).
3	Question: Can you please elaborate on the Group Title keyword. In the specification it calls it a replacement of Node Extensions as well as a way to specify extra granularity if needed. For studies/non-clinical studies in module 4 and 5. If node-extensions were used previously should both the Group Title keyword be provided along with the study id_study title keyword? If STFs were used previously, is the Group Title keyword needed or can just the study id_study title keyword be used? Answer: The StudyId_StudyTitle keyword definition should be used whether the STF or Node Extension was used in v3.2.2. Any Node Extension that now has a dedicated Keyword

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	Definition type – the Group Title should not be used. Therefore, the Group title should <i>only</i> be used for keyword definitions that have not been specified.
4	Question: 4. ICH Context of Use Code ich_3.2.s.1 does not have any lower level codes associated with it. In 3.2 there were additional XML elements m3-2-s-1-1-nomenclature, m3-2-s-1-2-structure, and m3-2-s-1-3-general-properties defined in the DTD. Can you please confirm that these are no longer required and all of the document previously associated with this section can be submitted under the heading ich_3.2.s.1 in eCTD 4.0? Answer: Yes, we confirm – those headings are no longer available for use in v4.0. Forward compatibility will follow the same rules for context group life cycle. Any leafs under subheadings (3.2.s.1.1, 3.2.s.1.2, 3.2.s.1.3) will break life cycle and content will need to be submitted at 3.2.s.1 or higher with any relevant v4.0 keywords.
5	Question: In the case of forwards compatibility. The specification states Content from v3.2.2 may come from the index.xml, regional.xml or stf.xml files. When replacing ICH v3.2.2 content or submitting new v4.0 content that should be grouped with v3.2.2 content, the index.xml attribute values (e.g., manufacturer) and stf.xml values (e.g., study id title, file-tag) must match. The mapping table makes reference that the keyword.code@code should match with its legacy 3.2 values. Can you please confirm that it is in fact the code that should match between 3.2 and 4.0 and not the displayName@value of the keyword? I believe the answer is yes. But just want to be sure. Answer: The Keyword.code@code will be the pointer to the keywordDefinition displayName value. We will clarify that the value item displayName value attribute in keyword definition is the value that should match. The keyword codes do not need to be human readable nor are they expected to match the previous attributes as defined in Table 9. We plan to address this as a Q&A and IG update.
6	Question: Following up on forward compatibility. In the m4 granularity index (https://www.ema.europa.eu/en/documents/scientific-guideline/ich-guideline-m4-r4-common-technical-document-ctd-registration-pharmaceuticals-human-use-organisation-ctd-step-5_en.pdf) in reference to the manufacturer keyword there is a paragraph explaining the use of 'all' as metadata for manufacturers. <i>The “manufacturer” keyword was designed to facilitate lifecycle management where there might be different manufacturers (e.g., using a different drug substance route of synthesis (chemical entity) or manufacturing process (biologic)). If the applicant determines that there is no need to have multiple 3.2.S or 3.2.P sections (e.g., where few 3.2.S.x topics have manufacturer/site/process-specific documents (either now or likely in the future)) then the use of this keyword is not recommended; there is no benefit of a general umbrella term such as “all” or “applicant” or “not specified”. The value for the “manufacturer” keyword might be a firm’s name, the first word or abbreviation of a long company name, a site name, or simply words that differentiate different routes or processes. Use a term that is less likely to change during the life of the application.</i> My question: for forward compatibility purposes since 3.2 and 4.0 metadata must match. If sponsors have used “all” or “applicant” or “not specified” is the expectation that a keyword using the generic 'all' be defined to maintain forwards compatibility? Answer: In general, to retain life cycle of content submitted in 3.2.2 that included attributes no longer recommended for use, keywords should be established in v4.0 to match the leaf attributes if they are allowed. Alternatively, life cycle can be broken to remove the keyword

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definition values no longer recommended or allowed. The cited guidance is for new v4.0 applications to not introduce these keyword definition values.

7 **Question:** Regarding priority numbers for suspended context of use in a context group. In the following example:

Sub 1 contains the following COUs in a context group

- CoU A - priority number 32
- CoU B - priority number 64
- CoU C - priority number 96

In Submission 2 for the same context group which of the below is acceptable if any?

Case 1:

CoU C - SUSPENDED (priority number 96)
CoU D - 96 (dupe number however CoU C is no longer active)
COU E - 128

Case 2:

CoU C - SUSPENDED (priority number 100 (if the priority number changed for a suspended CoU does it need updateMode =R?))
CoU D - 96
COU E - 128

Answer: Case 1 is supported by the ICH Implementation Guide that allows the reuse of priority numbers and is the option that is acceptable. We do not allow Case 2 and it may currently be rejected in some Regions.

Reminder: Any clarifications and/or recommended changes to the implementation specifications can be submitted as [change requests](#).