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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Subject: Response to Draft Guidance for Industry: "International Conference on Harmonization, Draft Guidance on the M4 Common Technical Document –Quality, Questions and Answers/Location Issues", Federal Register, Monday, December 30, 2002, Docket No. 02N-0509 and "International Conference on Harmonisation; Draft Guidance on the M4 Common Technical Document--Quality: Questions and Answers/Location Issues; Correction", Federal Register, Thursday, January 9, 2003, Docket No.02D-0509 (change in docket number)

To whom it may concern:

Novartis is a world leader in the research and development of products to protect and improve health and well-being. As a global pharmaceutical corporation, Novartis is supportive of efforts to improve and to harmonize the technical requirements for registration of pharmaceutical products. We appreciate the opportunity to comment on this guidance.

Novartis is generally in agreement with the comprehensive comments dated 29-Nov-2002 which were submitted to ICH by EFPIA (European Federation of Pharmaceutical Industries and Associations), particularly with respect to the following points:

1. Despite its stated purpose, in some cases, the guidance may be interpreted to define detailed content of the application file rather than location and format. It needs to be further clarified that this guidance is not describing content and only provides guidelines on presentation, format and placement.
For example, under location issues in Drug Substance 3.2.S.4.4, the first two issues address detailed content and should be reworded. There is a question "*Should all tests performed be reported even if not included in the specification?*" To change the orientation of the question from content to format, it might be reworded as follows: *'If I have results from tests not included in the specification that I wish to provide to an Authority, where should I put them?'*

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2. The guidance does not adequately address one of the major formatting issues associated with the ICH CTD guidance, namely the presentation of information on pharmacopoeial excipients in P.4 Control of Excipients. We believe more consideration to this topic should be given.
3. For those sections where single or multiple documents are possible, it would be helpful to understand whether a combination of the approaches is acceptable, determined by the most logical presentation of the technical information.
4. More flexibility is required with respect to the submission of single or multiple documents and the use of attachments (particularly in complex sections such as Development Pharmaceutics and Stability); there are many instances where the submission of multiple documents and attachments will result in an NDA that is much more navigable and user-friendly to the reviewer.

These comments are being provided in duplicate in written form and electronically as directed in the Federal Register Notice.

Thank you for the opportunity to comment. If you have any questions, please contact me at (862) 778-6949 or at e-mail: orin.tempkin@pharma.novartis.com

Sincerely,



Orin Tempkin, Ph.D.

Global Regulatory CMC