



# **GUIDELINES TO CONDUCT CLINICAL RESEARCH ON THERAPEUTIC GOODS IN PAKISTAN**

**Document No:** PHSR/GL/CT/002  
**Document History:** 3<sup>rd</sup> Edition  
**Effective Date:** 01-07-2025

**Drug Regulatory Authority of Pakistan**  
Islamabad - Pakistan

## DOCUMENT HISTORY

	Effective Date	Reason for Revision
Edition 01	20-05-2022	Initial Document
Edition 02	14-03-2024	To cover all domains of Clinical Research on therapeutic goods as per the Bio-Study Rules, 2017
Edition 03	01-07-2025	<ul style="list-style-type: none"> <li>• Addition of CTS in already approved trial, included in minor amendments</li> <li>• Guidance regarding DSUR &amp; PBRER format (as per ICH guidelines)</li> <li>• Inclusion of templates/format for the following:               <ol style="list-style-type: none"> <li>i. Template for IRB/ERC ethical approvals (<b>Annexure-XIII</b>)</li> <li>ii. Template for IRB/ERC Members Composition Notification (<b>Annexure-XIV</b>)</li> <li>iii. Template for Quarterly Progress Report (<b>Annexure-XV</b>)</li> <li>iv. Template for Clinical Study Report (<b>Annexure-XVI</b>)</li> </ol> </li> </ul>

## **1 HISTORY**

This is the third edition of these guidelines.

## **2 APPLICATION**

These guidelines are applicable on the Sponsors, Researchers, Investigators, Contract Research Organization (CROs) and Bio-Analytical Laboratories, who intends to submit a new application or involved in conduct of Clinical Trial/Research on therapeutic goods or its subsequent submissions under the regulatory scope of the Bio-Study Rules, 2017.

## **3 PURPOSE**

This document is intended to provide general guidance to applicants in making new applications for Clinical Trials/Research on therapeutic goods, or any subsequent submissions to the Drug Regulatory Authority of Pakistan (DRAP). The current guideline describes the regulatory requirements, procedure for submission, review, evaluation and approval of applications for the conduct of Clinical Trial/Research, and all other process related to Clinical Research from its start till completion.

These guidelines are drawn in conformity with the legal requirements of the Bio-Study Rules 2017, Drug Act 1976, DRAP Act, 2012 and the latest ICH-GCP Guidelines. In the event of any contradiction between the contents of this document and any written law, the latter should take precedence. The Authority accepts no liability for any errors or omissions in this guidance document, or for any action / decision taken as a result of using this document. The Authority reserves the right to amend any part of these guidelines whenever it deems fit.

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## GLOSSARY

### Acronyms

<b>ADR</b>	Adverse Drug Reaction
<b>AE</b>	Adverse Event
<b>BA/BE</b>	Bioavailability / Bioequivalence
<b>BAL</b>	Bio-Analytical Laboratory
<b>CIOMS</b>	Council of International Organization for Medical Science
<b>CoA</b>	Certificate of Analysis
<b>CRO</b>	Contract Research Organization
<b>CR</b>	Clinical Research (pertains to Clinical Trial or BA/BE Study)
<b>CRA</b>	Clinical Research Application
<b>CRF</b>	Case Report Form
<b>CSC</b>	Clinical Studies Committee
<b>CSR</b>	Clinical Study Report
<b>CTRP</b>	Clinical Trial Registry of Pakistan
<b>DLP</b>	Data Lock Point
<b>DRAP</b>	Drug Regulatory Authority of Pakistan
<b>DSUR</b>	Development Safety Update Report
<b>DSMB</b>	Data Safety Monitoring Board
<b>ERC</b>	Ethics Review Committee
<b>FIFO</b>	First In First Out
<b>GCP</b>	Good Clinical Practice
<b>GLP</b>	Good laboratory Practice
<b>GMP</b>	Good Manufacturing Practice
<b>IB</b>	Investigator's Brochure
<b>ICF</b>	Informed Consent Form
<b>ICH</b>	International Conference on Harmonization
<b>IRB</b>	Institutional Review Board
<b>IRC</b>	Institutional Review Committee
<b>ISCTN</b>	International Serial Clinical Trial Number
<b>LPLV</b>	Last Patient Last Visit
<b>LSO</b>	Last Subject Out
<b>MRCT</b>	Multi-Regional Clinical Trial
<b>MCCT</b>	Multi Countries Clinical Trial
<b>NBC</b>	National Bio-ethics Committee

<b>PI</b>	Principal Investigators
<b>PBRER</b>	Periodic Benefits-Risk Evaluation Report
<b>SAE</b>	Serious Adverse Events
<b>SER</b>	Summary Evaluation Report
<b>TRS</b>	Technical Review Series
<b>WHO</b>	World Health Organization

## **Definitions**

### **Adverse Drug Reaction**

“Adverse drug reaction” or “ADR” means response to medicines or therapeutic good which is noxious and unintended that occurs at doses normally used for the prophylaxis, diagnosis, or therapy of disease or for the restoration, correction or modification of physiological function. A response in this context means that a causal relationship between a medicinal product and an adverse event is at least a reasonable possibility. An adverse reaction, in contrast to an adverse event, is characterized by the fact that a causal relationship between a medicinal product and an occurrence is suspected;

#### ***OR***

In the pre-approval clinical experience with a new medicinal product or its new usages, particularly as the therapeutic dose(s) may not be established: all noxious and unintended responses to a medicinal product related to any dose should be considered adverse drug reactions. The phrase responses to a medicinal product means that a causal relationship between a medicinal product and an adverse event is at least a reasonable possibility, i.e. the relationship cannot be ruled out. Regarding marketed medicinal products: a response to a drug which is noxious and unintended and which occurs at doses normally used in man for prophylaxis, diagnosis, or therapy of diseases or for modification of physiological function.

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### **Adverse Event**

“Adverse event” or “AE” means any untoward medical occurrence in a patient or clinical investigation subject administered a pharmaceutical product or therapeutic good and which does not necessarily have a causal relationship with this treatment;

#### ***OR***

Any untoward medical occurrence in a patient or clinical investigation subject administered a pharmaceutical product and which does not necessarily have a causal relationship with this treatment. An adverse event (AE) can therefore be any unfavorable and unintended sign (including an abnormal laboratory finding), symptom, or disease temporally associated with the use of a medicinal (investigational) product, whether or not related to the medicinal (investigational) product.

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### **Applicable Regulatory Requirement(s)**

Drug Regulatory Authority of Pakistan, law(s) and regulation(s) addressing the conduct of clinical trials/research of investigational products.



<b>Approval (In relation to IRB / IRC / IEC / ERC)</b>	The affirmative decision of the IRB / IRC / IEC / ERC that the clinical trial has been reviewed and may be conducted at the institution site within the constraints set forth by the IRB, the institution, Good Clinical Practice (GCP), and the applicable regulatory requirements.
<b>Audit</b>	A systematic and independent examination of trial related activities and documents to determine whether the evaluated trial related activities were conducted, and the data were recorded, analyzed and accurately reported according to the protocol, sponsor's standard operating procedures (SOPs), Good Clinical Practice (GCP), and the applicable regulatory requirement(s).
<b>Audit Certificate</b>	A declaration of confirmation by the auditor that an audit has taken place.
<b>Audit Report</b>	A written evaluation by the Sponsor's or Regulatory Authority's auditor of the results of the audit.
<b>Audit Trail</b>	Documentation that allows reconstruction of the course of Audit.
<b>Blinding/Masking</b>	A procedure in which one or more parties to the trial are kept unaware of the treatment assignment(s). Single-blinding usually refers to the subject(s) being unaware, and double blinding usually refers to the subject(s), investigator(s), monitor, and, in some cases, data analyst(s) being unaware of the treatment assignment(s).
<b>Case Report Form (CRF)</b>	A printed, optical, or electronic document designed to record all of the protocol required information to be reported to the sponsor on each trial subject.
<b>Certified Copy</b>	A copy (irrespective of the type of media used) of the original record that has been verified (i.e. by a dated signature or by generation through a validated process) to have the same information, including data that describe the context, content, and structure, as the original.
<b>Clinical Research</b>	Any type of Clinical Research (Interventional Clinical Trials or BA/BE Studies) that involves human subjects and aims to determine the safety and efficacy of therapeutic goods (with or without placebo) and treatment regimens intended for human use.
<b>Clinical Trial / Research Application</b>	<p>The Clinical Trial/Research application is the dossier that includes all documentation pertaining to the conduct of clinical trial/research in country according to the regulation. The dossier includes a cover letter, CV's of investigators, protocol and an investigator's brochure or product information etc.</p> <p>(Protocol and Investigator's brochure should be in accordance with ICH-GCP guidelines).</p> <p>All applications regarding conduct of Clinical Trials on allopathic medicines (pharmaceutical, biological etc.) are dealt under latest ICH-GCP guidelines, however, applications regarding conduct of Clinical Trials of alternate medicines (herbal and homeopathic products) and medical devices are reviewed and decided by the Clinical Studies</p>

Committee on case to case basis.

<b>IPs/Drug Import License (DIL)</b>	DRAP, authorizing the licensee to import any product for purposes of clinical trials, notwithstanding that the product is not a registered product, or a license issued by DRAP authorizing the licensee to import any registered or unregistered product for purposes of clinical trials.
<b>Clinical Trial/ Study Report</b>	A written description of a trial/study of any therapeutic, prophylactic, diagnostic agent conducted in human subjects, in which the clinical and statistical description, presentations, and analyses are fully integrated into a single report (see the ICH (E3) Guideline for Structure and Content of Clinical Study Reports).
<b>Clinical Trial/Study</b>	Any investigation in human subjects intended to discover or verify the clinical, pharmacological and/or other Pharmacodynamics effects of an investigational product(s) and/or to identify any adverse reactions to an investigational product(s) and/or to study absorption, distribution, metabolism, and excretion of an investigational product(s) with the object of ascertaining its safety and/or efficacy. The terms clinical trial and clinical study are synonymous.
<b>Clinical Trials (Phase)</b>	A systematic study on therapeutic goods in human subjects (including patients and other volunteers) in order to discover or verify the effects of and/or identify any adverse reaction to investigational products, and/or to study the absorption, distribution, metabolism and excretion of the products with the object of ascertaining their efficacy and safety. Clinical trials are generally classified into Phases I to IV. It is not possible to draw distinct lines between the phases, and diverging opinions about details and methodology do exist. Brief descriptions of the individual phases, based on their purposes as related to clinical development of pharmaceutical products, are given below:
<b>Comparator Product</b>	An investigational product, used as a reference in a Clinical Trial or BA/BE Study.
<b>Compliance (in relation to trials)</b>	Adherence to all the trial-related requirements, Good Clinical Practice (GCP) requirements, and the applicable regulatory requirements.
<b>Confidentiality</b>	Prevention of disclosure, to other than authorized individuals, of a Sponsor's proprietary information or of a subject's identity.
<b>Contract</b>	A written, dated, and signed agreement between two or more involved parties that sets out any arrangements on delegation and distribution of tasks and obligations and, if appropriate, on financial matters. The protocol may serve as the basis of a contract.
<b>Contract Research Organization (CRO)</b>	A person or an organization contracted by the sponsor to perform one or more of a sponsor's trial-related duties and functions.
<b>Coordinating Investigator</b>	An investigator assigned the responsibility for the coordination of investigators at different centers participating in a multicenter trial.

<b>Direct Access</b>	Permission to examine, analyze, verify, and reproduce any records and reports that are important for evaluation of a clinical trial. Any party (e.g., domestic and foreign regulatory authorities, sponsor's monitors and auditors) with direct access should take all reasonable precautions within the constraints of the applicable regulatory requirement(s) to maintain the confidentiality of subjects' identities and sponsor's proprietary information.
<b>Documentation</b>	All records, in any form (including, but not limited to, written, electronic, magnetic, and optical records, and scans, x-rays, and electrocardiograms) that describe or record the methods, conduct, and/or results of a trial, the factors affecting a trial, and the actions taken.
<b>Drug Regulatory Authority of Pakistan (DRAP)</b>	National Regulatory Authority established in Pakistan for the purpose of regulating the Therapeutic Goods.
<b>Essential Documents</b>	Documents which individually and collectively permit evaluation of the conduct of a study and the quality of the data produced.
<b>Good Clinical Practice (GCP)</b>	A standard for the design, conduct, performance, monitoring, auditing, recording, analyses, and reporting of clinical trials that provides assurance, that the data and reported results are credible and accurate, and the rights, integrity, and confidentiality of trial subjects are protected.
<b>Impartial Witness</b>	A person, who is independent of the trial, who cannot be unfairly influenced by people involved with the trial, who attends the informed consent process if the subject or the subject's legally acceptable representative cannot read, and who reads the informed consent form and any other written information supplied to the subject.
<b>Institutional Review Committee (IRC) / Institutional Review Board (IRB) / Independent Ethics Committee (IEC) or Ethics Research Committee (ERC)</b>	An independent body constituted of medical, scientific, and non-scientific members whose responsibility is to ensure the protection of the rights, safety and well-being of human subjects involved in a trial by, among other things, reviewing, approving, and providing continuing review of trial protocol and amendments and of the methods and material to be used in obtaining and documenting informed consent of the trial subjects and providing continuing review of trial protocol and amendments and of the methods and material to be used.
<b>Interim Clinical Trial/ Study Report</b>	A report of intermediate results and their evaluation based on analyses performed during the course of a trial.
<b>Investigational Products (IPs)</b>	Any therapeutic good or placebo being tested or used as a reference in a clinical trial, including a registered/enlisted product when used or assembled (formulated or packaged) in a way different from the approved form, or when used for an unapproved indication or when used to gain further information about an approved use.
<b>Investigator</b>	A person responsible for the conduct of the clinical trial at a trial site. If a trial is conducted by a team of individuals at a trial site, the

investigator is the responsible leader of the team and may be called the principal investigator. Principle Investigator will be responsible for whole Clinical Studies / Trial.

<b>Investigator Institution</b>	A person responsible for the conduct of the clinical trial at a trial site. If a trial is conducted by a team of individuals at a trial site, the investigator is the responsible leader of the team and may be called the principal investigator.
<b>Investigator's Brochure</b>	A compilation of the available clinical and non-clinical data on the investigational product(s) which is relevant to the study of the investigational product(s) in human subjects or animals. Investigator brochure should be in accordance with Section 7 of ICH-GCP guidelines, as per Rule 15 of the Bio- Study Rules 2017. (See Annexure-V of these guidelines for IB contents).
<b>Manufacture</b>	Any operation that include products production, quality control, release, storage, shipment (from storage related to manufacturing site) of finished products, and related controls.
<b>Manufacturer</b>	A company that carries out at least one step of production as well as the final release of the finished product.
<b>Monitoring</b>	The act of overseeing the progress of a clinical trial, and of ensuring that it is conducted, recorded, and reported in accordance with the protocol, Standard Operating Procedures (SOPs), Good Clinical Practice (GCP), the Bio-Study Rules 2017, DRAP Act 2012 and the rules made under.
<b>Monitoring Plan</b>	A document that describes the strategy, methods, responsibilities, and requirements for monitoring the trial.
<b>Monitoring Report</b>	A written report from the monitor to the sponsor after each site visit and/or other trial-related communication according to the sponsor's SOPs.
<b>Multi-center Trial</b>	A clinical trial conducted according to a single protocol but at more than one site, and therefore, carried out by more than one investigator.
<b>Opinion (in relation to Independent Ethics Committee)</b>	The judgment and/or the advice provided by an Independent Ethics Committee (IEC), Institutional Review Committee (IRC), Institutional Review Board (IRB), or Ethics Research Committee (ERC)
<b>Phase I</b>	These are the first trials of a new active ingredient or new formulation in humans often carried out in healthy volunteers. Their purpose is to establish a preliminary evaluation of the safety and the pharmacokinetic, and where possible the pharmacodynamics profile of the active ingredient(s) in humans/animals
<b>Phase II</b>	These trials are performed in a limited number of subjects and are often, at a later stage, of a comparative (e.g. placebo-controlled) design. Their purpose is to demonstrate therapeutic activity and to assess short-term safety of the active ingredient in patients suffering from a disease or condition for which the active ingredient is intended. This phase also aims

at the determination of appropriate dose ranges or regimens and (if possible) clarification of dose-response relationships in order to provide an optimal background for the design of extensive therapeutic trials.

<b>Phase III</b>	Trials in larger (and possibly varied) patient groups with the purpose of determining the short-and long-term safety/efficacy balance of formulation(s) of the active ingredient, and of assessing its overall and relative therapeutic value. The pattern and profile of any frequent adverse reactions must be investigated and special features of the product must be explored (e.g. clinically- relevant drug interactions, factors leading to differences in effect such as age). These trials should preferably be of a randomized double-blind design, but other designs may be acceptable, e.g. long-term safety studies. Generally, the conditions under which these trials are carried out should be as close as possible to normal conditions of use.
<b>Phase IV</b>	Studies performed after marketing of the pharmaceutical product. Trials in phase IV are carried out on the basis of the product characteristics on which the marketing authorization was granted and are normally in the form of post- marketing surveillance, or assessment of therapeutic value or treatment strategies. Although methods may differ, these studies should use the same scientific and ethical standard as applied in premarketing studies. After a product has been placed on market, clinical trials designed to explore new indications, new methods of administration or new combinations, etc. are normally considered as trials for new pharmaceutical products.
<b>Product (synonym medical product)</b>	Any therapeutic goods having a singular identity, composition, characteristics and origin.
<b>Protocol</b>	A document that describes the objective(s), design, methodology, statistical considerations, and organization of a clinical trial. The protocol usually also gives the background and rationale for the trial, but these could be provided in other protocol referenced documents. Throughout these Guideline the term protocol refers to protocol and protocol amendments. The protocol should be in accordance with section 6 of the ICH-GCP guidelines. (See Annexure-VI of these guidelines for protocol contents).
<b>Protocol Amendment / Amendment</b>	A written description of a change(s) to or formal clarification of a clinical trial protocol.
<b>Quality Assurance (QA)</b>	All those planned and systematic actions that are established to ensure that the trial is performed and the data are generated, documented (recorded), and reported in compliance with Good Clinical Practice (GCP) and the applicable regulatory requirement(s).
<b>Quality Control (QC)</b>	The operational techniques and activities undertaken within the quality assurance system to verify that the requirements for quality of the trial-related activities have been fulfilled.
<b>Randomization</b>	The process of assigning trial subjects to treatment or control groups using an element of chance to determine the assignments in order to reduce bias.

<b>Registered / Enlisted Product</b>	Any therapeutic goods approved or permitted to be marketed in the country by DRAP
<b>Serious Adverse Event or Serious Adverse Drug Reaction</b>	Any untoward medical occurrence that at any dose: <ul style="list-style-type: none"> <li>• Results in death.</li> <li>• Is life –threatening.</li> <li>• requires inpatient hospitalization or prolongation of existing hospitalization</li> <li>• results in persistent or significant disability/in capacity, or</li> <li>• Results in a congenital anomaly/birth defect</li> </ul>
<b>Side effect</b>	Unintended effect occurring at normal dose related to the pharmacological properties of a drug.
<b>Source Documents</b>	Original documents, data, and records (e.g. hospital records, clinical and office charts, laboratory notes, memoranda, subjects' diaries or evaluation checklists, pharmacy dispensing records, recorded data from automated instruments, copies or transcriptions certified after verification as being accurate copies, microfiches, photographic negatives, microfilm or magnetic media, x-rays, subject files, and records kept at the pharmacy, at the laboratories and at medico-technical departments involved in the clinical trial).
<b>Sponsor</b>	An individual, company, institution, or organization which takes responsibility for the initiation, management, and/or financing of a clinical trial.
<b>Sponsor-Investigator</b>	An individual who both initiates and conducts, alone or with others, a clinical trial, and under whose immediate direction the investigational product is administered to, dispensed to, or used by a subject. The term does not include any person other than an individual (e.g., it does not include a corporation or an agency). The obligations of a sponsor-investigator include both those of a sponsor and those of an investigator.
<b>Sub investigator</b>	Any individual member of the clinical trial team designated and supervised by the investigator at a trial site to perform critical trial- related procedures and/or to make important trial-related decisions, (e.g., associates, residents, research fellows). See also Investigator.
<b>Subject Identification Code</b>	A unique identifier assigned by the investigator to each trial subject to protect the subject's identity and used in lieu of the subject's name when the investigator reports adverse events and/or other trial related data.
<b>Subject/ Trial Subject</b>	Human participants in a clinical trial. An individual who participates in a clinical trial, either as a recipient of the investigational product(s) or as a control.
<b>Therapeutic Goods</b>	"Therapeutic goods" includes drugs or alternative medicine or medical devices or biologicals or other related products as may be notified by the Authority.

<b>Trial Site</b>	The location(s) where trial-related activities are actually conducted.
<b>Unexpected Adverse Reaction</b>	An adverse reaction, the nature or severity of which is not consistent with the applicable product information (e.g., Investigator's Brochure
<b>Unregistered / Un-enlisted Product</b>	Any product that is not registered or permitted to be marketed in the country by the DRAP.
<b>Well-being (of the trial subjects)</b>	The physical and mental integrity of the subjects in a clinical trial.



## 4 INTRODUCTION

The Drug Regulatory Authority of Pakistan (DRAP) regulates the conduct of clinical trials on therapeutic goods in Pakistan under the Bio-Study Rules, 2017. Clinical trials include investigational studies in humans intended to discover or verify the clinical, pharmacological, or other pharmacodynamics effects of an investigational product, or to identify any adverse reactions to an investigational product, (i.e. Phase I to Phase IV studies), or to study absorption, distribution, metabolism and excretion of an investigational product with the object of ascertaining its safety and efficacy.

Investigational products include registered or enlisted product, placebo, or unauthorized therapeutic goods with any type of active substance, including pharmaceutical, biological, herbal and homeopathic products, and medical devices, etc. Authorized products (registered / enlisted) may be used in accordance with the terms of the registration or enlistment as applicable, or used in a different way, e.g., at a higher dose, for a new indication or when packaged in a different container closure system. All applications regarding conduct of Clinical Trials on allopathic medicines (pharmaceutical, biological etc.) are dealt under latest ICH-GCP guidelines, however, applications regarding conduct of Clinical Trials of alternate medicines (herbal and homeopathic products) and medical devices are reviewed and decided by the Clinical Studies Committee on case to case basis.

These guidelines will assist researchers / investigators on the procedures for filing applications of clinical trials and will provide an insight on the steps to be followed by the applicants who wish to conduct Clinical Trials/Research in Pakistan. It is required that all the therapeutic goods and health products used in Pakistan are registered with the Drug Regulatory Authority of Pakistan (DRAP) and any Clinical Research using such registered/enlisted or unregistered/un-enlisted products must receive written approval (i.e. license for Clinical Trial Site, CRO or BA/BE Center and registration for Clinical Research) from DRAP, under the Bio-Study Rules 2017 for intended purpose.

Approval of Clinical Research application by the DRAP for conduct of the Clinical Research does not absolve the applicant from compliance with another applicable law or regulation of the country. Furthermore, assessment of a Clinical Research application and assessment of registration dossier for the same products are two distinct processes and thus approval of a Clinical Research does not determine the acceptability or otherwise of a marketing authorization

/ registration /enlistment application of therapeutic good.

## 5 LEGAL FRAMEWORK

DRAP regulates issues related to safety, quality, efficacy, handling and use of investigational products in clinical trials under Section 3 and 7 of the Bio-Study Rules 2017 and subsection (c) (ix) of section 7 of Drug Regulatory Authority of Pakistan Act, 2012. The Authority may issue an authorization on Form-V and Form-VI of the Bio-Study Rules 2017, to any applicant, for carrying out clinical trials in respect of an investigational product / therapeutic good that may be specified in the certificate.

## 6 REQUIREMENT FOR CONDUCT OF CLINICAL TRIALS/ RESEARCH OR BA/BE STUDIES



According to Bio-Study Rules, 2017, a Clinical Trial or BA/BE Study may only be started or conducted in the Pakistan if:

- i. the Clinical Trial Site or BA/BE Study Center is licensed by the Clinical Studies Committee of the DRAP;
- ii. the Institutional Review Board (IRB / ERC /IRC) and National Bioethics Committee (NBC) have granted a favorable opinion to the Clinical Trial / BA/BE Study;
- iii. the Clinical Trial / BA/BE Study is approved /registered by the Clinical Studies Committee of the DRAP.

## 7 KEY RESPONSIBILITIES OF STAKEHOLDERS

### 7.1 Drug Regulatory Authority of Pakistan (DRAP):

Drug Regulatory Authority of Pakistan being the National Regulatory body for therapeutic goods is responsible for the issues related to safety, quality, efficacy, handling and use of investigational products in the Clinical Research under Rule 3 and 7 of the Bio-Study Rules 2017 and sub-section (c) (ix) of section 7 of Drug Regulatory Authority of Pakistan Act, 2012. No person may carry out any Clinical Research in Pakistan, in respect of any therapeutic good unless he or she is in possession of a registration certificate and/or Site/Center license issued by the DRAP.

### 7.2 National Bio Ethics Committee (NBC):

National Bioethics Committee is responsible for ethical approval of all Clinical Research to be conducted in Pakistan. Prior approval from NBC, is mandatory for decision of Clinical Research application by the CSC DRAP, as per Rule 9(1) of the Bio-Study Rules 2017.

#### 7.2.1 Public or Private Health Institution's IRB / ERC / IRC:

As per Rule 9 (1) and (3) of the Bio-Study Rules 2017, IRB / ERC / IRC of the Public or Private Health Institutions shall be responsible for ethical clearance and periodic review of the Clinical Research, being carried out in the institution, and submission of their reports to the CSC.

Obtaining approval from an IRB / ERC /IRC is the first step in securing ethical clearance for a trial or study. To promote uniformity in content and format across the country, a standardized template for IRB / ERC / IRC notifications and ethical clearance letters is provided. These templates are intended to guide and support all IRB / ERC /IRC, and their notifying bodies in issuing consistent and comprehensive approvals

- i. Template for IRB/ERC ethical approvals (**Annexure-XIII**)
- ii. Template for IRB/ERC Members Composition Notification (**Annexure-XIV**)

### 7.3 Sponsor:

The Sponsor is the person who takes responsibility for the initiation, management and/or financing of a Clinical Research. The Sponsor may delegate any or all of his/her research-related duties and functions to another person / organization (i.e. Contract Research Organization). Any duty or function that is delegated to a third party must be documented and specified in writing in the application form. The sponsor remains ultimately responsible for ensuring that the conduct of the trial/research and the data generated complies with the applicable regulatory requirements and the ICH-GCP guidelines.

#### **7.4 Principal Investigator:**

Principal Investigator (PI) is the researcher, usually a doctor or other healthcare professional, who assumes full responsibility for a research study, including but not limited to, the oversight and training of research assistants, administration of informed consent, and protecting participant confidentiality and leads the clinical research along with the other members of the research team, regularly monitors study participants' health to determine the study's safety and effectiveness. A PI is primarily responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, or other sponsored project in compliance with applicable laws and regulations and institutional policy governing the conduct of clinical research.

In case where application is for Clinical Research of Medical Device or Alternate Medicine, a Clinician/Medical Doctor must be the part of the study team or the case may be decided by the CSC.

#### **7.5 Co-Principal Investigator(s):**

Co-Principal Investigator (Co-PI) is a term refer to an investigator who shares scientific and administrative leadership responsibilities (granted in writing by the PI) for a trial/study with the PI.

#### **7.6 Site Investigator(s):**

Site Investigator or Site PI is a term refer to an investigator who is responsible for to take primary responsibility for the conduct of the Clinical Study at the Study Site under leadership of Principal Investigator.

#### **7.7 National Pharmaceutical Association (e.g. PPMA and Pharma Bureau):**

As per rule 13 (1) sub-rule (i), one representative of Pakistan Pharmaceutical Manufacturer Association and the Pharma Bureau, each having fifteen years of experience and expertise of conducting Clinical Trials and BA or BE studies, to be nominated by the Authority as observer for the CSC.

##### **7.7.1 Role of observers in the Committee:**

Observers can attend the meeting and listen to the conversation and can share their observations with the permission of Chairman CSC and cannot vote or otherwise officially take part in decision making. Further, they are bound to keep meeting content (agenda and other information) confidential. However, they can prepare a report regarding conduct of meeting proceedings and may submit suggestions in writing to the Chairman CSC for advancement and ease in development of research culture in Pakistan.

## **8 APPLICATION FOR CROs, BA/BE STUDY CENTER, BIO-ANALYTICAL LABORATORY, CLINICAL TRIAL SITE(S) AND / OR CLINICAL RESEARCH**

### **8.1 Who can apply:**

The application for licensing of CROs, BA/BE Study Center or Bio-Analytical Laboratory should be submitted by Head of institution or other expert authorized in this regard and application for approval/licensing of Clinical Trial Site(s) (CTS) should be from Principal Investigator (PI)

or Co- Principal Investigator (Co-PI) or by Head of institution or other expert person having at least equal or higher educational qualification in field of medicine/health care professional and should be working at the applied site. Whereas, for registration of Clinical Trial(s), the Sponsor of the trial/study (may apply if situated in the Country) or the nominated Principal Investigator by the Sponsor of the study may apply to the CSC through its Chairman / Secretary for conduct of a Clinical Research on therapeutic goods in Pakistan.

## 8.2 Where to Apply:

Applications need to be uploaded on <https://eapp.dra.gov.pk/> for online track/trace and processing. Whereas, application's (hard copies) for licensing of CROs, BA/BE Study Center or Bio-Analytical Laboratory and/or Clinical Trial Site(s) and for registration of Clinical Research in Pakistan shall be submitted to:

<p><b>The Chairman CSC / Director,</b> Pharmacy Services Division, Drug Regulatory Authority of Pakistan, Prime Minister's Health Complex, Park Road, Islamabad, Pakistan.</p>	<p><b>OR</b></p>	<p><b>The Secretary CSC (Additional / Deputy Director),</b> Pharmacy Services Division, Drug Regulatory Authority of Pakistan, Prime Minister's Health Complex, Park Road, Islamabad, Pakistan.</p>
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## 8.3 Processing fee for application(s):

Every application for licensing of CROs, BA/BE Study Center or Bio-Analytical Laboratory or Clinical Trial Site or for registration of Clinical Trial / BA/BE Study, shall be accompanied with a non- refundable processing fee, as approved and notified by the Authority vide S.R.O. 1324(I)/2024, dated 30<sup>th</sup> August 2024 or as amended from time to time. Login and afterwards fee challan can be generated online using following link:

<https://fee.dra.gov.pk/login>

After generating fee challan using above mentioned link, it needs to be paid in the nearest branch of Allied Bank of Pakistan, in the bank account of Drug Regulatory Authority of Pakistan, within due date of expiry of the challan. In case the generated challan expires, applicant may generate a new challan using same directions as previously followed.

## 8.4 Application for Licensing of Site/Center and Clinical Research:

- i. Application for licensing / approval of CROs, BA/BE Study Center or Bio-Analytical Laboratory or Clinical Trial Site shall be made on prescribed Form-I of the Bio-Study Rules, 2017. The **Form-I** along with guidance/explanatory notes attached as **Annexure-I**.
- ii. Application for registration of the Clinical Trial shall be made on prescribed **Form-II** of the Bio-Study Rules, 2017. The Form-II along with guidance/explanatory notes attached as **Annexure-II**.
- iii. Application for registration of the BA/BE Study shall be made on prescribed **Form- IIA (Amended)** of the Bio-Study Rules, 2017. The **Form-IIA (Amended)** along with guidance/explanatory notes attached as **Annexure-III**.
- iv. Application for Renewal of License of the CROs, BA/BE Study Center or Bio-Analytical Laboratory or Clinical Trial Site, shall be made on prescribed **Form-III** of the Bio-Study Rules, 2017. The **Form-III** along with guidance/explanatory

notes attached as **Annexure-IV**

- v. All Application forms are available online at the DRAP's official website ([www.dra.gov.pk](http://www.dra.gov.pk)) and can be download using link (<https://www.dra.gov.pk/publications/application-forms/#CT>) or can be obtained from the Pharmacy Services Division, DRAP.
- vi. Only one copy of completely filled form shall be submitted for each application.
- vii. The application should be submitted in writing, in the format and numbering as set out in the Application Forms. The text and diagrams must be clear and legible (use 12 pt. Times New Roman font).
- viii. The details requested in the application form should be completed briefly but in full, to enable quick review of studies. However, each section should be cross-referenced to the detail in the Trial Protocol, Investigators Brochure, and other appended documentation. Trial Protocol and Investigator Brochure should be in accordance with Section 6 and Section 7 of the latest ICH-GCP Guidelines respectively.

### **8.5 Presentation of the Application:**

The application should be bound in a single volume (or series of volumes) and the pages of the application should be numbered sequentially. The appended documents should be bound together with the application, with tabbed sections identifying each appended document.

### **8.6 Supporting Documentation:**

Complete, legible copies of key (peer-reviewed) publications (where applicable) supporting the information in the application should be attached. They should be cross-referenced from within the application text. Additional data will be requested as and when necessary.

### **8.7 Electronic/Scanned Format:**

It is directed that after preparation of application dossier and sequential page numbering, scan the complete application at 300-dpi and make a softcopy on PDF-OCR (Portable Document Format-Optical Character Recognition) format and should also be supplied on appropriate data storage device (USB/Flash Drive) and also be uploaded on e-app for online submission using following link:

<https://eapp.dra.gov.pk/>

It should be noted that along with a complete dossier, a separate folder containing a copy of separate technical documents (i.e. Protocol, IB, ICF, Pre-Clinical/Clinical Data etc.) need to be provided.

### **8.8 Language:**

Application for Licensing of site or registration of Clinical Research must be in English. All other data, particulars supporting documentations, labels and package inserts must also be in English. When supporting documentation is not originally in English, a copy of the document in its original language, accompanied by authenticated translation in English shall be submitted.

### **8.9 Confidentiality:**

The Drug Regulatory Authority of Pakistan commits to maintain the confidentiality of any

information submitted as part of a clinical trial application, supporting documents or associated correspondence.

## **9 REVIEW AND APPROVAL OF CLINICAL TRIAL APPLICATIONS: -**

### **9.1 Completeness of Application Form and Supporting Documentation:**

Applicant should submit complete application, on receipt, Division of Pharmacy Services, DRAP will screen the application within 30 working days for its completeness. Application for licensing of CROs, BA/BE Study Center or Bio-Analytical Laboratory or Clinical Trial Site(s) and registration of Clinical Trials or BA/BE Studies shall essentially be complete in the first instance if it includes all documents (as specified in Form-I, Form-II and Form-IIA (Amended) and Form-III of the Bio-Study Rules, 2017).

Applications for licensing CROs, BA/BE Study Center or Bio-Analytical Laboratory or of Clinical Trial Site(s) are thoroughly reviewed and evaluated by the Pharmacy Services Division and if there are any shortcomings observed or clarification required then a letter of shortcoming issued / shared with applicant for fulfilment and if the applications found complete then forwarded to the Chairman CSC / the CSC for constitution of inspection panel. The nominated inspection panel after inspection submit report on approved inspection checklist(s) (**Annexure-IX to XII**), which is reviewed by the Pharmacy Services Division. The Division then prepare an agenda item for the application in view of inspection panel report and its recommendations and shall be placed before the CSC for its consideration and final decision.

The complete procedure for Form-I application will be completed within 90 working days (from the date of receipt of application(s)) including issuance of licence or rejection of the application.

Whereas, all applications of Clinical Trials or BA/BE Studies are thoroughly reviewed and evaluated by the Pharmacy Services Division within 30 working days for its completeness, and if any sort of shortcomings observed or any clarification required then a letter of shortcoming issued / shared with applicant for fulfilment, and if the application(s) found complete then its **Summary Evaluation Report (Annexure-VIII)** prepared and all technical documents (Non-Clinical / Clinical Data, Investigator's Brochure, Study Protocol, Informed Consent Form and other related documents) with SER are shared with expert members of CSC for technical evaluation and comments if any. Thereafter, agenda items (i.e. Summary Evaluation Report with Review Report of Experts) of applications shall be placed before the CSC in its upcoming meeting for the consideration and final decision.

The complete procedure for Form-II and Form-IIA (Amended) application(s) will be completed within 90 working days (from the date of receipt of application(s)) including grant of registration or rejection of the application.

### **9.2 Application Reference Number:**

When an application submitted/received online through e-app <https://eapp.dra.gov.pk/>, a reference/file number/tracking number will be allotted and this reference number must be stated in all future correspondence concerning the application.

### **9.3 Supplementary Information and Updates:**

Any new information available for the product such as adverse effects, changes in formulation



or manufacturer for the active ingredients or finished products must be reported to the DRAP. If changes such as protocol amendments, informed consent form updates and additional trial sites are made, DRAP must be immediately informed. The DRAP may request for further supplementary data or documentation whenever appropriate.

In case additional quantity of study medication(s), additional trial site(s), additional new product, additional manufacturing site/re-packer, additional port of entry, and change of applicant, extension of product's shelf life or a new protocol, that should be in accordance with Section 6 of the ICH-GCP guidelines, is required. An application for amendments along with prescribed processing fee must be made where the Sponsor/PI will need to fill in the relevant section where changes applied.

#### **9.4 Expert's Review:**

Technical documents (Non-Clinical / Clinical Data, Investigator's Brochure and Study Protocol or any other related document(s)) of every Clinical Research application along with Summary Evaluation Report will be shared electronically (through email) for technical evaluation / review.

The initial review by the CSC members or designated/nominated experts may result in queries that need to be answered by the applicant. The CSC member's / expert reviewers will not have direct contact with the applicant and all correspondence should be directed through Pharmacy Services Division, DRAP only.

After evaluation each expert member will submit a review report regarding their relevant expertise. After receipt of review reports / comments (if any) from all experts the Summary Evaluation Reports (**Annexure-VIII**) prepared by the Division according to expert's review report and placed before CSC for deliberations, discussion and final decision.

The Clinical Research application(s) if required, may be sent for review to the experts designated / nominated / Co-Opted by the Clinical Studies Committee (CSC) or by the Authority. There will be confidentiality agreement with the reviewers and the Committee members to ensure that the content of the research application(s) remains confidential.

The CSC member's / expert reviewers will generate either a review report or share their opinion during the CSC meeting along with Summary Evaluation Report as an agenda item.

#### **9.5 Approval of Clinical Research Applications:**

The Clinical Studies Committee (CSC) shall be responsible for evaluation and approval of the application, if the application is complete and deems fit.

The Clinical Studies Committee (CSC) may approve or may reject the application and specify the reasons for rejection. Approval will be dependent on completeness of application and its prior approval by ERC/IRB and the National Bio-ethics Committee.

The decisions of the Clinical Studies Committee (CSC) will be communicated to the applicants in writing, by the Secretary CSC or any nominated officer(s) by Director after finalization and approval of minutes of the CSC meeting.

In case of rejection, the applicant may appeal before Appellate Authority and provide additional information where applicable and whenever required.

#### **9.6 Reliance in Clinical Research decisions, reports or information from other NRAs or SRAs: -**

As per Rule 13 (8), the CSC shall also consider relevant clinical trial decisions, reports or

other information from Reference Regulatory Authorities (RRAs) and regional or international bodies like WHO, ICH and others. Any application for approval or registration of Clinical Research will not undergo in the assessment process, if the same at any stage, has already been rejected, suspended or put on hold due to any reason, in ICH member countries or stringent regulatory authorities and shall be rejected during the process of screening.

Further, if applicant support or produce favorable decisions of Stringent Regulatory Authorities (SRAs) and regional or international bodies like WHO, ICH and others, for submitted application for Clinical Research, it will benefit the approval process of the application.

The DRAP developed guidelines “*Reliance Mechanism in Regulatory Processes*” for reliance and consideration of relevant decisions for Clinical Research, reports or other information as provided under Rule 13 (8) of the Bio-Study Rules 2017. The guidelines available online on DRAP’s official website:

<https://www.dra.gov.pk/publications/guidelines/pharmacy-services/>

List of approved Reference Regulatory Authorities (RRAs) and international / regional organizations is as follows:

Sr. No.	Country	Reference Regulatory Authority
1.	USA	Food and Drug Administration (FDA)
2.	Canada	Health Canada
3.	Australia	Therapeutic Goods Administration (TGA)
4.	Japan	Pharmaceuticals and Medical Devices Agency (PMDA)
5.	UK	Medicines and Healthcare Regulatory Agency (MHRA)
6.	France	National Agency for the Safety of Medicine and Health Products (ANSM)
7.	Germany	Federal Institute for Drugs and Medical Devices
8.	Netherlands	Medicines Evaluation Board
9.	Switzerland	Swiss medic
10.	Austria	Austrian Agency for Health and Food Safety
11.	Denmark	Danish Medicines Agency
12.	Sweden	Swedish Medical Products Agency
13.	Norway	Norwegian Medicines Agency
14.	Belgium	Federal Agency for Medicines and Health Products
15.	Finland	Finnish Medicine Agency
16.	Italy	Italian Medicine Agency (AIFA)
17.	Ireland	Health Products Regulatory Authority (HPRA)
18.	Iceland	Icelandic Medicine Agency
19.	Spain	Spanish Agency for Medicines and Health Products
20.	Europe	European Medicines Agency (EMA)
21.	WHO	World Health Organization

If applicant has any information regarding relevant CT decisions, reports or information from other NRAs or RRAs, so it may be attached with application, so, may be considered by the CSC.

## 9.7 Import of Investigational Products (IPs)

Applicants after getting approval for applied Clinical Research may apply for an import license (for same quantities as mentioned in the Clinical Research application) on Form-4 of the Drugs (Import and Export) Rules 1976 if importation of IPs is required for the research.

The Form-4 along with all required documents and prescribed fee may be submitted to respective field offices of the DRAP.

The Approval for importation of Investigational Products (IPs) will be dealt / approved by Quality Assurance and Lab Testing (QA and LT) Division of DRAP, after registration / approval of the Clinical Research, under the Bio-Study Rules 2017.

After fulfilment of all codal formalities of Form-4 of the Drugs (Import and Export) Rules 1976, import license on Form-6 of the Drugs (Import and Export) Rules 1976 will be issued with a two (02) years validity.

If duration of Clinical Research is more than two (02) years, then applicant may renew import license by submitting Form-4 along with all required documents and prescribed fee under the Drugs (Import and Export) Rules 1976, to respective field offices of the DRAP.

## **9.8 Post-trial review**

It is mandatory under the section 8 (3) and (6) of the Bio-Study Rules 2017, that the Final Report/Clinical Study Report for each Clinical Research conducted in Pakistan should be submitted to the DRAP for consideration of the CSC.

## **10 NON-ROUTINE PROCEDURES FOR CLINICAL TRIALS IN PUBLIC HEALTH EMERGENCY**

In Situation of public health emergency, routine procedures for Clinical Trial application may not be followed. Public Health Emergencies is defined as “an emergency need for health care [medical] services to respond to a disaster, significant outbreak of an infectious disease, bioterrorist attack or other significant or catastrophic event”.

In case of Clinical Research, as per Rule 7(10) of the Bio-Study Rules 2017, the CSC may process the application of a Clinical Research on fast-track basis if it deems necessary to do so in the best public interest or in public health emergency cases (e.g. COVID-19 pandemic etc.), to save the precious lives of human subjects, after recording the reason therefore.

In any health emergency condition as mentioned above (e.g. COVID-19 pandemic etc.) or in the best of public interest, the Chairman CSC may call CSC meeting exercising his power conferred in Rule 13(7) of the Bio-Study Rules 2017, for fast track processing of the application without initial scrutiny and Summary Evaluation Report by the Pharmacy Services Division and the CSC may waive the requirement for auxiliary documents (i.e. non clinical data, details regarding participating countries, sample label of investigational product or undertaking on affidavit), if CSC feels it deems fit.

If applicant want to apply a Clinical Research for non-routine/health emergency, so may inform accordingly in the application cover letter, along with reasoning/justification letter for fast track consideration of application by the CSC.

## **11 PROCEDURES FOR PARALLEL PROCESSING OF APPROVAL OF SITE(S) / CENTERS AND CLINICAL RESEARCH/TRIAL**

If applicant want to apply a Clinical Research along with new Site(s) (which are not yet approved by the DRAP), so, may submit separate application(s) for Site(s)/Center(s) and Clinical Research mentioning the reasons in research application and a request for parallel processing of research/trial and site(s) applications. All other prerequisites and processing will be the same as mentioned above. Whereas, in parallel processing case research approval will



be subject to the approval of applied site(s) remaining procedures will be same for both applications.

## **12 PARALLEL SUBMISSION AND PROCESSING OF CLINICAL RESEARCH/TRIAL APPLICATION TO NATIONAL BIOETHICS COMMITTEE AND THE DARP**

If applicant want to apply a Clinical Research in-parallel to the National Bio Ethics Committee and to the Pharmacy Services Division-DARP, he/she can submit application with a request for parallel processing. Whereas, the application will be placed before CSC after submission of NBC approval (for the same Protocol submitted to the DRAP), and all other prerequisites as required and mentioned in respective Form and Checklists or asked to submit after evaluation by the Pharmacy Services Division.

## **13 TIMELINES AND PROCESS FLOW FOR ROUTINE, NON-ROUTINE AND PARALLEL PROCESSING OF APPLICATIONS**

All applications received under the Bio-Study Rules, 2017 are processed on the basis of FIFO. Upon receipt of an application, it is initially scrutinized/evaluated within 30 working days and if there are any deficiencies / shortcoming in the application, so, a shortcoming / clarification letter shall be communicated to the applicant for fulfilment, within 05 working days and also shared electronically to save the time, after getting approval from the Chairman CSC.

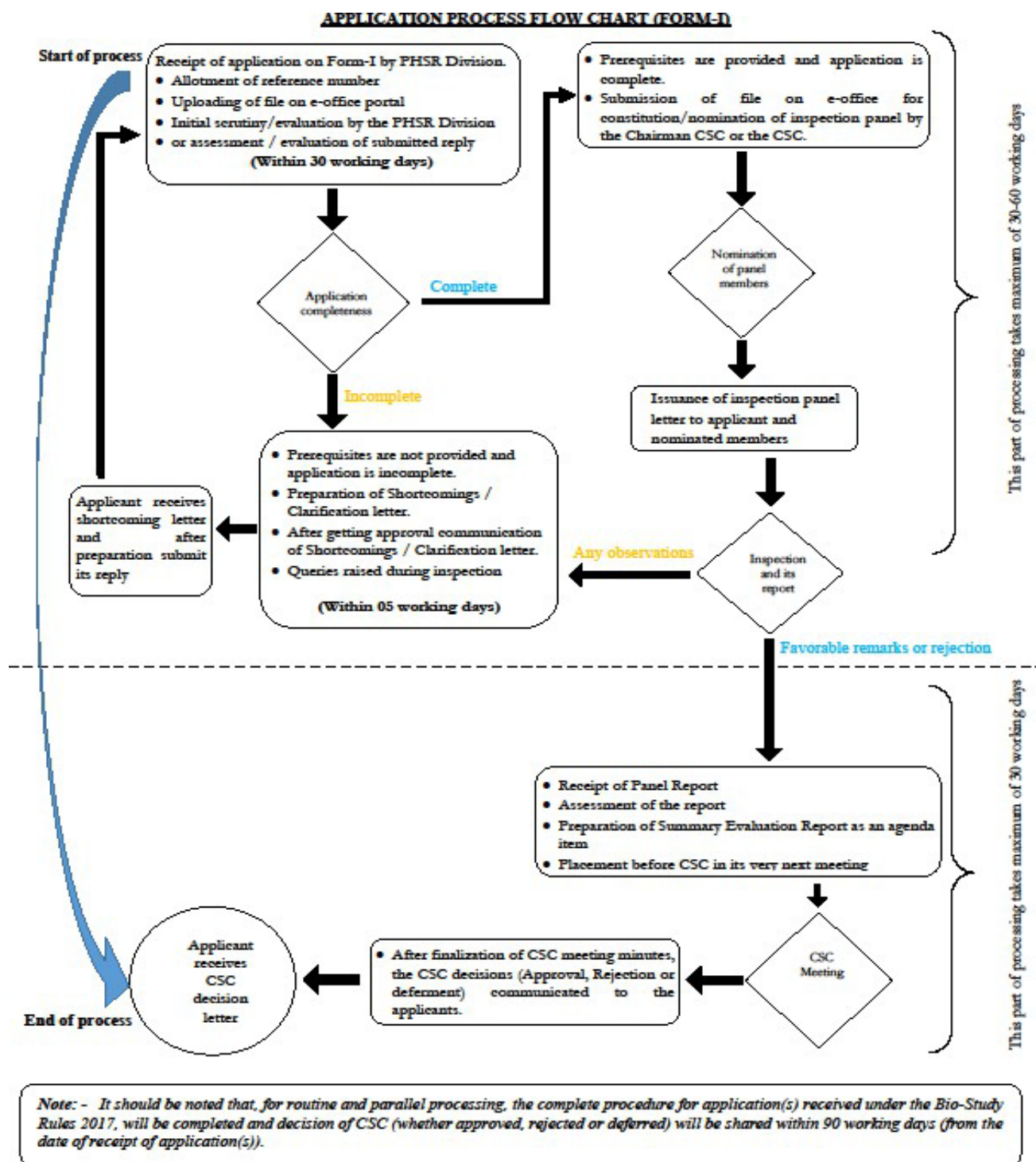
Upon receipt of shortcoming application again evaluated by the Pharmacy Services Division as per approved SOPs within stipulated timelines (i.e. 15-20 working days).

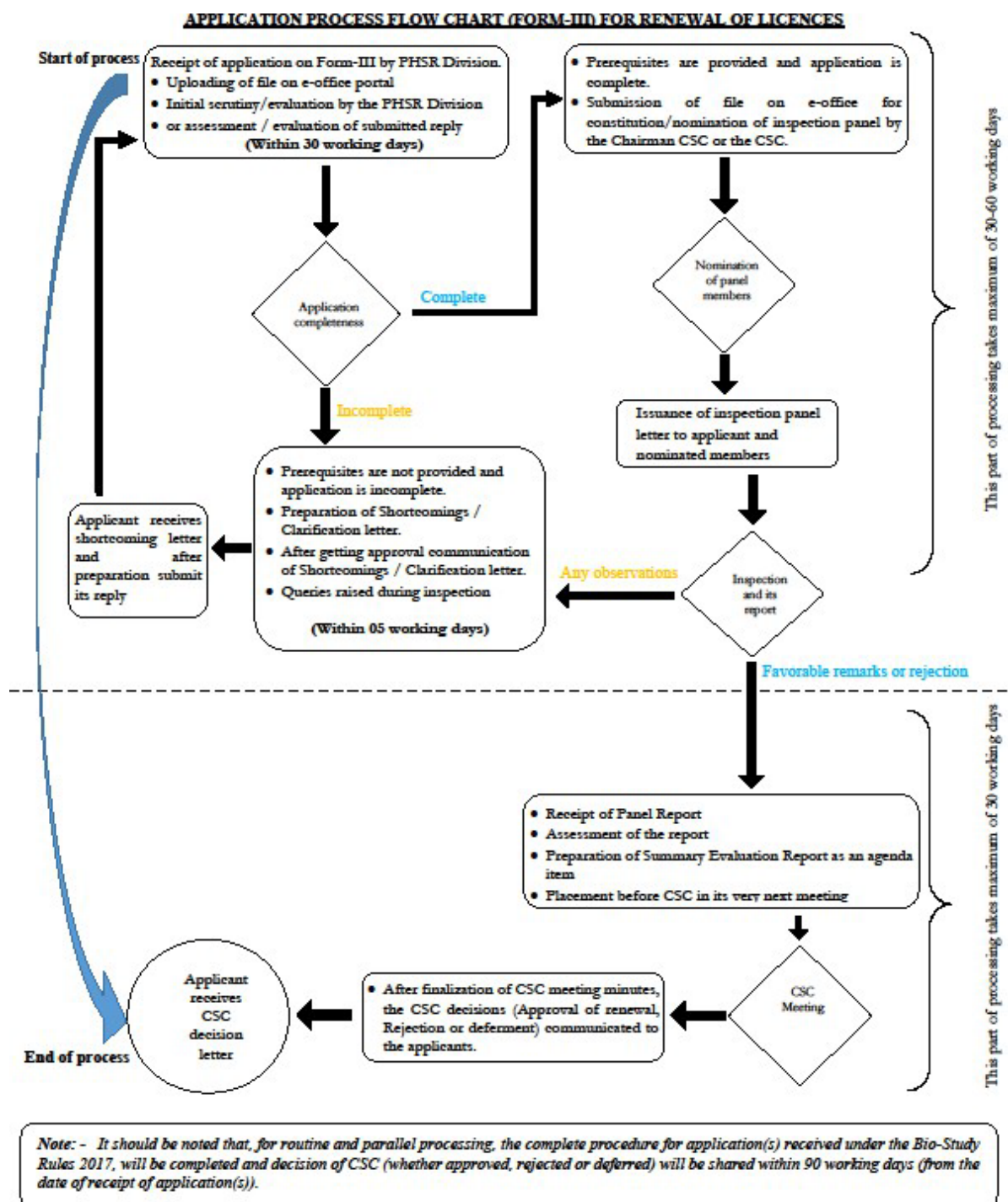
After consideration, decision and finalization of the CSC meeting minutes, the CSC decisions (Licenses, Registration letter, Rejection letter or any other decisions) communicated to applicants within 10-15 working days.

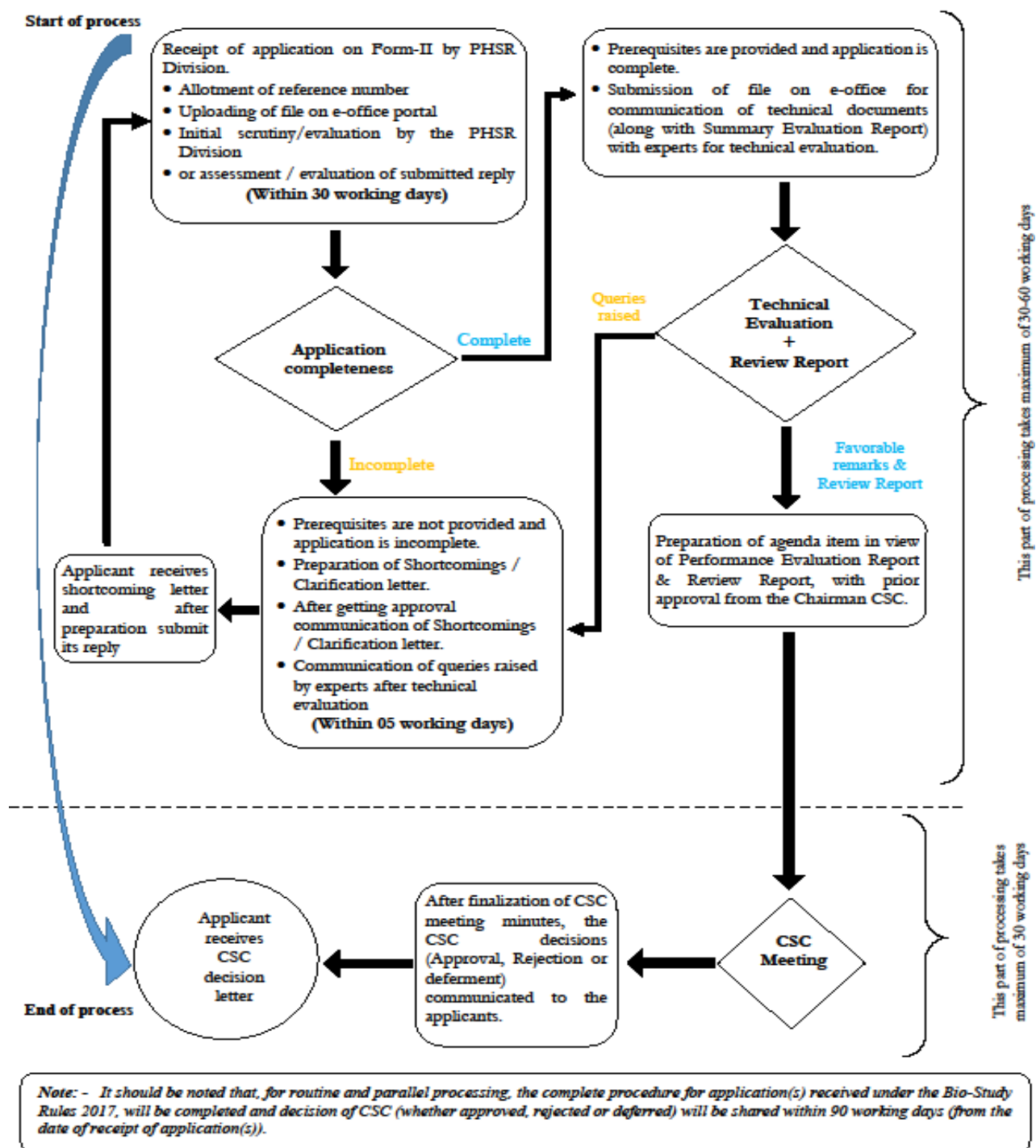
For routine and parallel processing, the complete procedure for application(s) received under the Bio-Study Rules 2017, will be completed and decision of CSC (whether approved, rejected or deferred) will be shared within 90 working days (from the date of receipt of application(s)).

In case of any non-routine or Public Health Emergencies (e.g. COVID-19 pandemic etc.), all application related to the Public Health Emergencies will be processed as soon as possible or within seven (07) working days and if there are deficiencies / shortcomings in the application will be communicated to applicant within 03 days and also shared electronically to save the time. After fulfilment / completion of application, the Chairman CSC may call meeting of the CSC for urgent disposal of applications related to health emergencies. After consideration, decision and finalization of the CSC meeting minutes, the CSC decisions (Licenses, Registration letter, Rejection letter or any other decisions) communicated to applicants within 07 working days. It should be noted that, for non-routine/Public Health Emergencies, the complete procedure for application(s) received under the Bio-Study Rules 2017, will be completed and decision of CSC (whether approved, rejected or deferred) will be shared within 40 working days (from the date of receipt of application(s)).

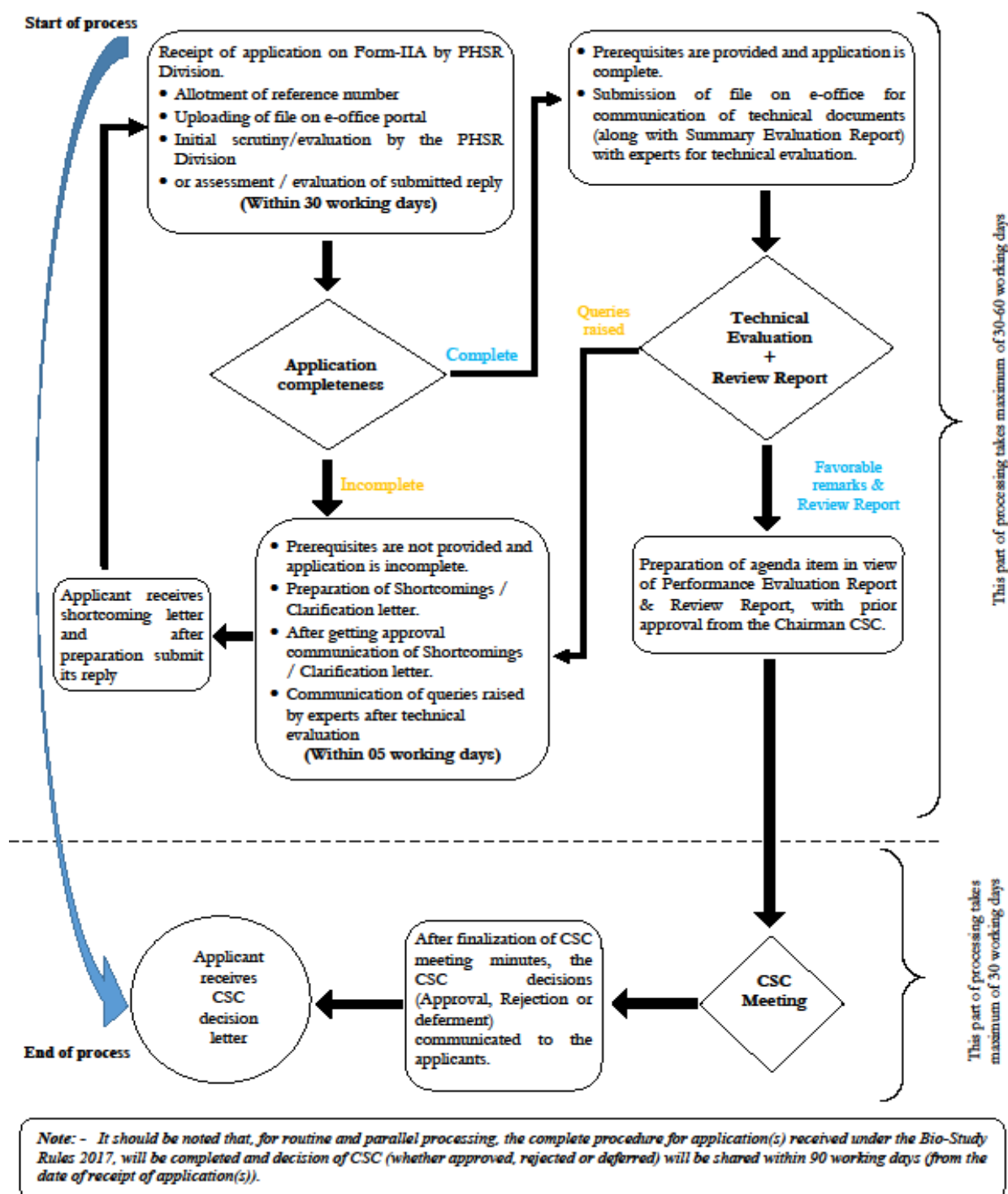
Application wise Process Flow Charts in PDF format are given below and can be maximize by double click on it:





**APPLICATION PROCESS FLOW CHART (FORM-II) (REGISTRATION OF CLINICAL RESEARCH)**



**APPLICATION PROCESS FLOW CHART (FORM-IIA) (REGISTRATION OF BA/BE STUDY)**

## **14 ETHICAL APPROVAL OF THE CLINICAL RESEARCH ON THERAPEUTIC GOODS: -**

All applicants need to provide ethical clearance certificate(s) before approval by the CSC, as it is mandatory under Rule 9 of the Bio-Study Rule 2017, So, ethical approval of the Clinical Research/Studies Protocol, Protocol Amendments and of the methods and material to be used in obtaining and documenting informed consent of the trial subjects, is required to be sought from Institutional Review Committee (IRC)/ Ethics Review Committee (ERC) / Institutional Review Board (IRB) and National Bio-Ethics Committee (NBC), Islamabad.

### **14.1 Institutional Review Committee (IRC)/ Independent Ethics Committee (IEC)/ Ethics Review Committee (ERC) / Institutional Review Board (IRB):**

As per rule 9 of the Bio-Study Rules 2017, IRC/ERC/IRB is an independent body, constituted by medical professionals and non-medical members, whose responsibility is to verify that the safety, integrity and human rights of the subjects participating in a particular trial are protected, thereby providing public reassurance. IRC/ERC/IRB should be constituted and operated so that the suitability of the investigators, facilities, protocols, the eligibility of trial subject groups, and the adequacy of confidentiality safeguards may be objectively and impartially reviewed independently of the investigator, sponsor, and relevant authorities.

The IRB should consist of following number of members, who collectively have the qualifications and experience to review and evaluate the science, medical, legal aspects and ethics of the proposed trial. The IRB should include: -

- (a) At least five members;
- (b) At least one member whose primary area of interest is in a non-scientific area; and
- (c) At least one member who is independent of the institution or trial site.

No person involved in a clinical trial study should be part of IRB and independent ethics committee or NBC. The funding and source of funding of IRB and its members be clearly defined and documented.

The IRB shall be responsible for the periodic review of the clinical trial study, and submission of their reports to the CSC. All Clinical Trial Site(s) should have their own independent Institutional Review Committee (IRC), Ethics Review Committee (ERC) or Institutional Review Board (IRB) To promote uniformity in content and format across the country, a standardized template for IRB / ERC / IRC notifications is attached for adaptation by IRB / ERC /IRC notifying bodies in issuing consistent and comprehensive notifications

Template for IRB/ERC Members Composition Notification (**Annexure-XIV**)

### **14.2 National Bio-Ethics Committee (NBC).**

NBC is the major and only official body to uphold the bioethical principles in all sectors of health- care in the country. The purpose of NBC is to safeguarding the dignity, rights, safety and well- being of subjects who seek assistance to safeguard their health, be their treatment, as the participants in research projects in the country, as teachers and the taught, and publications in the medical field. NBC is expected to take care of the principle of justice in the equitable distribution of resources for health delivery.

As per rule 9 of the Bio-Study Rules 2017, it is mandatory for the applicants who are willing to conduct clinical trials or studies, to seek prior approval from National Bioethics Committee (NBC) of Pakistan.

## 15 AMENDMENTS AND URGENT SAFTY MEASURES: -

After approval of a Clinical Research by the CSC, the Sponsor itself or through its Principal Investigator may contact and apply for approval of amendments as needed to ensure that the clinical investigations conducted according to protocols included in the research application. Sponsors/PIs are directed to submit protocol amendments for new protocols or changes to existing protocols before implementation of the respective changes. When several submissions with minor amendments are expected within a short period, Sponsors/PIs are encouraged, to the extent feasible, to include all amendments in a single submission.

As per Rule 8 (10), no amendments in the approved protocol of Clinical Research can be made without seeking prior approval from the CSC or the Chairman CSC as the case may be. All amendment applications should be in accordance with Section 6 of the ICH-GCP guidelines as the DRAP adopted ICH-GCP Guidelines under Rule 15 of the Bio-Study Rules 2017.

If the amendment is judged (by Principal Investigator) as urgently necessary to protect life or well-being of trial participants or the community, the change may be effective immediately, and the investigator must inform the IRB / IEC / IRC / ERC, NBC and DRAP within 48 hours by telephone/electronically followed by a written full explanation.

If the amendment may affect the safety of the trial participants (e.g. changes to dose, regimen, concomitant medication, monitoring, etc.) the amendment must be submitted in full, and approval from DRAP, NBC, and IRB / IEC / IRC / ERC obtained prior to implementation.

If the amendment is unlikely to impact on participant safety (e.g. change of investigator (except Principle Investigator), end point assay, laboratory, statistical analysis, etc.) the full detail of the change must be submitted in writing, and the change may be implemented 30 working days after receipt of the amendment by the DRAP, if no notification to the contrary is received by the applicant within that period.

Any specific technical information referenced in amendment application as already submitted to the DRAP in the original research application is expected to be identified by name, reference number, volume, page number, and date of submission. The amendments are generally classified into two categories “Major/Substantial” and “Minor/Non-Substantial” amendments.

### 15.1 Classification/Categorization of Amendments:

Classification/Categorization of Amendments for Clinical Research	Major / Substantial	Minor / Non-Substantial
Change of main objective	X	
Change of primary or secondary endpoint	X	
Use of new measurements (methods) for the primary endpoint	X	
Change in the definition of the end of the trial	X	
Addition of a trial arm or placebo group	X	
Change of inclusion / exclusion criteria	X	
Changes in Informed Consent Forms (Major Changes)	X	
Reducing number of follow-up visits	X	
Change of study designs with impact on statistical analysis or the risk/benefit assessment	X	
Change of Sponsor or the Sponsor's legal representative	X	
Change of IPs source	X	

Change of dosing of IPs	X	
Change of mode of administration of IPs	X	
Revocation or suspension of the IP's Marketing Authorization	X	
Changes in the manufacturing process and/or specifications of an active substance /IPs	X	
Change of the Reference Safety Information (RSI) during the conduct of a clinical research.	X	
Change of PIs	X	
Change of Co-PIs		X
Change of Site Investigator		X
Addition of Clinical Trial Site in DRAP approved trial		X
Change/updates of the investigator's brochure (unless there is a change to the risk/benefit assessment for the trial);		X
Changes in Informed Consent Forms (Minor/Typographic Changes which not affect participants or trial design)		X
Changes to the patient information (CRF, Pamphlets etc.)		X
Addition of a CSC approved study site and investigators		X
Change of contact details of the applicant		X
Change of CRA (Clinical Research Associate) for monitoring		X
Change of CRO by Sponsor		X
Closing of a Study Site (Due to inactivity)		X
Changes in Case Report Forms		X
Increase or decrease in duration of the research, provided that: i. the exposure to treatment with the IPs is not extended, ii. the definition of the end of the trial is unchanged, and iii. monitoring arrangements are unchanged		X
Change in the number of clinical trial participant's distribution per trial site (if the total number of participants in the Country concerned is identical/same)		X
Insignificant increase/ decrease in view of the absolute number of participants		X
Minor clarifications to the protocol		X
Correction of typographical errors		X
Shelf life extensions of IPs according to protocol		X
Changes in funding arrangements		X
Changes in the logistical arrangements for storing or transporting samples		X

All amendment applications should be accompanied with all following requisite documents/information:

- Application on Sponsor/PIs institution/organizational letter head.
- Details of amendment types for which applied.
- A table in a covering letter with detail of all amended parts and its justification.
- The reasons for the amendments must be provided.
- The possible consequences for participants already enrolled must be described (if any).
- Where an amendment applied for Protocol, Informed Consent Form or Investigator's Brochure its amended copy along with change control copy need to be attached.
- IRB / IEC / IRC / ERC approval for applied amendments.
- NBC approval for proposed amendments, needs to be provided before the CSC approval.
- Prescribed processing fee in amendment/miscellaneous head as applicable.



The Pharmacy Services Division, DRAP will review the amendment application together with supporting approval. All Major/substantial amendments will be referred to Clinical Studies Committee (CSC) for expert review and consideration for approval/notification of the amendment(s) whereas, all Minor / Non-Substantial amendments shall be forwarded to the Chairman CSC for its consideration, decision and notification.

Amendments will be processed within 30 working days whereas, Major amendments shall be placed before forthcoming CSC meeting for consideration and decision

## **16 AUDIT OR INSPECTION FOR LICENSING OF CRO, CTS, BIO-ANALYTICAL LABORATORY OR BA/BE STUDIES CENTERS: -**

An inspection or audit of CROs, CTS, Bio-Analytical Laboratory or BA/BE Studies Center may be conducted by the Experts nominated by the Chairman CSC or by the Clinical Studies Committee (CSC). The aim is to evaluate the suitability and acceptability of research related facility.

The CSC developed and approved its inspection checklists for each (CROs, CTS, Bio-Analytical Laboratory or BA/BE Studies Center) type of license application.

i.	Inspection Checklist for CROs	Annexure-IX
ii.	Inspection Checklist for Clinical Trial Sites	Annexure-X
iii.	Inspection Checklist for Bio-Analytical Laboratory	Annexure-XI
iv.	Inspection Checklist for BA/BE Studies Center	Annexure-XII

## **17 AUDIT OR INSPECTION FOR GCP COMPLAINE: -**

An inspection or audit of Clinical Research may be conducted (Before, During and/or After research) by the Experts nominated by the Chairman CSC, Clinical Studies Committee (CSC) or the DRAP (GCP Inspectors). The aim is to evaluate the suitability of research facility and verification of adherence and compliance to the approved research protocol, legislation, Good Clinical Practice (GCP) principles and practices as elaborated in the latest version of ICH-GCP Guidelines, the Bio- Study Rules, 2017 and its guidelines. Further, acceptability of clinical data submitted to DRAP. The nominated experts or GCP inspectors of the Authority may contact the PI/Site PI or Sponsor (as required) for the finalization of schedule of inspection when required, an official letter for GCP inspection by nominated experts/inspectors shall also be communicated by the Pharmacy Services Division in this regard.

- Inspection of Clinical Research at its approved site(s) may be conducted by panel or team nominated by the Chairman CSC or by the CSC before and after approval of the site.
- Such inspections may be before commencement of the trial, or at predetermined intervals, or may be on the direction of the Clinical Studies Committee (CSC), responsible for clinical trial review.
- However, in the case of complaints or reports of unexpected adverse reactions, inspections may take place at short notice and may be unannounced.

The Inspections will include but not be limited to following points:

- The facilities and staff used for the trial, as approved by the Clinical Studies

Committee (CSC) under the Bio-Study Rules 2017.

- ii. Compliance with the approved Protocol.
- iii. All amendments to the Protocol, which may have been approved.
- iv. Accurate, complete and current records according to the Protocol.
- v. Verifying that Serious Adverse Events are reported as required by the Protocol.
- vi. Verifying those inspections intended to monitor and audit the trials are conducted as required by the Protocol and the reports are available for inspection.

The CSC/DRAP conduct all GCP inspections as per “***Guidelines for Conduct and Reporting of GCP Inspections***”, available online on DRAP official website for preparation and guidance.

All GCP Compliance inspection reports shall be placed before CSC for review, consideration and issuance of guidance, directions or decision if any.

## **18 REPORTS AND FINAL REVIEW: -**

### **18.1 Reports of Serious Adverse Events:**

All applicants informed that, as per Rule 8(5) any adverse reaction shall be reported immediately to the Pharmacy Services Division-DRAP. The PI shall report to IRB / IEC / ERC / IRCs and the Sponsor with copies to Pharmacy Services Division, DRAP all serious adverse events (SAEs), both expected or unexpected, as soon as possible but not later than seven (07) calendar days upon receiving notice of such event.

The Sponsor shall bound the Principal Investigator to report all Serious Adverse Events (SAEs) immediately to him except for those the research protocol identifies as not requiring immediate reporting. The immediate report shall be followed by detailed, written reports. The immediate and follow-up reports shall identify subjects by unique code numbers assigned to the latter.

Adverse events and laboratory abnormalities identified in the protocol as critical to safety evaluations shall be reported to the Sponsor according to the reporting requirements and within the time periods specified in the protocol.

For reported deaths of a subject, the Principal Investigator shall supply the Sponsor and the Ethics Committee and the Authority with any additional information requested.

The Sponsor shall keep detailed records of all adverse events which are reported to him by the PIs or Site-Investigators. These records shall be submitted to the Pharmacy Services Division/CSC addressing the Chairman CSC / Secretary CSC in connection to the Clinical Research report.

The Sponsor and/or PI shall report domestic adverse drug reactions and adverse events occurring during the Clinical Trials/Research to the Pharmacy Services Division / CSC as per following timelines, namely; -

- (a) the Sponsor and/or PI shall ensure that all relevant information about domestic Suspected Unexpected Serious Adverse Reactions (SUSAR) occurring in clinical investigation, that are fatal or life-threatening are recorded and reported as soon as possible, and in any case no later than seven (07) calendar days after knowledge by the Sponsor and/or PI of such a case, and the relevant follow-up information is subsequently communicated within additional eight (08) calendar days;
- (b) all other domestic suspected unexpected serious adverse reactions

(SUSARs) that are not fatal life-threatening shall be reported as soon as possible but within a maximum of fifteen calendar days of first knowledge by the sponsor and/or PI; and Non-serious AEs or ADRs shall not be reported on expedite basis but shall be included in the periodic reports.

The Sponsor and/or PI shall submit DSUR as per International Council on Harmonization (ICH-E2F) format for as long as the Sponsor conducts clinical trials/research in Pakistan with the investigational drug. For the ease of manufacturer or drug registration holder or sponsor, the DSUR shall be submitted for all ongoing clinical trials.

The sponsor is conducting or has completed during the review period including, -

- (a) Clinical Trials conducted using an investigational drug i.e., human pharmacology, therapeutic exploratory and therapeutic confirmatory trials (Phase I – III);
- (b) Clinical Trials conducted using marketed or registered drugs / therapeutic goods in approved indications, i.e., therapeutic use trials (Phase IV);
- (c) Other therapeutic use of an investigational drug (e.g., expanded access programs, compassionate use programs, particular patient use, single patient investigational new drugs / therapeutic goods, and treatment investigational new drugs / therapeutic goods); and
- (d) Comparability trials conducted to support changes in the manufacturing process of the drug.

The DSUR shall be submitted annually no later than sixty calendar days from the DSUR's DLP. The DLP of the DSUR should be based on Initial Blinding Date (IBD).

If the investigational drug has received accelerated approval or registration, and clinical trials continue or are initiated, both a PBRER (as per ICH-E2C (R2) format) and a DSUR should be prepared in accordance with ICH-GCP Guidelines. The Sponsor shall change the DSUR's, DLP to coincide with the IBD so that the DSUR and the PBRER can be synchronized. In synchronizing the DLP for the DSUR and PBRER, the period covered by the next DSUR should be no longer than one year.

When submission of an annual DSUR report is no longer required, the sponsor should indicate that the final DSUR serves as the last annual report for the investigational drug. The sponsor should also indicate whether or not clinical trials are continuing elsewhere.

Additional follow up information should be made available to Pharmacy Services Division, DRAP as soon as possible, but in any case, not later than fifteen (15) calendar days.

## **18.2 Progress and Final Trial Reports/Clinical Study Reports:**

All applicants informed that, as per Rule 8 of the Bio-Study Rule 2017, progress reports (quarterly) and final results/Clinical Study Reports of the clinical trial at the completion of the investigation must be communicated to the CSC. In the case of trials lasting for more than 6 months, an interim report shall be submitted at 6 months' intervals or as may be directed by the CSC or Pharmacy Services Division, DRAP. The interim report shall include the number of patients so far treated, number and type of Serious Adverse Events (SAEs) reported, number of discontinued patients and the reasons for discontinuation. To promote uniformity in content and format across the country, a standardized template/format for Progress Report and Clinical Study Reports are attached. These templates are intended to guide and support all

stakeholders for consistent and comprehensive reports:

Template for Quarterly Progress Report (**Annexure-XV**)

Template for Clinical Study Report (**Annexure-XVI**)

Progress or safety reports submitted by IRB/ERC, Sponsor, CROs or Principal Investigators shall be presented before CSC and decisions taken by the CSC shall be communicated. All progress or safety reports shall be stored with primary/main application file of the Clinical Trial.

The PI or sponsor shall submit an End of Study Summary Report pertaining to the sites conducting the trial to DRAP, within 3 months from the Last Patient Out (LPO)/ Last Patient Last Visit (LPLV) date.

In case of a multi-center trial within the country, with different end times, a report on each site shall be submitted before the end of the 3<sup>rd</sup> month from the last subject out. A Final Report/Clinical Study Report on the trial findings shall then be submitted not later than 3 months of completion of the whole trial. Further, ADRs/SAEs, and Progress/Final reports can be shared through official email ([CT\\_AE.reporting@dra.gov.pk](mailto:CT_AE.reporting@dra.gov.pk)). Whereas, hardcopy will still need to be shared with detailed report.

### **18.3 Sub-Committee of CSC for review of ADR/AE/SAE/SUSAR/DSUR, Progress / Final Report or Clinical Study Reports (CSR):**

The CSC will nominate a sub-committee of experts who will be responsible for review of ADR/AE/SAE/SUSAR/DSUR, Progress / Final Report or Clinical Study Reports (CSR) with assistance of concerned assessor/evaluator along with the Secretary and Chairman CSC for deliberation, decision and for issuance of guidance and directions.

This Sub-Committee will operate under supervision of the Chairman CSC and will prepare its report regarding submitted ADR/AE/SAE/SUSAR/DSUR, Progress / Final Report or Clinical Study Reports (CSR) and place before the CSC for final deliberation, decision and for issuance of guidance and directions.

### **18.4 Product Accountability and procedure for Destruction/Disposal of unused IPs:**

All clinical trials materials and Investigational Products (IPs) that have been used, partially used, unused, or destroyed but are no longer required for the study, including expired clinical trials IP, returned by the subjects, must be collected from all clinical study sites (if any), reconciled and disposed of appropriately, in accordance with current guidelines and legal requirements. The IPs not required for the clinical trial/ study must be returned to the Sponsor or destroyed (as the case may be) through suitable drug disposable company after written permission by the Sponsor. In any of aforementioned case, according to Rule 8(13) of the Bio-Study Rules 2017, the destruction of IPs should be carried out after seeking approval and directions (if any) from the CSC / the Chairman CSC through Pharmacy Services Division. The Sponsor/Principal Investigator will submit an application along with IPs reconciliation / accountability / Utilization report, within 3 months from the Last Subject Out date and prescribed processing fee in miscellaneous head, to the Chairman CSC for nomination of panel for verification of IPs reconciliation and observance of IPs destruction.

#### **18.4.1 Procedure(s) for IPs Reconciliation and Destruction:**

The destruction of IPs is the responsibility of the Sponsor and the Principal Investigator. All

Site Investigators should reconcile the IPs with the help of their study team under supervision of Study monitor or Clinical Research Associate (CRA), and will return to the country Principal Investigator as per reconciliations sheet. The country Principal Investigator after verification and final reconciliation will make a request to the DRAP along with IPs reconciliation sheet along with Drug Import License(s) (DIL) and related documents for IPs destruction/return to the Sponsor as per written instructions of the Sponsor. The Clinical Studies Committee (CSC) / the Chairman CSC will decide the application and allow for return / re-export of IPs to the Sponsor or will nominate expert panel for physical verification of IPs reconciliation and observance of destruction of IPs or may give any other directions as deem fit.

#### 18.4.2 Storage of IPs for disposal:

All returned IPs and materials (empty or partially empty containers of IPs etc.), no longer required for the study, including IPs not dispensed and/or expired, must be stored in a specifically allocated area of pharmacy (designated for storage of IPs only) that is access controlled and not accessible to unauthorized persons. Returned IPs and clinical trial material must also be stored separately from unused IPs available to be dispensed in the trial. IPs may need to be destroyed if it is no longer required for the study and/or expired, will be kept as quarantined stock. Damaged containers of clinical trials materials and/or IPs must be kept in a sharp colored bin or a yellow clinical waste bag on site for destruction. Returned and unused IPs should be stored in the original containers. Before sending request to Pharmacy Services Division/CSC for return/destruction of IPs, any discrepancy in quantity, wastage etc., must be investigated, satisfactorily explained and reconciliation accepted (by the Sponsor) for each IP involved in the clinical trial. All accountability logs related to the IPs being returned/destroyed must be updated and also informed to CSC/Pharmacy Services Division accordingly.

#### 18.4.3 Re-Export/Returning IPs to the Sponsor for Destruction:

The Sponsor may arrange to remove all un-used/returned and/or expired IPs at end of the clinical trial/ study. This is usually done by the Study Team; Study Monitor/Clinical Research Associates may help in supervision of reconciliation of the IPs record. The IPs can be returned to Sponsor after permission of the CSC/the Chairman CSC. The manner of shipment of IPs to be returned must be shared by the Sponsor and will be followed by the PI. The IPs need to be returned, should be packed according to requirements defined by the Sponsor and should be documented. The shipment must have mechanism of being track and traced.

#### 18.4.4 Destruction of IPs:

If the Sponsor does not require to return the IPs, then written instruction/SOP for destruction of the IPs need to be provided by the Sponsor. The PI/ Sponsor will make arrangements with a suitable drug disposal company for IPs destruction process or any other recommended process keeping in view the nature of IPs including investigational vaccines, biohazards materials etc. The IP items to be sent for destruction must be placed in an appropriate bag/container depending upon the waste type under supervision of designated person by the PI. The bag/container should be tied/sealed and marked for destruction. The patient identity (if any) must be removed from any IPs prior to destruction to maintain confidentiality. Any dispensing labels removed from the IPs must be disposed of in confidential waste.

The IPs receipt for destruction form is authorized by the PI and signed by the PI's authorized



persons handing over and collecting the package or drum having IPs. The destruction process should be witnessed by panel constituted by the CSC/ the Chairman CSC. These guidelines do not cater for radioactive substances. For such substances, the international guidelines for radioactive substances will be applied.

#### 18.4.5 Documents of IPs destruction:

All IPs sent for destruction must be recorded. The record of the IPs destruction should clearly identify:

- a. IPs purchase/ Import record with DIL and shipment clearance certificate(s).
- b. IPs reconciliation sheet with details of number of IPs received, used, un-used, partially used, returned, expired, wasted and broken/damaged IPs.
- c. Date of IPs destruction.
- d. Name/Code, strength and dosage form of the IPs.
- e. Batch numbers and expiry dates.
- f. Patients numbers involved (only if required), and
- g. The actual quantities of IPs sent for destruction.
- h. Qualification Certificate of IPs Disposal Firm.
- i. Certificate of Destruction/Incineration issued by the Disposal Firm.

The record must be signed and dated by the designated person sending the IPs for destruction, and checked by a second designated member of the relevant pharmacy for storage of IPs / clinical trials team and complete a Certificate of Destruction and any Sponsor supplied documentation for recording destruction. The destruction certificate should be witnessed/signed by panel constituted by CSC/ Chairman CSC.

The PI will submit a complete report along with above mentioned documents and IPs Destruction Certificate duly signed by the PI and DRAP's nominated officers, and/or written evidence of re- export of the unused drug supplies to country of origin (whichever applicable). This report will be placed before the CSC or Chairman as authorized by CSC, for consideration and decision and directions, if any.

#### 18.4.6 Documents of IPs return/re-export:

Application for IPs re-export to the Sponsor should be accompanied with the following documents:

- a. IPs reconciliation sheet with details of number of IPs received, used, un-used, partially used, returned, expired, wasted and broken/damaged IPs.
- b. IPs purchase / Import record with DIL and shipment clearance certificate(s).
- c. Name / Code, strength and dosage form of the IPs.
- d. Batch numbers and expiry dates.
- e. The actual quantities of IPs need to be re-export.
- f. Prescribed processing fee in Misc. head.

After receipt of application for IPs re-export, the Pharmacy Services Division only scrutinize and evaluate the application and the Chairman CSC may nominate any expert person/officer for verification of quantity and physical conditions of IPs retained/stored for re-export. After verification reconciliation report and application will be forwarded to the Chairman CSC / the CSC for consideration and decision. It should be noted that, NOC for re-export will be issued

by relevant DRAP's field office under the Drugs (Import and Export) Rules, 1976 after submission of prescribed fee, the CSC / the Chairman CSC decision letter and other prerequisites as the case may be.

#### 18.4.7 Archiving:

It is the responsibility of the Principal Investigator and the Sponsor to archive and ensure the safety of all the documents related to the trial. The license holder/applicant should inform DRAP in writing prior to destroying the documents. Documents shall be retained for a minimum period of 5 years or as per the requirement of the Sponsor, after Clinical Trial completion.

## 19 CLINICAL TRIAL REGISTRY OF PAKISTAN: -

Pharmacy Services Division, DRAP according to Rule 20 of the Bio-Study Rules 2017, shall maintaining its own clinical trial registry for approved clinical trials involving human subjects, and being conducted in Pakistan. (<https://ctr.dra.gov.pk/> )

As per Rule 20(2) of the Bio-Study Rules 2017, Clinical trial registry means an official catalog, containing publicly accessible record of approved clinical trials. Content, format and information uploaded to the database of National Clinical Trial Registry is as below:

01	Clinical Studies Name	
Title:		
Trial Acronym		
Brief Summery		
Trial Design	Allocation:	
	Intervention Model:	
	Assignment Masking:	
	Primary Purpose:	
Medical Condition		
Trial Phase		
Investigational Product		
Control No.		
Approval Date		
Duration of Trial		
Status		
Target Enrollment		
Eligibility Criteria		

Sex/Gender	
Age Group	
Approved Study Sites in Pakistan	
Participating Countries	
Sponsor	
Funder	
Global Trial Coordinator	
Global Chief Investigator	
Trial Coordinator / Principal Investigator in Pakistan	
Last Update On	

The Clinical Trial Registry of Pakistan (CTRP) is a primary registry, which may in future, be linked to the registry network of the International clinical trials registry platform of the WHO (WHO- ICTRP). It shall be a not-for-profit registry, with free and open access to researchers, clinicians, and the general public.

The PI will be responsible for uploading of trial data on CTRP or by designated person, within 15 working days, after approval of Clinical Research by the CSC.

## **20 ESSENTIAL DOCUMENTS FOR THE CONDUCT OF A CLINICAL TRIAL/RESEARCH: -**

### **20.1 Introduction:**

Essential Documents are those documents which individually and collectively permit evaluation of the conduct of a trial and the quality of the data produced. These documents serve to demonstrate the compliance of the investigator, sponsor and monitor with the standards of Good Clinical Practice and with all applicable regulatory requirements.

Essential Documents also serve a number of other important purposes. Filing essential documents at the investigator/institution and sponsor sites in a timely manner can greatly assist in the successful management of a trial by the investigator, sponsor and monitor. These documents are also the ones which are usually audited by the sponsor's independent audit function and inspected by the regulatory authority(ies) as part of the process to confirm the validity of the trial conduct and the integrity of data collected.

The minimum list of essential documents which has been developed follows. The various documents are grouped in three sections according to the stage of the trial during which they will normally be generated:

- 1) Before the clinical phase of the trial commences,
- 2) During the clinical conduct of the trial, and
- 3) After completion or termination of the trial.



A description is given of the purpose of each document, and whether it should be filed in either the investigator/institution or sponsor files, or both. It is acceptable to combine some of the documents, provided the individual elements are readily identifiable.

Trial master files should be established at the beginning of the trial, both at the investigator/institution's site and at the sponsor's office. A final close-out of a trial can only be done when the monitor has reviewed both investigator/institution and sponsor files and confirmed that all necessary documents are in the appropriate files.

Any or all of the documents addressed in this guideline may be subject to, and should be available for, audit by the sponsor's auditor and inspection by the regulatory authority (ies). The sponsor and investigator/institution should maintain a record of the location(s) of their respective essential documents including source documents. The storage system used during the trial and for archiving (irrespective of the type of media used) should provide for document identification, version history, search, and retrieval.

Essential documents for the trial should be supplemented or may be reduced where justified (in advance of trial initiation) based on the importance and relevance of the specific documents to the trial.

The sponsor should ensure that the investigator has control of and continuous access to the CRF data reported to the sponsor. The sponsor should not have exclusive control of those data.

When a copy is used to replace an original document (e.g., source documents, CRF), the copy should fulfill the requirements for certified copies.

The investigator/institution should have control of all essential documents and records generated by the investigator/institution before, during, and after the trial.

## 20.2 Before the Clinical Phase of the Trial Commences:

During this planning stage the following documents should be generated and should be on file before the trial formally starts.

Title of Document		Purpose	Located in the Files of	
			Investigator/Institution	Sponsor
1.	INVESTIGATOR'S BROCHURE	To document that relevant and current scientific information about the investigational product has been provided to the investigator	√	√
2.	SIGNED PROTOCOL AND AMENDMENTS, IF ANY, AND SAMPLE CASE REPORT FORM (CRF)	To document investigator and sponsor agreement to the protocol/amendment(s) and CRF	√	√
3.	INFORMATION GIVEN TO TRIAL SUBJECT		√	√
	INFORMED CONSENT FORM (including all applicable translations)	To document the informed consent	√	√
	ANY OTHER WRITTEN INFORMATION	To document that subjects will be given appropriate written information (content and wording) to support their ability to give fully informed consent	√	√
	ADVERTISEMENT FOR SUBJECT RECRUITMENT (if used)	To document that recruitment measures are appropriate and not coercive	√	—

4.	FINANCIAL ASPECTS OF THE TRIAL	To document the financial agreement between the investigator/institution and the sponsor for the trial	√	√
5.	INSURANCE STATEMENT (where required)		√	√
6.	SIGNED AGREEMENT BETWEEN INVOLVED PARTIES, e.g.:	To document agreements	—	—
	- investigator/institution and sponsor		√	√
	- investigator/institution and CRO		√	√ (where required)
	- sponsor and CRO		—	√
	- investigator/institution and authority(ies) (where required)		√	√
7.	<b>DATED, DOCUMENTED APPROVAL/FAVOURABLE OPINION OF INSTITUTIONAL REVIEW BOARD (IRB) /INDEPENDENT ETHICS COMMITTEE (IEC) OF THE FOLLOWING:</b> - protocol and any amendments - CRF (if applicable) - informed consent form(s) - any other written information to be provided to the subject(s) - advertisement for subject recruitment (if used) - subject compensation (if any) - any other documents given approval/ favorable opinion	To document that the trial has been subject to IRB/IEC review and given approval/favorable opinion. To identify the version number and date of the document(s)	√	√
8.	<b>INSTITUTIONAL REVIEW BOARD/INDEPENDENT ETHICS COMMITTEE COMPOSITION</b>	To document that the IRB/IEC is constituted in agreement with GCP	√	√ (where required)
9.	<b>REGULATORY AUTHORITY(IES) AUTHORISATION/APPROVAL/ NOTIFICATION OF PROTOCOL</b> (where required)	To document appropriate authorization/approval/notification by the regulatory authority(ies) has been obtained prior to initiation of the trial in compliance with the applicable regulatory requirement(s)	√ (where required)	√ (where required)
10.	<b>CURRICULUM VITAE AND/OR OTHER RELEVANT DOCUMENTS EVIDENCING QUALIFICATIONS OF INVESTIGATOR(S) AND SUB- INVESTIGATOR(S)</b>	To document qualifications and eligibility to conduct trial and/or provide medical supervision of Subjects	√	√

11.	<b>NORMAL VALUE(S)/RANGE(S) FOR MEDICAL/ LABORATORY/TECHNICAL PROCEDURE(S) AND/OR TEST(S) INCLUDED IN THE PROTOCOL</b>	To document normal values and/or ranges of the tests	√	√
12.	<b>MEDICAL/LABORATORY/TECHNICAL PROCEDURES /TESTS</b> - certification or - accreditation or - established quality control and/or external quality assessment or - other validation (where required)	To document competence of facility to perform required test(s), and support reliability of results	√ (where required)	√
13.	<b>SAMPLE OF LABEL(S) ATTACHED TO INVESTIGATIONAL PRODUCT CONTAINER(S)</b>	To document compliance with applicable labelling regulations and appropriateness of instructions provided to the subjects	—	√
14.	<b>INSTRUCTION FOR HANDLING OF INVESTIGATIONAL PRODUCT(S) AND TRIAL-RELATED MATERIALS</b> (if not included in protocol or Investigator's Brochure)	To document instructions needed to ensure proper storage, packaging, dispensing and disposition of investigational products and trial-related materials	√	√
15.	<b>SHIPPING RECORDS FOR INVESTIGATIONAL PRODUCT(S) AND TRIAL-RELATED MATERIALS</b>	To document shipment dates, batch numbers and method of shipment of investigational product(s) and trial-related materials. Allows tracking of product batch, review of shipping conditions, and accountability	√	√
16.	<b>CERTIFICATE(S) OF ANALYSIS OF INVESTIGATIONAL PRODUCT(S) SHIPPED</b>	To document identity, purity, and strength of investigational product(s) to be used in the trial	—	√
17.	<b>DECODING PROCEDURES FOR BLINDED TRIALS</b>	To document how, in case of an emergency, identity of blinded investigational product can be revealed without breaking the blind for the remaining subjects' treatment	√	√ (third party if applicable)
18.	<b>MASTER RANDOMISATION LIST</b>	To document method for randomization of trial population	—	√ (third party if applicable)
19.	<b>PRE-TRIAL MONITORING REPORT</b>	To document that the site is suitable for the trial (may be combined with 9.2.20)	—	√
20.	<b>TRIAL INITIATION MONITORING REPORT</b>	To document that trial procedures were reviewed with the investigator and the investigator's trial staff (may be combined with 9.2.19)	√	√

### 20.3 During the Conduct of the Clinical Trial:

In addition to having on file the above documents, the following should be added to the files during the trial as evidence that all new relevant information is documented as it becomes available.

Title of Document	Purpose	Located in the Files of	
		Investigator/ Institution	Sponsor
1. <b>INVESTIGATOR'S BROCHURE UPDATES</b>	To document that investigator is informed in a timely manner of relevant information as it becomes available	√	√
2. <b>ANY REVISION TO:</b> - protocol/amendment(s) and CRF - informed consent form - any other written information provided to Subjects - advertisement for subject Recruitment (if used)	To document revisions of these trial related documents that take effect during trial	√	√
3. <b>DATED, DOCUMENTED APPROVAL/FAVOURABLE OPINION OF INSTITUTIONAL REVIEW BOARD (IRB) / INDEPENDENT ETHICS COMMITTEE (IEC) OF THE FOLLOWING:</b> - protocol amendment(s) - revision(s) of: - informed consent form - any other written information to be provided to the subject - advertisement for subject recruitment (if used) - any other documents given approval/favorable opinion - continuing review of trial (where required)	To document that the amendment(s) and/or revision(s) have been subject to IRB/IEC review and were given approval/favorable opinion. To identify the version number and date of the document(s).	√	√
4. <b>REGULATORY AUTHORITY(IES) AUTHORISATIONS /APPROVALS / NOTIFICATIONS WHERE REQUIRED FOR:</b> protocol amendment(s) and other documents	To document compliance with applicable regulatory requirements	√ (where required)	√
5. <b>CURRICULUM VITAE FOR NEW INVESTIGATOR(S) AND/OR SUBINVESTIGATOR(S)</b>	(see 9.2.10)	√	√
6. <b>UPDATES TO NORMAL VALUE(S)/RANGE(S) FOR MEDICAL/ LABORATORY/ TECHNICAL PROCEDURE(S)/TEST(S) INCLUDED IN THE PROTOCOL</b>	To document normal values and ranges that are revised during the trial (see 9.2.11)	√ (where required)	√
7. <b>UPDATES OF MEDICAL/LABORATORY/ TECHNICAL PROCEDURES/TESTS</b> - certification or - accreditation or - established quality control and/or external quality assessment or - other validation (where required)	To document that test, remain adequate throughout the trial period (see 9.2.12)	√ (where required)	√
8. <b>DOCUMENTATION OF INVESTIGATIONAL PRODUCT(S) AND TRIAL-RELATED MATERIALS SHIPMENT</b>	(See 9.2.15.)	√	√

9.	<b>CERTIFICATE(S) OF ANALYSIS FOR NEW BATCHES OF INVESTIGATIONAL PRODUCTS</b>	(see 9.2.16)	—	√
10.	<b>MONITORING VISIT REPORTS</b>	To document site visits by, and findings of, the Monitor	—	√
11.	<b>RELEVANT COMMUNICATIONS OTHER THAN SITE VISITS</b> - letters - meeting notes - notes of telephone calls	To document any agreements or significant discussions regarding trial administration, protocol violations, trial conduct, adverse event (AE) reporting	√	√
12.	<b>SIGNED INFORMED CONSENT FORMS</b>	To document that consent is obtained in accordance with GCP and protocol and dated prior to participation of each subject in trial. Also, to document direct access permission (see 9.2.3)	√	—
13.	<b>SOURCE DOCUMENTS</b>	To document the existence of the subject and substantiate integrity of trial data collected. To include original documents related to the trial, to medical treatment, and history of subject	√	—
14.	<b>SIGNED, DATED AND COMPLETED CASE REPORT FORMS (CRF)</b>	To document that the investigator or authorized member of the investigator's staff confirms the observations recorded	√ (copy)	√ (original)
15.	<b>DOCUMENTATION OF CRF CORRECTIONS</b>	To document all changes/additions or corrections made to CRF after initial data were recorded	√ (copy)	√ (original)
16.	<b>NOTIFICATION BY ORIGINATING INVESTIGATOR TO SPONSOR OF SERIOUS ADVERSE EVENTS AND RELATED REPORTS</b>	Notification by originating investigator to sponsor of serious adverse events and related reports in accordance with Section 4.11 of the ICH-GCP Guidelines.	√	√
17.	<b>NOTIFICATION BY SPONSOR AND/OR INVESTIGATOR, WHERE APPLICABLE, TO REGULATORY AUTHORITY(IES) AND IRB(S)/IEC(S) OF UNEXPECTED SERIOUS ADVERSE DRUG REACTIONS AND OF OTHER SAFETY INFORMATION</b>	Notification by sponsor and/or investigator, where applicable, to regulatory authorities and IRB(s)/IEC(s) of unexpected serious adverse drug reactions in accordance with Section 5.17 and 4.11.1 of the ICH-GCP Guidelines and of other safety information in accordance with 5.16.2 and 4.11.2 of the ICH-GCP Guidelines.	√ (where required)	√
18.	<b>NOTIFICATION BY SPONSOR TO INVESTIGATORS OF SAFETY INFORMATION</b>	Notification by sponsor to investigators of safety information in accordance with 5.16.2 of the ICH-GCP Guidelines.	√	√
19.	<b>INTERIM OR ANNUAL REPORTS TO IRB/IEC AND AUTHORITY(IES)</b>	Interim or annual reports provided to IRB/IEC in accordance with 4.10 and to authority (ies) in accordance with 5.17.3 of the ICH-GCP Guidelines.	√	√ (where required)
20.	<b>SUBJECT SCREENING LOG</b>	To document identification of subjects who entered pre-trial screening	√	√ (where required)

21.	<b>SUBJECT IDENTIFICATION CODE LIST</b>	To document that investigator/institution keeps a confidential list of names of all subjects allocated to trial numbers on enrolling in the trial. Allows investigator/institution to reveal identity of any subject	√	—
22.	<b>SUBJECT ENROLMENT LOG</b>	To document chronological enrolment of subjects by trial number	√	—
23.	<b>INVESTIGATIONAL PRODUCTS ACCOUNTABILITY AT THE SITE</b>	To document that investigational product(s) have been used according to the protocol	√	√
24.	<b>SIGNATURE SHEET</b>	To document signatures and initials of all persons authorized to make entries and/or corrections on CRFs	√	√
25.	<b>RECORD OF RETAINED BODY FLUIDS/ TISSUE SAMPLES (IF ANY)</b>	To document location and identification of retained samples if assays need to be repeated	√	√

#### 20.4 After Completion or Termination of the Trial

After completion or termination of the trial, all of the documents identified in preceding two Sections should be in the file together with the following;

Title of Document		Purpose	Located in the Files of	
			Investigator/Institution	Sponsor
1.	<b>INVESTIGATIONAL PRODUCT(S) ACCOUNTABILITY AT SITE</b>	To document that the investigational product(s) have been used according to the protocol. To documents the final accounting of investigational product(s) received at the site, dispensed to subjects, returned by the subjects, and returned to sponsor	√	√
2.	<b>DOCUMENTATION OF INVESTIGATIONAL PRODUCT DESTRUCTION</b>	To document destruction of unused investigational products by sponsor or at site	√ (if destroyed at site)	√
3.	<b>COMPLETED SUBJECT IDENTIFICATION CODE LIST</b>	To permit identification of all subjects enrolled in the trial in case follow-up is required. List should be kept in a confidential manner and for agreed upon time	√	—
4.	<b>AUDIT CERTIFICATE</b> (if available)	To document that audit was performed	—	√
5.	<b>FINAL TRIAL CLOSE- OUT MONITORING REPORT</b>	To document that all activities required for trial close-out are completed, and copies of essential documents are held in the appropriate files	—	√
6.	<b>TREATMENT ALLOCATION AND DECODING DOCUMENTATION</b>	Returned to sponsor to document any decoding that may have occurred	—	√

7.	<b>FINAL REPORT BY INVESTIGATOR TO IRB/IEC WHERE REQUIRED, AND WHERE APPLICABLE, TO THE REGULATORY AUTHORITY(IES)</b>	To document completion of the trial	√	—
8.	<b>CLINICAL STUDY REPORT</b>	To document results and interpretation of trial	√ (if applicable)	√

## 21 REFERENCES

- 1) The DRAP Act, 2012.
- 2) The Drugs Act, 1976
- 3) The Bio-Study Rules, 2017.
- 4) Latest ICH-GCP E6 Guidelines
- 5) Latest ICH-E3 Guidelines

## 22 APPENDICES/ANNEXURES



**22.1 Annex-I-Form-I Along with Explanatory Notes****Form -I****[See rule 3]****Application for license to act as center, clinical trial site, CRO or laboratory**

I/we.....  
 ..... NIC number ..... of M/s  
 ..... business address and telephone number and fax  
 number.....  
 ..... hereby apply for grant of license  
 to the site for centers or clinical trial site or CRO or laboratory, situated  
 at.....  
 .....

2. Type of the site meant for (whichever is applicable): -

- (i) Bio-equivalence and Bio-availability studies
- (ii) CRO
- (iii) Laboratory
- (iv) Clinical trials-
  - (a) Phase I
  - (b) Phase II
  - (c) Phase III
  - (d) Phase IV

3. I enclose: -

- (a) Particulars regarding the legal status of the applicant i.e. in case of proprietorship the names of proprietors and their addresses, in the case of firm the name and names and addresses of its partners and in the case of company the name and address of the company and its directors).
- (b) Details of premises including layout plan of the site.
- (c) Details of the section wise equipment and machinery required for the analytical or bio- analytical and clinical studies.
- (d) Names and qualifications of the above sections along with their staff.
- (e) Details of the allied facilities associated with the trial center including ambulatory services, emergency handling etc.

**UNDERTAKING**

I/we hereby undertake / certify that the contents stated above are correct to the best of my/our knowledge and belief.

Name of the applicant Signature

Date:..... Seal of the firm/Company

### EXPLANATORY NOTES ON FORM-I

Application for approval and licensing of Clinical Trial Site, CROs, BA/BE Studies Center and Bio-Analytical Laboratory shall be made on application Form-I of the Bio-Study Rules, 2017, addressed to the Chairman or Secretary, CSC. The fee challan shall be generated from official website of DRAP, using this link (<https://fee.dra.gov.pk/login>).

**1. Type of the site meant for (whichever is applicable)**

Application Form-I of the Bio-Study Rules is for approval of Clinical Trial Site, CROs, BA/BE Studies Center and Bio-Analytical Laboratory. Applicants needs to specify by encircle/tick for any one of the following (Phase or Phases of Clinical Trial also need to be specified):

- (i) Bio-equivalence and Bio-availability studies
- (ii) CRO
- (iii) Laboratory
- (iv) Clinical trials-
  - (a) Phase I
  - (b) Phase II
  - (c) Phase III
  - (d) Phase IV

**2. Particulars, regarding the legal status of the applicant i.e. in case of proprietorship the names of proprietors and their addresses, in the case of firm the name and names and addresses of its partners and in the case of company the name and address of the company and its directors):**

Applicant needs to provide any legal document (e.g. SECP Certificate, Registration of Firm Certificate, Health Care Commission Registration Certificate, any other law or act etc., which may clarify legal status of the organization).

**3. Details of premises including layout plan of the site:**

Applicant need to provide complete layout plan of the applied site/premises with detail of each section.

**4. Details of the section wise equipment and machinery required for the analytical or bio- analytical and clinical studies:**

Applicant need to provide complete list of section wise equipment/machinery available for testing for analytical or bio-analytical and clinical studies.

**5. Names and qualifications of the above sections along with their staff:**

Applicant need to provide organogram and complete list of officers or staff working at the site/premises applied for approval.

**6. Details of the allied facilities associated with the trial center including ambulatory services, emergency handling etc.:**

Applicant need to provide details of the allied facilities associated with the trial center including ambulatory services, emergency handling etc., this requirement is not applicable on CROs and Bio- analytical Laboratories.

**7. Undertaking on stamp paper:**

Applicant need to provide undertaking on stamp paper (amount of stamp paper is not specified).

**22.2 Annex-II-Form-II along with explanatory notes****Form – II**

[See rule 7]

**Application for approval and registration of clinical trial**

- I/we.....
- ..... NIC number .....of M/sbusiness address and telephone number and fax number hereby apply for approval or registration of clinical trial, titled as per detail below:
- (1) Name of Investigational product, including all available names; trade, generic or INN name etc.....
  - (2) Purpose of trial defining the indication along with the anticipated cost of the project and sources of fund.....
  - (3) Phase of the clinical trial to be conducted and its proposed duration.....
  - (4) Proposed center for trial.....
  - (5) List of participating countries.....
  - (6) Investigator brochure along with summary.....
  - (7) Pre-clinical, clinical data, safety studies.....
  - (8) Final protocol.....
  - (9) Detail of the investigator (Principal investigator and others along with CVs.....
  - (10) IRB approval.....
  - (11) Ethical committee composition (names and designations) .....
  - (12) Site approval by the Ethics committee.....
  - (13) Informed consent (English and Urdu) .....
  - (14) Summary protocol or synopsis (Investigational Product) .....
  - (15) Adverse Event Reporting Form or CIOMS Form.....
  - (16) Name of the monitors or clinical research associate.....
  - (17) Evidence of registration in country of origin (GMP certificate along with CoPP or Free sale certificate) .....
  - (18) Copy of registration letter if registered in Pakistan.....
  - (19) Proposed label of investigational product.....
  - (20) Quantity of investigational products to be used in the trial along with justification...

*(Note: All the quantities of the investigational product should be procured from one single source)*

**UNDERTAKING**

I/we hereby undertake / certify that the contents stated above are correct to the best of my/our knowledge and belief.

Name of the applicant Signature

Date: ..... Seal of the firm/Company

**CHECKLIST FOR FORM-II / CLINICAL TRIAL/STUDY APPLICATION**

<b>S. No.</b>	<b>Required Documents</b>
1.	Application on prescribed form along with Fee
2.	Investigator Brochure
3.	Final Protocol
4.	Informed consent form (English and Urdu)
5.	List of participating countries (If applicable)
6.	Phase of trial
7.	Quantities of Investigational Product to be imported or procured
8.	Site of the trial
9.	C.V of investigator
10.	Ethical committee approval with complete composition of committee i.e. Name and designations of the members
11.	Approval from National Bio-ethics Committee (PHRC)
12.	GMP certificate along with Free Sale Certificate or Certificate of Pharmaceutical Product (For locally manufactured product GMP Cert., COA of the Product and Registration Letter will be required)
13.	Pre-clinical, clinical data and safety studies.
14.	Summary of the protocol
15.	Summary of the Investigator Brochure
16.	Adverse Event Reporting form
17.	No. of Patients to be enrolled in each center
18.	Name of monitors or clinical research associate
19.	Evidence of registration in country of origin
20.	Copy of registration letter (if registered in Pakistan)
21.	Sample of label of Investigational Product
22.	Duration of trial
23.	Undertaking on stamp paper.

## EXPLANATORY NOTES FOR FORM-II

### 1. Application along with Fee

Application for approval or registration of Clinical Trial shall be made on application Form-II of the Bio-Study Rules, 2017, addressed to the Chairman or Secretary, CSC. The fee challan shall be generated from official website of DRAP, using this link:

<https://fee.dra.gov.pk/login>.

### 2. Investigator Brochure (As per ICH GCP Guidelines)

The Investigator's Brochure (IB) is a compilation of the clinical and nonclinical data on the investigational product(s) that are relevant to the study of the product(s) in human subjects. The IB must be prepared in accordance with the format given under ICH GCP Guidelines.

### 3. Final Protocol (As per ICH GCP Guidelines)

The protocol is a document that describes how a clinical trial shall be conducted. The core components of a protocol include, objective(s), design, methodology, statistical considerations and organization of the clinical trial. The clinical trial protocol must be prepared in accordance with the format given under ICH GCP Guidelines.

### 4. Informed consent form (English and Urdu)

Informed consent means a process by which a subject voluntarily confirms his willingness to participate in a particular trial, after having been informed of all aspects of the trial that are relevant to the subject's decision to participate. It is documented by means of a written, signed and dated information. The informed consent form is required to be prepared in both English, Urdu and/or local language (if any). A very basic language should be used which can be understood easily.

### 5. List of participating countries (If applicable)

In case of a multi-country trial, the complete list of participating countries should be provided.

### 6. Phase of trial

Mention the phase of clinical trial in accordance with the protocol.

### 7. Quantity of Drug(s) to be imported/procured/manufactured for the trial

Mention justifiable quantities of the trial material which shall be required for the study.

### 8. Site(s) of the trial

Mention the names and addresses of the clinical trial sites where the trial shall be conducted. All the participating sites must be licensed under the Bio-study Rules, 2017.

### 9. C.Vs of investigator(s)

Provide the detailed CVs of all participating investigators.

### 10. Ethical committee approval with complete composition of committee i.e. Name and designations of the members

The approval of Institutional Review Board (IRB) is required to be provided with complete details of the composition of the approving Board/Committee, mentioning name and designations of the members.

### 11. Approval from National Bio-ethics Committee

The approval of the National Bio-ethics Committee, Govt. of Pakistan, is mandatory requirement

for conducting a clinical trial. The applicant is required to seek a prior approval from NBC and submit the copy of the same along with the application for registration of a clinical trial before the CSC decision.

#### **12. GMP certificate along with Free Sale Certificate/Certificate of Pharmaceutical Product**

The Investigational Product (IP) must be procured from a GMP compliant source. In case the IPs is approved in the country of origin, an evidence in this regard must be provided, in the form of a copy

of Free Sale Certificate or Certificate of Pharmaceutical Product (CoPP) or online approval evidence from relevant NRA or any Reference Regulatory Authority. For locally manufactured product GMP Certificate, Certificate of Analysis and Registration Letter shall be required.

#### **13. Pre-clinical, clinical data and safety studies.**

Detailed reports of the previously conducted In-vivo, In-vitro pre-clinical studies, relevant clinical data and safety studies on the Investigational Product should be provided.

#### **14. Summary of the protocol**

A short summary of the clinical trial protocol should be provided for quick review.

#### **15. Summary of the Investigator Brochure**

A short summary of the Investigator Brochure should be provided for quick review.

#### **16. Adverse Event Reporting form**

The applicant should provide a specimen of the Adverse Event Report Form for collection of the data related to the adverse events related to the study.

#### **17. No. of Patients to be enrolled in each center**

Number of participants should be provided which are planned to be enrolled for the study. For multicenter trial, separate detail should be provided for each center.

#### **18. Name of monitors/clinical research associate**

Provide names of the clinical trial monitors or research associates which shall be engaged in the study at each participating site.

#### **19. Evidence of registration of study drug in country of origin**

If the IPs is approved in the country of origin, evidence in this regard must be provided.

#### **20. Copy of registration letter (if drug is registered in Pakistan)**

For locally manufactured product, a valid Registration Letter, issued by DRAP, shall be required.

#### **21. Sample of label of drug**

Provide sample specimen of the label of Investigational Product.

#### **22. Duration of trial**

Provide tentative duration of the study in accordance with the submitted protocol.



**22.3 Annex-III-Form-IIA along with explanatory notes****Form – IIA**

[See rule 7]

**Application for approval and registration of bioequivalence or bioavailability study**

I/we.....  
 CNIC number ..... of M/s.....  
 business address and telephone number and fax number.....  
 hereby apply for approval and registration of BA or BE study, titled.....

as per detail below:

- (1) Name of Investigational Product (including all available names; trade, generic or INN name, chemical code etc.,).....
- (2) Dosage Form of Investigational Product .....
- (3) Formulation of Investigational Product .....
- (4) Pharmacodynamics and Pharmacokinetics of Investigational Product .....
- (5) Purpose of study defining the indication along with the anticipated cost of the project and sources of fund.....
- (6) Proposed center for study.....
- (7) Investigational design and study plan.....
- (8) Pre-clinical or clinical data or safety studies.....
- (9) Final protocol.....
- (10) Detail of the investigator (Principal investigator, analysts and others along with CV) .....
- (11) IRB approval.....
- (12) Ethical committee composition (names and designations) .....
- (13) BA/BE Study Site approval by DRAP .....
- (14) Informed consent (English and Urdu) .....
- (15) Summary of the protocol or synopsis (Investigational Product) .....
- (16) Adverse Event Reporting Form.....
- (17) Name of the monitor or clinical research associate.....
- (18) Certificate of Analysis of Test Product and GMP Certificate or Drug Manufacturing License of the Manufacturer .....
- (19) Details regarding reference product (Country of origin, mode of purchase, shipment procedure) along with any other relevant documents if available.....
- (20) Proposed label of investigational product.....
- (21) Quantity of investigational product to be used in the study along with justification.....

*(Note: All the quantities of the each of investigational product should be procured from one single source)*

**UNDERTAKING**

I/we hereby undertake / certify that the contents stated above are correct to the best of my/our knowledge and belief.

Name of the applicant Signature

Date: .....

Seal of the firm/Company

*Note: In case of approval of the applied BA/BE Studies, the applicant will apply for Import license on Form-III of the Drugs (Import and Export) Rules, 1976."*

## EXPLANATORY NOTES FOR FORM- IIA (Amended)

### 1. Application along with Fee

Application for approval or registration of Clinical Trial shall be made on application Form–II A (amended) of the Bio-Study Rules, 2017, addressed to the Chairman or Secretary, CSC. The fee challan shall be generated from official website of DRAP, using this link:

[\(<https://fee.dra.gov.pk/login>\)](https://fee.dra.gov.pk/login).

### 2. Details regarding IPs

- Name of Investigational Product (including all available names; trade, generic or INN name, chemical code etc.)
- Dosage Form of Investigational Product.
- Formulation of Investigational Product
- Pharmacodynamics and Pharmacokinetics of Investigational Product.

### 3. Details regarding purpose of BA/BE Study and Funding

- Purpose of BA/BE Study defining the indication.
- Anticipated cost of the project
- Sources of funding for the project/BA/BE Study.

### 4. Proposed center for study/ BA/BE Study Site approval by DRAP

Mention name with address and DRAP licence granted to the Center for BA/BE Studies.

### 5. Investigational design and study plan

Describe BA/BE Study plan along with its design.

### 6. Investigator Brochure (As per ICH GCP Guidelines)

The Investigator's Brochure (IB) is a compilation of the clinical and nonclinical data on the investigational product(s) that are relevant to the study of the product(s) in human subjects. The IB must be prepared in accordance with the format given under ICH GCP Guidelines.

### 7. Pre-clinical or clinical data or safety studies

Attach all IPs related published Pre-Clinical, Clinical and Safety data.

### 8. Final Protocol (As per ICH GCP Guidelines)

The protocol is a document that describes how a clinical trial shall be conducted. The core components of a protocol include, objective(s), design, methodology, statistical considerations and organization of the clinical trial. The clinical trial protocol must be prepared in accordance with the format given under ICH GCP Guidelines.

### 9. Detail of the Investigator(s)

Attach details regarding Principal investigator, analysts and others study team along with CVs.

### 10. Ethical approvals from IRB/ERC and NBC

IRB/ERC approval along with complete composition of the Committee (names and designations)

### 11. Approval from National Bio-ethics Committee

The approval of the National Bio-ethics Committee, is mandatory requirement for conducting a Clinical Research/Study. The applicant is required to seek a prior approval from NBC and submit the copy of the same along with the application for registration of BA/BE Study.

### 12. Informed consent form (English and Urdu)

Informed consent means a process by which a subject voluntarily confirms his willingness to participate in a particular trial, after having been informed of all aspects of the trial that are relevant to the subject's decision to participate. It is documented by means of a written, signed and dated information. The informed consent form is required to be prepared in both English and Urdu. A very

basic language should be used which can be understood easily.

**13. Summary of the protocol**

A short summary of the study protocol should be provided for quick review.

**14. Adverse Event Reporting form**

The applicant should provide a specimen of the Adverse Event Report Form for collection of the data related to the adverse events related to the study.

**15. Name of the monitor or clinical research associate:**

Attach details regarding Study Monitors and other Clinical Research Associates (If any).

**16. C.Vs of investigator(s)**

Provide the detailed CVs of all participating investigators.

**17. Certificate of Analysis of Test Product and GMP Certificate or Drug Manufacturing License of the Manufacturer**

The Investigational Products (IPs) must be procured from a GMP compliant source. Certificate of analysis and GMP Certificate of the Test Product along with Drug Manufacturing licence of the manufacturer need to be provided. Whereas, for Reference Product details regarding Country of origin, mode of purchase, shipment procedure along with any other relevant documents if available, need to be provided.

**18. Name of monitors/clinical research associate**

Provide names of the clinical trial monitors or research associates which shall be engaged in the study at each participating site.

**19. Sample of label of Study Drugs**

Provide sample specimen of the label of Investigational Products (Test and Reference products).

**20. Duration of the Study**

Provide tentative duration of the study in accordance with the submitted protocol.

**21. No. of Patients to be enrolled in the Study**

Number of participants should be provided which are planned to be enrolled for the study.

**22. Quantity of Drug(s) to be imported/procured for the Study**

Mention justifiable quantities of the study material which shall be imported/procured for the study.

**22.4 Annex-IV- Form-III Along with Explanatory Notes**

**Form -III**  
[See rule 6]

**Application for renewal of license to act as center, clinical trial site, CRO or laboratory**

I/we.....

CNIC number ..... of M/s.....

business address and telephone number and fax number.....

hereby apply for renewal of license for center or clinical trial site or CRO or laboratory.

**2. Type of the studies meant for: -**

- (i) Bio-equivalence and Bio-availability studies
- (ii) CRO
- (iii) Laboratory
- (iv) Clinical trials-
  - (a) Phase I
  - (b) Phase II
  - (c) Phase III
  - (d) Phase IV

**3. I enclose: -**

- (a) Particulars regarding the legal status of the applicant i.e. in case of proprietorship the names of proprietors and their address, in the case of firm the name and names and addresses of its partners and in the case of company the name and address of the company and its directors.
- (b) Details of premises including lay out plan of the site.
- (c) Details of the section wise equipment and machinery for required for the analytical or bio- analytical and clinical studies.
- (d) Name and qualifications of the management, and
- (e) Details of the allied facilities associated with the trial center including ambulatory services, emergency handling etc.

**UNDERTAKING**

I/we hereby undertake / certify that the contents stated above are correct to the best of my/our knowledge and belief.

Name of the applicant Signature

Date: ..... Seal of the firm/Company

### EXPLANATORY NOTES FOR FORM- III

#### 1. Application along with Fee

Application for renewal of Clinical Trial Site, CROs, BA/BE Studies Center and Bio-Analytical Laboratory license shall be made on application Form–III of the Bio-Study Rules, 2017, addressed to the Chairman or Secretary, CSC. The fee challan shall be generated from official website of DRAP, using this link (<https://fee.dra.gov.pk/login>). A separate guideline in this regard is also available on DRAP website:

#### 2. Type of the site meant for (whichever is applicable)

Application Form-III of the Bio-Study Rules is for renewal of Clinical Trial Site, CROs, BA/BE Studies Center and Bio-Analytical Laboratory licenses. Applicants needs to specify by encircle/tick for the same for which previous license was issued. (Phase or Phases of Clinical Trial also need to be specified):

- (i) Bio-equivalence and Bio-availability studies
- (ii) CRO
- (iii) Laboratory
- (iv) Clinical trials-
  - (a) Phase I
  - (b) Phase II
  - (c) Phase III

#### 3. Particulars regarding the legal status of the applicant i.e. in case of proprietorship the names of proprietors and their addresses, in the case of firm the name and names and addresses of its partners and in the case of company the name and address of the company and its directors):

Applicant needs to provide any legal document (e.g. SECP Certificate, Registration of Firm Certificate, Health Care Commission Registration Certificate, any other law or act etc., which may clarify legal status of the organization)

#### 4. Details of premises including layout plan of the site:

Applicant need to provide complete layout plan of the applied site/premises with detail of each section.

#### 5. Details of the section wise equipment and machinery required for the analytical or bio-analytical and clinical studies:

Applicant need to provide complete list of section wise equipment/machinery available for testing for analytical or bio-analytical and clinical studies.

#### 6. Names and qualifications of the above sections along with their staff:

Applicant need to provide organogram and complete list of officers or staff working at the site/premises applied for approval.

#### 7. Details of the allied facilities associated with the trial center including ambulatory services, emergency handling etc.:

Applicant need to provide details of the allied facilities associated with the trial center including ambulatory services, emergency handling etc., this requirement is not applicable on CROs and Bio-analytical Laboratories.

#### 8. Undertaking on stamp paper:

Applicant need to provide undertaking on stamp paper (amount of stamp paper is not specified).

## 22.5 Annex-V-Investigator's Brochure Template

### INVESTIGATOR'S BROCHURE

#### TITLE PAGE (*Example*)

#### SPONSOR'S NAME

#### Product:

#### Research Number:

Name(s): Chemical, Generic (if approved)

Trade Name(s) (if legally permissible and desired by the sponsor)

#### Edition Number:

#### Release Date:

Replaces Previous Edition Number:

Date

:



## 22.6 SAMPLE TABLE OF CONTENTS OF INVESTIGATOR'S BROCHURE

-	Confidentiality Statement (optional).....
-	Signature Page (optional).....
1	Table of Contents.....
2	Summary.....
3	Introduction.....
4	Physical, Chemical, and Pharmaceutical Properties and Formulation.....
5	Nonclinical Studies.....
5.1	Nonclinical Pharmacology.....
5.2	Pharmacokinetics and Product Metabolism in Animals.....
5.3	Toxicology.....
6	Effects in Humans.....
6.1	Pharmacokinetics and Product Metabolism in Humans.....
6.2	Safety and Efficacy.....
6.3	Marketing Experience.....
7	Summary of Data and Guidance for the Investigator.....

*NB: References on 1. Publications 2. Reports*

*These references should be found at the end of each chapter*

*Appendices (if any)*

## 22.7 Annex-VI Study Protocol Template

### SAMPLE TABLE OF CONTENTS OF STUDY PROTOCOL

- The submitted protocol should have following contents with details as per the latest ICH-GCP Guidelines:

1.	General Information.....
2.	Background Information.....
3.	Trial Objectives and Purpose .....
4.	Trial Design .....
5.	Selection and Withdrawal of Subjects.....
6.	Treatment of Subjects.....
7.	Assessment of Efficacy.....
8.	Assessment of Safety.....
9.	Statistics .....
10.	Direct Access to Source Data/Documents .....
11.	Quality Control and Quality Assurance .....
12.	Ethics .....
13.	Data Handling and Recordkeeping .....
14.	Financing and Insurance .....
15.	Publication Policy .....
16.	Supplements .....

## 22.8 Annex-VII Informed Consent Form Template

### INFORMED CONSENT TEMPLATE

#### 1. Checklist for study Subject's informed consent documents

##### 1.1 Essential Elements:

1. Statement that the study involves research and explanation of the purpose of the research
2. Expected duration of the Subject's participation
3. Description of the procedures to be followed, including all invasive procedures and
4. Description of any reasonably foreseeable risks or discomforts to the Subject
5. Description of any benefits to the Subject or others reasonably expected from research. If no benefit is expected Subject should be made aware of this.
6. Disclosure of specific appropriate alternative procedures or therapies available to the Subject.
7. Statement describing the extent to which confidentiality of records identifying the Subject will be maintained and who will have access to Subject's medical records
8. Trial treatment schedule(s) and the probability for random assignment to each treatment (for randomized trials)
9. Compensation and/or treatment(s) available to the Subject in the event of a trial-related injury
10. An explanation about whom to contact for trial related queries, rights of Subjects and in the event of any injury
11. The anticipated prorated payment, if any, to the Subject for participating in the trial
12. Subject's responsibilities on participation in the trial
13. Statement that participation is voluntary, that the subject can withdraw from the study at any time and that refusal to participate will not involve any penalty or loss of benefits to which the Subject is otherwise entitled
14. Any other pertinent information

##### 1.2 Additional elements, which may be required

- (a) Statement of foreseeable circumstances under which the Subject's participation may be terminated by the Investigator without the Subject's consent.
- (b) Additional costs to the Subject that may result from participation in the study.
- (c) The consequences of a Subject's decision to withdraw from the research and procedures for orderly termination of participation by Subject.
- (d) Statement that the Subject or Subject's representative will be notified in a timely manner if significant new findings develop during the course of the research which may affect the Subject's willingness to continue participation will be provided.
- (e) A statement that the particular treatment or procedure may involve risks to the Subject (or to the embryo or fetus), if the Subject is or may become pregnant), which are currently unforeseeable
- (f) Approximate number of Subjects enrolled in the study.

#### 2. Format of informed consent form for Subjects participating in a clinical trial

*Informed Consent form to participate in a clinical trial*

Study Title:

Study Number:

Subject's Initials: \_\_\_\_\_ Subject's Name: \_\_\_\_\_

Date of Birth / Age: \_\_\_\_\_

Please initial box (Subject)

## 22.9 Annex-VIII-Summary Evaluation Report

### Summary Evaluation Report

< File Reference Number>

<Pharmacy Services Division>

**Subject:** <Type of application along with complete title of the Trial/Study>.

Application for subject cited above is from Dr. <Applicant Name>, <Designation and Institute/Organization Name with its address>, dated XX-ABC-XXXX. Wherein request has been made for approval of subject Clinical Trial. Application is on prescribed Form-II, along with prescribed processing fee of Rs. XXX, XXX/- deposited vide challan no. XXXXXXXXXX, dated XX-ABC-XXXX. <Trial/Study enlistment status on other international trial registries and/or approval status in other participating countries>.

2. <Details regarding nature of trial like Multi-Regional Clinical Trial (MRCT)/Multi-Countries Clinical Trial (MCCT)>. <Brief on applied CTS(s) of the country participating in the applied trial/study>

3. The details regarding trial, sponsor and responsible party is as under:
- Sponsor:** <Name with address of the trial/study Sponsor(s)>.
  - Collaborators:** <Name with address(s) of the trial/study collaborators>.
  - Purpose of trial:** <Brief on purpose of trial as mentioned in the attached protocol>
  - Quantity of IPs required along with justification:** <Extract data from application put in the following table along with justification submitted by the applicant/Sponsor>:

IPs	Molecule	Strength	Pack Size	Manufacturer	No. of Patients	Patient Does	Frequency	Total
Packaging site with address: <If any/other than Sponsor/Manufacturer>								

- Source(s) of IPs and Comparator/Ancillary products:**
  - <Name and complete address of IPs manufacturer(s)>
  - <Name and complete address of Placebo/Comparator(s) manufacturer(s) (if any)>.
  - <Name and complete address of Ancillary products manufacturer(s) (if any)>.
- Wastage and Damage % (along with its justification):**
  - Active:  $XXX * XX\% = XXX$ ; Total Import Quantity:  $XXX + XXX = XXX$
  - Placebo/Comparator:  $XXX * XX\% = XXX$ ; Total Import Quantity:  $XXX + XXX = XXX$
  - Other/Ancillary items to be imported for the trial:
    - <Details and quantity not mentioned>
    - <Details and quantity not mentioned>
- Number of subjects to be recruited:** XXXX Subjects (Globally) and XX Subjects in Pakistan.
- Anticipated cost of the project:** <USD or any other currency mentioned in application) XXX, XXX/->

**ix. Study design and details:** <Extract data from application and put in the following table>

<b>Study type</b>	
<b>Estimated Enrollment:</b>	
<b>Allocation:</b>	
<b>Intervention Model:</b>	
<b>Masking:</b>	
<b>Primary Purpose:</b>	
<b>Official Title:</b>	
<b>Estimated Study Start Date:</b>	
<b>Estimated Primary Completion Date:</b>	
<b>Estimated Study Completion Date:</b>	

**4.** <Details regarding applied Clinical Trial Sites comprising of primary and secondary objective(s) of the trial/study>

<b>S.No.</b>	<b>Name and Licence No. of Site(s)</b>	<b>Approval/Renewal Status as per DRAP's Record</b>	<b>Remarks</b>
i.			
ii.			
iii.			
iv.			
v.			

- Primary Outcome Measures/objective(s):
  - i. ABC
  - ii. XYZ
- Secondary Outcome Measures(s):
  - i. abc
  - ii. xyz
- Any other outcomes of special interest (if any):
  - i. abc
  - ii. xyz

**5.** <The details of the submitted documents are as under>

<b>S. No.</b>	<b>Document</b>	<b>Remarks</b>
1	Application on prescribed Form-II	<Remarks about attachment and shortcoming (if any)>
2	Prescribed Fee	<Remarks about attachment along with challan/fee voucher number with submission date and shortcoming(s) (if any)>
3	Investigator Brochure (s)	<Remarks about attachment along with IB Edition/Version No. and Date and shortcoming(s) (if any)>
4	Final protocol	<Remarks about attachment along with Protocol Edition/Version No. and Date and shortcoming(s) (if any)> <Remarks and details regarding subject's insurance>
5	Informed consent and participant information sheet (Urdu to English)	<Remarks about attachment along with ICF Edition/Version No. and Date and shortcoming(s) (if any)>
6	List of participating countries	<Mention names of participating countries as described in application and countercheck it from other international trial registry (if any) and mention any contradiction if found>
7	Phase of trial.	<Mention Phase of the trial/study>

8	Quantity of drug / trial material to be imported on Form 4 under the Drugs (Import and Export) Rules, 1976 and application for import of trial material.	<Mention following details> Wastage and Damage % will be XX%: Active: XXX * XX% = XXX; Total Import Quantity: XXX + XXX = XXX Dosage Form Placebo/Comparator: XXX * XX% = XXX; Total Import Quantity: XXX + XXX = XXX Dosage Form
9	Site of the trial	<Provide name and licence number of all applied CTS and shortcoming(s) (if any)> i. a ii. a iii. a
10	Institutional Review Board (IRB) approval of sites with complete composition of committee i.e. names and designation of members.	<Provide details regarding attached IRB/ERC approvals as per applied Clinical Trial Site(s) and shortcomings (if any)> i. a ii. a iii. a
11	Approval of National Bio-ethics Committee (NBC)	<Provide NBC approval reference letter No. dated XXth-ABC-XXXX and period of attached NBC approval.>
12	CV's of the Investigators	<Details regarding attached CVs of PI and Co-PI's i. Dr. A (PI) ii. Dr. B (Co-PI) iii. Dr. C (Analyst/Bio-Statistician)>
13	GMP certificate along with COPP and free sale certificate of the investigational product.	<Remarks regarding attachment of GMP Certificate(s) and CoPP along with following details:> • <Name(s) and Complete Address(s) of Manufacturer(s) of IPs> • <Name(s) and Complete Address(s) of Manufacturer(s) of Placebo/Comparator> <Mention also brief regarding shortcomings (if any)>
14	Pre-clinical/clinical safety studies	<Remarks regarding attachment of Pre-clinical/clinical safety studies (as required by applied Phase of the trial)> <Mention also brief regarding shortcomings (if any)>
15	Summary of Protocol	<Remarks regarding attachment of Protocol Summary and brief regarding shortcomings (if any)>
16	Summary of Investigator Brochure	<Remarks regarding attachment of IB Summary and brief regarding shortcomings (if any)>
17	Adverse Event Reporting Form	<Remarks regarding attachment of ADR/AE/SAE Reporting Form and brief regarding shortcomings (if any)>.
18	No of patients to be enrolled in each center.	<Remarks regarding attachment and provided details regarding bifurcation of subject's enrolment at each CTS and brief regarding shortcomings (if any)> i. XXX Subjects will be enrolled at ABC Site. ii. XXX Subjects will be enrolled at BCD Site. iii. XXX Subjects will be enrolled at CDE Site. Total 84 subjects to be enrolled in Pakistan. Total 1490 Subjects to be enrolled globally.
19	Name of Monitors and Clinical Research Associate	<Brief regarding Sponsor's nominated monitoring firm/CRO and name(s) of nominated monitors:> • XXX • ABC • XYZ
20	Evidence of registration in country of origin.	<Remarks regarding attachment and brief regarding shortcomings (if any)>



21	Copy of registration letter (if registered in Pakistan)	<Remarks regarding attachment and brief regarding shortcomings (if any)>
22	Sample of label of the investigational product / drug.	<Remarks regarding attachment and brief regarding shortcomings (if any)>
22	Duration of trial	<Mention duration of trial as provided in application/protocol>
23	Undertaking on Stamp paper	<Remarks regarding attachment and brief regarding shortcomings (if any)>

6. <Remarks and details regarding any other documents provided along with application which are not mentioned in Form-II Checklist>

For example:

- i. <Investigator Instructions Manual>
- ii. <Laboratory Manual>
- iii. <Material Transfer Agreement>
- iv. <Details of ancillary products/lab kits>
- v. <Any other documents etc.>

7. Study Risk-Calculation, its Score and priority for Risk-Based GCP Inspection.
8. <Evaluator/Assessor remarks about application completeness and brief regarding shortcomings, which has been shared with applicant and applicant reply (if any)>

**(NAME OF ASSESOR/EVALUATOR)**  
Designation (Pharmacy Services Division-DRAP)

**22.10 Annex-IX-CRO Inspection Checklist****CONTRACT RESEARCH ORGANIZATION) INSPECTION CHECKLIST**

Name of facility: \_\_\_\_\_

Address: \_\_\_\_\_

Organization Type: - Public ☐ Not for Profit ☐ Private ☐ Other- \_\_\_\_\_

Name of Owner / Proprietor: \_\_\_\_\_

Date of inspection: \_\_\_\_\_

(dd/mm/yyyy) \_

<b>i. Organization and personnel</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Organizational chart exists and accurately represents the organization? The following departments are needed: • Clinical Operations • Regulatory • IT Support Departments • HR • Finance • QC				
Are Job Descriptions Available for all personnel?				
Are training records Available?				
Are there personnel curricula (training, matrix/plan) established and documented for each individual?				
Does the training program include new hire training and re-qualification training for personnel?				
Has personnel been appropriately trained to perform functions required by job descriptions?				
Is there a procedure to assess and document personnel competency on an annual basis?				
Have personnel received regulatory training? GCP <input type="checkbox"/> Others: _____				
Is there a system in place for personnel to report any safety concerns or incidents?				
Are external contractors/vendors utilized? Are they qualified/ approved for use?				

Is there a Quality Assurance Unit?				
If yes, what are the roles of the Quality Control and the Quality Assurance group?				
Does the Quality Assurance Unit perform audits, trend metrics and report the results to the Senior Management?				
Is the Quality Assurance Unit independent from the personnel engaged in the direction or conduct of a clinical trial?				
<b>ii. Standard Operating Procedures / Methods</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a governing SOP that outlines the creation, revision, approval, distribution, document control and retirement of SOPs?				
Is there a current index listing of the SOPs available?				
Is there a schedule for review of the SOPs?				
Are the SOPs in locations where they are used?				
Is there a system for documenting and handling SOP/method deviations and CAPAs?				
Is there a change control system for SOP/Methods?				
Does the Organization have SOPs to cover all the aspects of Clinical Operations e.g., Study start up, Study Conduct and Study Closeout/Completion?				
<b>iii. Facility</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is security and confidentiality adequate so as to prevent unauthorized access to records?				
Is there sufficient space to store materials, archive records and for equipment to function properly?				
Is the facility reasonably maintained and clean?				
Is safety equipment (e.g. fire extinguishers etc.) available?				
If yes, is the equipment maintained?				
Does the Organization have a disaster recovery plan that covers all areas of the facility including computer systems and equipment?				
Are generators utilized at the facility?				
<b>iv. Data handling Procedures and Computer Validation</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is access to computers limited by an individual username and password system (Organization members cannot share a username)?				
How is the computed network and computer systems maintained, if applicable?				
Are there a computer validation master plan and/or SOPs?				
List computers systems and software utilized. Validated?				
Are changes to computer systems controlled and documented?				
Are records of computer system errors maintained and investigated?				

Are records of hardware maintenance and repairs maintained?				
Are computers backed up routinely to prevent loss of data? Is there a backup log?				
Is there a preventative maintenance program for computer systems?				
<b>vii. Records and Reports</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Does a documentation control system exist and is functional?				
Is there a SOP or a system for the retention, storage, and destruction of records?				
How does the site ensure the sponsor's proprietary information is not disclosed to unauthorized personnel or external organizations?				
<b>viii. Record Retention and Archival</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a dedicated facility/area for the archival of records?				
Is there controlled access to the archival facility?				
Is the environment of the facility monitored and controlled?				
Is the procedure for archiving records outlined in an SOP?				
Is the retention time for records stated in the SOP?				
Is there a method of electronic data archival?				
<b>ix. Clinical Study Site</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
(IRB/IEC approval is necessary for conducting the clinical trial at a site. If local IRB/IEC is not available NBEC approval shall cover the site)				
Does the facility have an IRB/IEC available?				

**Remarks of inspection team:**


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**Concluding status of inspection / application :( Circle One)****Recommended for approval**☐**Deferred for improvements**☐**Recommended for rejection**☐**Name****Signature**

Inspector:

Inspector:

Inspector:

Inspector:

**22.11 Annex-X- CTS Inspection Checklist****CLINICAL TRIAL SITE (CTS) INSPECTION CHECKLIST**

Name of facility: \_\_\_\_\_

Address: \_\_\_\_\_

Organization Type: - Public ☐ Not for Profit ☐ Private ☐ Other- \_\_\_\_\_

Name of Owner / Proprietor: \_\_\_\_\_

Date of inspection: \_\_\_\_\_

(dd/mm/yyyy) \_

<b>i. General Information</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations / Recommendations</b>
Is this CTS a primary care, secondary care or tertiary care facility? (Record one in observations section)				
Is this the Composite CTS (Where Principal investigator is located)?				
Is the facility registered with the Healthcare Commission?				
If yes, is the certificate, available for review and is valid?				
Is there enough space available for proper functioning for clinical trials?				
Is there an outpatient facility?				
If yes, On an average how many patients visit per day?				
Is there an inpatient facility?				
If yes, how many beds?				
Have any clinical trials been conducted at this CTS in the past?				
If yes, how many clinical trials were conducted? Give details of the PI as well as nature and duration of the clinical trials.				
How many other studies currently ongoing at the site? If yes, how many clinical trials were conducted? Give details of the PI as well as nature and duration of the clinical trials.				
Is there a pharmacy / dedicated investigational products dispensing area?				
If yes, does the CTS have required storage facility for routine operations?				
If yes, does the CTS have required trial related Investigational Product storing facility? (Investigational Product Provided by the sponsor as per requirements of the protocol).				
Does the CTS have Laboratory services?				
If yes, is in house or central?				
Is there an X-Ray facility?				

If yes, is it on-house or central?				
Does the facility have an incinerator? If yes, document the average weight of Hospital waste disposed of per month.				
If No, does the facility', have a contract with a Hospital waste management Company?				
<b>ii. Study Related Staff</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Does the CTS have, any of the study related personnel on staff? -Principal Investigator (PI) -Sub-Investigator (Sub-PI) -Coordinator -Nurses -Pharmacists. *Give details in remarks Section				
Are CVs available for Key staff members (PI, Sub-PI, Coordinator)				
<b>iii Education and Training</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Have CTS personnel received or are scheduled to receive any of following trainings? o GCP o Trial related o Safety reporting o Pharmacovigilance Training o Other				
Are training records available for study related staff?				
Security and confidentiality is adequate to prevent unauthorized access to records?				
Is there sufficient space to store materials, archive records, equipment to function properly?				
Are generators and/or UPS available utilized at the facility?				
<b>iv. Safety</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a system in place for personnel to report any safety concern or incidents?				
<b>v. Data Handling procedures and Computer Validation</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Does the CTS have adequate IT facilities e.g. Computers, internet available?				
Is access to computers limited by an individual username and password system (Clinical Research team members cannot share a user name)?				
<b>vi. Records and Reports</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>



Is there space available for document storage?				
If yes, do access control systems to the area exist and are functional?				
Is there a SOP or a system for the retention, storage, and destruction of records?				
How does the site ensure the sponsor's proprietary information is not disclosed to unauthorized personnel or external organizations?				
<b>vii. Records Retention and Archival</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a dedicated facility/area for the archival of records?				
Is there control access to the archival facility?				
Is the environment of the facility monitored and controlled?				
Is the retention time for records agreed with the sponsors?				
Is there a method of electronic data archive (if required)?				

**Remarks of inspection team:**


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**Concluding status of inspection / application:( Circle One)****Recommended for approval**☐**Deferred for improvements**☐**Recommended for rejection**☐**Name****Signature**

Inspector:

Inspector:

Inspector:

Inspector:

**22.12 Annex- XI-Bio Analytical Laboratory Checklist**

**LABORATORIES FOR CLINICAL RESEARCH (LAB) INSPECTION**  
**CHECKLIST**

Name of facility: \_\_\_\_\_

Address: \_\_\_\_\_

Organization Type: - Public ☐ Not for Profit ☐ Private ☐ Other- \_\_\_\_\_

Name of Owner / Proprietor: \_\_\_\_\_

Date of inspection: \_\_\_\_\_

(dd/mm/yyyy)\_

<b>i. General organization of the site Activity</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is the scope of lab functions well defined?				
Is the site already well equipped and has adequate facilities?				
Are the algorithms for analysis well defined in any manual or SOP?				
Is the facility registered with the Healthcare Commission?				
If yes, is the certificate available for review and is valid?				
<b>ii. Personnel</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Are Organization charts, valid at the time of the inspection and at the time when the inspected study was conducted?				
Is there documentation of the number and qualifications of people employed?				
Is the training and experience of the personnel, individual work load of people involved, documented?				
Are CVs available for key staff members (Lab Director, Lab Manager Pathologists etc.)				
<b>iii. Education and Training</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Have Lab personnel received or are scheduled to receive any of following trainings? <ul style="list-style-type: none"> <li>• GLP</li> <li>• Trial related</li> <li>• Safety reporting</li> <li>• Other</li> </ul>				

<b>iv. Quality assurance system</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is there a quality assurance system in place at the laboratory?				
Do they have SOPs that are available, accessible and valid for laboratory operation?				
Are people in charge aware of the SOPs?				
Is there a change control system for SOP/Methods?				
<b>v. Installations and equipment</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is the facility suitable, equipment available and appropriate for the activity of the laboratory? (This includes energy sources, environment, lighting, test equipment and its calibration)				
<b>vi. Archiving of documentation</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
What is the nature of the documents kept?				
Is there dedicated place of archiving documents?				
Is there access control to that archiving place?				
Is there adequate? Protection of the documents?				
Is there person responsible for the archives identified and documented?				
Is there documentation of file movements?				
Is there an SOP as to how long the records will be maintained? State in remarks the average retention time.				
<b>vii. Sample tracking Receipt</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is there a responsible person identified and documented for receipt and handling of biological samples?				
Is there an organized receipt system, and tracking of samples?				
Is there a sample registration system?				
Are dates and times of receipt of the samples, and acknowledgement of receipt documented?				
Is there a list of samples received for each dispatch?				
Is there any protocol of maintaining and monitoring shipment conditions?				
Are there any anomalies noted?				
Is the condition of the samples on receipt documented?				
<b>viii. Storage</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Are storage conditions of the study samples satisfactory?				
Do the storage conditions of the samples comply with the protocol?				

Is there assessment of the risk of confusion between samples?				
Is there Identification of the freezer(s) used including model #?				
Are there temperature records of the freezer?				
Is there calibration of the thermometer and its traceability to national/international Standards?				
Are there alarms and other surveillance measures?				
Are the samples labeled, if they are still available?				
Is there documentation of freeze / thaw cycles undergone by the samples?				
<b>ix. Equipment</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is there Identification of the equipment (make, model)?				
Is equipment for the study available at the site at the time of inspection?				
Are instructions for equipment use available?				
Does the equipment comply with specific conditions necessary for the clinical studies?				
Is there documentation relating to the qualification, checks, and maintenance of the equipment available?				
<b>x. Calibration of Equipment</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is the equipment compared and calibrated by a 3 <sup>rd</sup> party?				

**Remarks of inspection team:**


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**Concluding status of inspection / application:( Circle One)**

Recommended for approval ☐

Deferred for improvements ☐

Recommended for rejection ☐

**Name****Signature**

Inspector:

Inspector:

Inspector:

Inspector:



**22.13 Annex-XII-BA/BE Studies Centers Inspection Checklist****BIO-AVAILABILITY OR BIO-EQUIVALENCE STUDIES CENTER  
(CENTER) INSPECTION CHECKLIST**

Name of facility: \_\_\_\_\_

Address: \_\_\_\_\_

Organization Type: - Public ☐ Not for Profit ☐ Private ☐ Other- \_\_\_\_\_

Name of Owner / Proprietor: \_\_\_\_\_

Date of inspection: \_\_\_\_\_  
(dd/mm/yyyy)\_**A. CONDUCT OF INSPECTION OF CLINICAL PART OF BIO-EQUIVALENCE STUDIES**

<b>i. Organizational Aspects: Implementation of the BE studies at the clinical site</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Are organization charts (facility management and scientific organization charts) available?				
Is there documentation of delegation of responsibilities by the principal investigator?				
Are there systems for QA and QC in place?				
Are disaster plans (e.g. handling of defective equipment and consequences) including first aid in place?				
Is staff qualification, responsibilities, experience, availability, training programs, training records, CV available for review?				
Have any BE studies already been performed here? If yes, what are their number, nature and records if any?				
What proportion of time is allocated to BE study work? (Enter in remarks section)				
Are there contracts between the sponsor or sponsor's representative and the investigator?				
Does the investigator/s tenant have qualifications and experience in the considered clinical area?				
<b>Organizational Aspects: Implementation of the BE studies at the clinical site</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is there documentation describing the distribution of duties and functions for the conduct of the BABE study?				
Is there compatibility of the workload of the investigator and the staff with the requirements of the study?				



Is the site organized for the study (organization chart, specific training, specific equipment, specific Procedures)?				
Does the site comply with planned time schedule for the study?				
Are correct versions of the protocol and its amendments implemented Correctly?				
<b>ii. Facilities and equipment</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
What equipment is being used? List in detail in remarks section or provide list.				
Are investigation up-to-date?				
Are the facilities suitable for the protocol requirements and the characteristics of the study being inspected?				
<b>iii. Management of biological samples</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is there documentation available for person in charge of collecting biological samples with dates and handling procedures?				
Is there devised protocol and documentation for storage of the samples before analysis or shipping?				
Are the shipping conditions for biological samples maintained and monitored to prevent degradation?				
<b>iv. Organization of the Documentation</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Are the medical reports (Patient's charts, X-ray, etc.)? Available, complete and archived?				
Are there informed consent documents available?				
Are there Case Report Forms (CRF) in records?				
<b>v. Monitoring and auditing</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is there monitoring and follow up by the sponsor?				
Is SOP and method of study monitoring available by the sponsor?				
Are there QA certificates from research organization available?				
<b>vi. Use of computerized systems</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/ Recommendations</b>
Is a computerized system being used for the BE study? If yes, what is its validation status, version and mode				
<b>vii. Informed consent of subjects</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>

Are the signed and self-dated (by the subject and by the person who conducted the informed consent discussion) consent form actually used and approved by the IEC/IRB?				
Is the patient information sheet actually used and approved by the IEC/IRB?				
Does the center give copy of the informed consent to the patient/attendant?				
<b>viii. Characteristics of the subjects included in the BA/BE study</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Are the subjects nominated for the study actually on board and participating in study?				
Is the subject's participation recorded in their medical records				
Do the subjects included fulfill the inclusion criteria and none of the exclusion criteria stated in protocol?				
<b>ix. Subject's Visits Calendar</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there subjects visits calendar available for review and is compiled				
<b>x. Efficacy and safety assessment data</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is the efficacy and safety data recorded in the CRF in agreement with the source medical data obtained during the BE study				
Are adequate data management procedures in place?				
Is the protocol established for reporting the adverse and side reactions? Mention reporting channel in remarks				
<b>xi. Concomitant therapy and intercurrent illness</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Were concomitant therapy and intercurrent illnesses managed in compliance with the protocol and recorded in the CRF and source medical documents				
<b>xii. Management of the investigational products</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Are there instructions for handling of investigational product(s) and study related materials (if not included in protocol or investigators brochure)?				
Are shipping records for investigational product(s) and study related material available? (Receipt, date(s) of product delivery and quantity, batch (or lot) numbers {check correspondence with the information kept at the sponsor site}, expiration dates and codes assigned to the product and the subject)				

Is there documentation regarding allocation of treatment, randomization and code blinding available?				
Is there investigational product(s) accountability at site (pharmacy or investigator)?				
<b>Management of the investigational products</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
is the date and quantity of investigational Product dispensed or returned, identification of recipients (patient's code or authorized Persons) documented? (Should also contain batch (or lot) numbers, expiration dates and codes assigned to the product and the subject)				
Is there documentation about relabeling, if Applicable?				
Is there documentation on date and quantity of investigational product returned to the sponsor? (Return receipt, batch (or lot) numbers, Expiration dates and codes assigned to the product and the subject )				
Is there documentation of dates, batch (or lot) numbers and quantity of investigational product (s) destruction? (if destroyed at the site)				
Is there documentation of treatment compliance?				
Is there a check on suitability of storage conditions and their records (fridge, freezer and controlled substances, etc.)				
If yes to above, are there specific SOP's for this activity from the pharmacy or institution?				
Is there documentation whether there was controlled access to the investigational product(s) from reception to dispensing?				
Is there documentation of certification of the labeling for compliance with applicable regulations?				

## **B. CONDUCT OF INSPECTION OF BIOANALYTICAL PART OF BIO-EQUIVALENCE STUDIES**

<b>i. General organization of the site Activity</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is the scope of laboratory and functions well defined?				
Is the site already well-equipped and has adequate facilities?				
Are the algorithms for analysis well defined in any manual or SOP?				
<b>ii. Personnel</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>

Are organization charts, valid at the time of the inspection and at the time when the inspected study was conducted?				
Is there documentation of the number and qualifications of people employed?				
Is the training and experience of the personnel, individual work load of people involved documented?				
<b>iii. Quality assurance system</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a quality assurance system in place at the laboratory?				
Does the center have SOP's that are available, accessible and valid for study?				
Are people in charge aware of the SOPs is there a change control system for SOP/Methods?				
<b>iv. Installations and equipment</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is the facility suitable, equipment available and appropriate for the activity of the laboratory and for the Bio-equivalence study to be inspected during the inspection? (This includes energy sources, environment and its calibration)				
<b>v. Archiving of documentation</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
What is the nature of the documents kept				
Is there dedicated place of archiving documents?				
Is there access control to that archiving documents				
Is there adequate protection of the documents				
Is there person responsible for the archives identified and documents?				
Is there documentation of file movements?				
Is there an SOP as to how long the records will be maintained State in remarks the average retention time?				
<b>vi. Sample tracking receipt</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a responsible person identified and documented for receipt and handling of biological samples?				
Is there an organized receipt system, and tracking of samples?				
Is there a sample registration system?				
Are controls performed on receipt?				
Are dates and times of receipt of the samples, and				

acknowledgement of receipt documented?				
Is there a list of samples received for each dispatch?				
Is there any protocol of maintaining and monitoring shipment conditions?				
Are there any anomalies noted?				
Is the condition of the samples on receipt documented?				
<b>vii. Storage</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Are storage conditions of the BE study samples satisfactory?				
Do the storage conditions of the samples comply with the protocol and the conditions used during BE study inspected?				
Is there assessment of the risk of confusion between samples?				
Is there identification of the freezer(s) used including model#				
Are there temperature records of the freezer?				
Is there calibration of the thermometer and its trace ability to national international standards?				
Are there alarms and other surveillance measures?				
Are the samples labeled, if they are still available?				
Is there documentation of freeze/thaw cycles undergone by the samples				
<b>viii. Destruction</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there documentation of date of destruction or return of the samples				
<b>ix. Sample analysis Bio analytical method used</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is the BE study report consistent with the SOP describing the bio analytical methods and other documents?				
If yes to above are documents available?				
<b>x. Equipment</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there identification of the equipment (make, model)?				
Is equipment for the study available at the site at the time of inspection?				
Are instructions for equipment use available				
Does the equipment comply with specific conditions necessary for the BE study?				
Is there documentation relating to the qualification checks and maintenance of the equipment available?				
<b>xi. Reagents</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Are the reagents labeled properly				

including the expiry date?				
Is there traceability of the reagents use?				
Is there compliance with specific conditions? if any				
<b>xii. Reference standard</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Are contents of the certificates of analysis and expiry dates documented and available				
Are the storage conditions optimal?				
Are the conditions for access to reference standard optimal?				
<b>xiii. Calibration, control samples</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Are there dates and conditions of preparation of the stock and working solutions and of the calibration and control samples and the number of aliquots prepared for each sample documented?				
Are the Conditions and duration of storage of the stock solutions, working solutions optimal?				
Are calibration and control samples, compared to their stability, as described in the validation report?				
Is there any matrix used? Mention details if applicable				
Is the number of calibration samples documented? Mention number for each run.				
Is the response function used, including weighting used for each run, if any?				
Is there an acceptance criterion for the calibration curve?				
Is there a criterion for exclusion of calibration samples?				
<b>xiv. Development of the method</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a quick overview of the origin and of the development of the Bio analytical method can be helpful to identify critical steps in the procedure?				
<b>xv. method validation</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there method validation protocol?				
Are there dates of the validation documented?				
Is there adequate documentation of all operations?				
Is there completeness of the validation report, when compared to the various experiments performed?				
Is there consistency of the validation report with the source documents?				
Is there Chromatogram integrations?				
Is there exclusion of calibration samples, if any?				
Is there stability of: 1. The stock solutions? 2. The samples (bench- top, freeze/thaw cycles,				

long term)?				
3. Extracted samples before their injection, if applicable?				
Is there Specificity / selectivity?				
Is there accuracy?				
Is there Limit of quantification?				
Is there Response function Carry-over?				
In case of mass spectrometric methods: matrix?				
Is there Effect of a dilution, if applicable?				
Is there effect of the anticoagulant, if the anticoagulant used for the preparation of the calibration and/or QC samples is different from the anticoagulant used to collect samples during the study?				
<b>xvi. Assays</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is nature and completeness of the documentation available?				
Is there adequacy of the documentation of all operations?				
Is there completeness of the analytical report?				
Is there number, date and composition of the analytical runs?				
Is there Identification of samples and tubes?				
Is there any method for the Assessment of the risk of sample mix-ups?				
Is there any method for assessment of the risk of sample cross contamination?				
Are there Chromatogram integrations?				
Is there Calculation of the concentrations?				
Is there Compliance with pre-defined criteria for the exclusion of calibration samples?				
Are there Criteria of acceptance of the runs, and compliance with pre- established criteria?				
Is there audit trail settings and information recorded in the audit trails?				
Is there Maintenance of blinding, if required by the protocol?				
Are there practicalities of data transfer?				
Is there consistency of the analytical report with the source documents?				
<b>C. CONDUCT OF INSPECTION OF PHARMACOKINETIC AND STATISTICAL ANALYSES PART OF BIO-EQUIVALANCE STUDIES</b>				
<b>i. Pharmacokinetics</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a quality system in place?				
Are personnel involved identified, their qualifications documented and responsibilities clearly stated?				
Is software used?				



Is there software validation system documented?				
Is the software practical and has enough controls of data entry?				
Are sampling times used?				
Is data selected for the calculation of the terminal half-life, if applicable?				
Is the raw data consistent with study report?				
<b>ii. Statistics</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Observations/Recommendations</b>
Is there a quality system in place?				
Are personnel involved identified, their qualifications documented and responsibilities clearly stated?				
Is software used?				
Is the software practical and has enough controls of data entry?				
Are sampling times used?				
Are there Data line listings and tables of results?				
Is there consistency of the raw data with the calculated pharmacokinetic parameters and with the study report?				

**Remarks of inspection team:**


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**Concluding status of inspection / application:( Circle One)****Recommended for approval**☐**Deferred for improvements**☐**Recommended for rejection**☐**Name****Signature**

Inspector:

Inspector:

Inspector:

Inspector:

## 22.14 Annex-XIII-Template for IRB/ERC ethical approvals

- All stakeholders generally and IRB/ERC specifically are advised to adopt following format for IRB/ERC certificate/approvals for uniformity (across country) and more clarity regarding ethical and regulatory approvals.
- Template for IRB/ERC approvals is as follows:

[Insert Name Institutional logo]

[Insert Date]

[Insert Principal Investigator's name]

[Address of Principal Investigator]

Dear [PI name],

[IRB/ERC Approval Reference Number],

[Trial/Study Title]

Thank you for submitting your application for ethical approval regarding the above-mentioned clinical trial/study.

Your study was reviewed and discussed in IRB/ERC meeting number [Meeting Number], dated [Insert date]. All study related documents submitted, reviewed by the IRB/ERC and found no ethical issues in the trial/study. The study was given an approval for a period of one year with effect from [Insert date]. For further extension in trial duration, PI will submit trial progress/annual report.

List of document(s) approved by the IRB/ERC is as follows:

S. No.	Trial related Submitted Document Name	Document Date	Document Version

Any changes in the protocol or extension in the period of study should be notified to the Committee for prior approval. All informed consents should be retained for future reference.

It is declared that, none of the IRB/ERC member(s) involved in conduct of above mentioned clinical trial in any means.

It is informed to PI that it is an institutional ethical approval of the protocol only, please ensure to get ethical approval from National Bio-Ethics Committee and regulatory approval from the Drug Regulatory Authority of Pakistan before trial initiation as per institutional and national regulatory requirements.

Thank you.

Sincerely,

Signature of [IRB/ERC Chairperson]

Name of [IRB/ERC Chairperson]

[Designation of ERC Chairperson]

## 22.15 Annex-XIV-Template for IRB/ERC Members Composition Notification

- All IRB/ERC notifying bodies/organizations/healthcare facilities are advised to adopt following format for IRB/ERC (Composition) Notification for uniformity (across country) in reference to format and clarity regarding composition following the Bio-Study Rules, 2017.
- It should be ensured before IRB/NBC notification that none of the members have any possible conflict of interest.
- IRB/NBC notification should be on institute letter head duly signed and stamped by competent authority.
- Any institution involved in conduct of clinical trials may notify more than one IRBs/ERCs as per their requirements and avoiding any conflict of interest.
- Template for IRB/ERC approvals is as follows:
- 

[Insert Institution Name & Logo]

Member's List

Institutional Review Board/Ethic Review Committee

[Insert Number], [Insert Tenure of the Committee]

S. No.	Name of Members	Designation	Department/Organization	Qualification	Tenure-ship (Start Date – End Date)

### Term of reference of the IRB/ERC:

- [.....]
- [.....]
- [.....]
- [.....]
- [.....]

Authority

Name & Designation of Competent

Authority

Signature & Stamp of Competent

## 22.16 Annex-XV-Format/Template for Progress / Quarterly Progress Report

- All stakeholders generally and trial Principal Investigators specifically are advised to adopt following format/template for progress/quarterly progress reports, to be submitted to the DRAP for uniformity (across country) and more clarity and regulatory compliance.
- All type of progress report should be forwarded with a cover letter from PI on institute's letter head. Template/format for progress/quarterly progress report is as follows:

### CLINICAL TRIAL/STUDY PROGRESS/QUARTERLY PROGRESS REPORT

[Reporting tenure, (Insert reporting duration with dates)]

<b>PART A: STUDY OVERVIEW</b>	
<b>1</b>	<b>DRAP Approval Reference number</b>
<b>2</b>	<b>Study Title</b>
<b>3</b>	<b>Protocol number &amp; Version</b>
<b>4</b>	<b>Protocol amendment detail along with amended protocol version and dated.</b>
<b>5</b>	<b><i>Details of Sponsor / Applicant:</i></b>
5.1	Name of Sponsor
5.2	Name of Applicant/PI
5.3	Contact Person
5.3.1	Telephone number
5.3.2	Cell-phone number
5.3.3	E-mail address
<b>6</b>	<b>List of all active trial sites, address and Principal Investigators (PIs)</b>
<b>7</b>	<b><i>Trial Information:</i></b>
7.1	Date of approval of study
7.2	Treatment hold (if applicable) with reasons (start date and stop date of hold should be included)
7.3	Expected date of completion
<b>8</b>	<b><i>Number of participants in the trial (per site), (this section should be accumulative):</i></b>
8.1	Screened (signed consent)
8.2	Randomised
8.3	Withdrawn from treatment (continue in follow up), with reasons
8.4	Withdrawn from study (early termination), with reasons
8.5	Study completed
8.6	Lost to follow-up
8.7	Deaths
<b>9</b>	<b>Applicant/Sponsor comment on progress to date</b>

<b>10 Summary Data Safety Monitoring Board (DSMB) or Safety Committee recommendations</b>	
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<b>PART B: OVERALL SAFETY LINE LISTING</b>		
<b>11 Safety Line Listing of all Serious Adverse Events (SAEs) and Suspected Unexpected Serious Adverse Reactions (SUSARS) for all participants per site in this study in Pakistan.</b> <i>Note: Detailed Site-Specific Line listing may be submitted as an attachment (should not be accumulative) as per Safety Reporting guideline</i>		
<b>SAEs and SUSARS</b>	<b>Relationship to study medicine (investigator's opinion)</b>	<b>Outcome(s)</b>
<b>Any safety issues of special concern outside Pakistan</b>		
<b>12 Line Listing of all critical and major protocol violations at the site:</b> Protocol <i>Violation</i> is any change, divergence, or departure from the study design or procedures defined in the protocol that might significantly affect participants' safety, and well-being and/or the reliability of the study data.  Protocol <i>Deviation</i> is accidental or unintentional changes to, or non-compliance with the research protocol that does not increase risk or decrease benefit or does not have a significant effect on the participants, safety or well-being; and/or the reliability of the study data.		
<b>Critical and Major Protocol Violations</b>	<b>Resolution/Action taken</b>	
Please refer to attached for Critical and Major Protocol Violations for above mentioned sites		
<b>13 Lead Site Principal Investigator comment on other major safety concerns (this should include information impacting on the risk-benefit profile, including changes in nature, severity or frequency of risk factors, etc.)</b>	<b>(Provide detailed text here)</b>	
<b>Signature of Lead / Site Principal Investigator</b>		<b>Date</b>
<b>Signature of Applicant/Sponsor</b>		<b>Date</b>
<b>FOR DRAP USE ONLY:</b> <b>Comments (if any):</b> <b>Action recommended:</b> <input type="checkbox"/> No major protocol deviation & IMPs related SAEs found, Trial may continue <input type="checkbox"/> Further information required from Applicant / Sponsor <input type="checkbox"/> Refer to Clinical Studies Committee for information only <input type="checkbox"/> Refer to Clinical Studies Committee for information review and decision  <b>Reviewed by (Name &amp; Designation):</b> ..... <b>Signature:</b> ..... <b>Date:</b> .....		

## 22.17 Annex-XVI-Template for Clinical Study Report

- All stakeholders generally and trial Principal Investigators specifically are advised to adopt following format/template for Clinical Study Report, to be submitted to the DRAP for uniformity (across country) and more clarity and regulatory compliance.
- Clinical Study Report (along with its scanned copy) should be forwarded with a cover letter from PI on institute's letter head. Template/format for Clinical Study Report is as follows:

### CLINICAL STUDY REPORT

1. Title Page
2. Synopsis
3. Table of Contents
4. List of Abbreviations and Definitions of Terms
5. Ethics
  - 5.1. Independent Ethics Committee/IRB Review
  - 5.2. Informed Consent
  - 5.3. Ethical Conduct of the Study
  - 5.4. Patient Confidentiality
  - 5.5. Protocol Amendments
6. Study Administrative Structure
7. Introduction
  - 7.1. Study Rationale
  - 7.2. Rationale for Study Indication
  - 7.3. Rationale for Study Endpoint
  - 7.4. Benefit/Risk Assessment
8. Study Objectives
  - 8.1. Primary Objective(s)
  - 8.2. Secondary Objective(s)
  - 8.3. Exploratory Objective(s)
9. Investigational Plan
  - 9.1. Overall Study Design and Plan
  - 9.2. Discussion of Study Design including choice of Control Groups and Justification for Dose
  - 9.3. Selection of Study Population
  - 9.4. Treatments Administered
    - 9.4.1. Dosing Instructions
    - 9.4.2. Identity of Investigational Product(s)
    - 9.4.3. Dose Modification
    - 9.4.4. Preparation/Handling/Storage/Accountability
    - 9.4.5. Measures to minimize bias
    - 9.4.6. Selection and Timing of Dose
    - 9.4.7. Prior and Concomitant Therapy
    - 9.4.8. Treatment Compliance
  - 9.5. Efficacy and Safety Variables
  - 9.6. Data Quality Assurance
  - 9.7. Statistical Methods
  - 9.8. Changes in the conduct of the study or planned analyses

## **10. Study Patients**

### **10.1. Disposition of Subjects**

### **10.2. Protocol Deviations**

## **11. EFFICACY EVALUATION**

### **11.1. Data Sets Analyzed**

### **11.2. Demographic and Baseline Characteristics**

### **11.3. Measurement of Treatment Compliance**

### **11.4. Efficacy Results and Tabulations of Individual Patient Data**

#### **11.4.1. Analysis of efficacy**

#### **11.4.2. Statistical/analytical issues**

#### **11.4.3. Tabulation of individual response data**

#### **11.4.4. Drug dose, drug concentration, and relationships to response**

#### **11.4.5. Drug-drug and drug-disease interactions**

#### **11.4.6. By-patient displays**

#### **11.4.7. Efficacy conclusions**

#### **11.4.8. Efficacy/Immunogenicity/Pharmacokinetic/Evaluation**

#### **11.4.9. Efficacy results**

#### **11.4.10. Pharmacokinetic and Immunogenicity Analyses**

## **12. SAFETY EVALUATION**

### **12.1. Extent of Exposure**

### **12.2. Adverse Events**

### **12.3. Analyses of Serious Adverse Events, Deaths, Discontinuation of treatment**

### **12.4. Clinical Laboratory Evaluation**

### **12.5. Vital Signs, ECGs, and Other Safety Parameters**

### **12.6. Safety Summary**

### **12.7. Adverse Events (AEs)**

### **12.8. Deaths, Other Serious Adverse Events, and Other Significant Adverse Events**

## **13. Discussion and Overall Conclusions**

## **14. Tables, Figures, and Listings**

## **15. References**

## **16. Appendices**

**Note for Applicants of Clinical Study Report: For details regarding Clinical Study Report template, please refer to ICH E3 Guideline (Guideline for Industry; Structure and Content of Clinical Study Reports)**



Division of Pharmacy Services  
**DRUG REGULATORY AUTHORITY OF PAKISTAN**  
Prime Minister's National Health Complex,  
Park Road,  
Islamabad, Pakistan.  
Email: [dir.ps@dra.gov.pk](mailto:dir.ps@dra.gov.pk)  
Phone: 92-51-9255980  
[www.dra.gov.pk](http://www.dra.gov.pk)