

Regulations for Work Procedures and Technical Requirements for Drug Registration Testing (2025 Revision)¹

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I. Purpose

In order to implement the provisions concerning drug registration testing as set forth in the *Measures for the Administration of Drug Registration* (Order No. 27 of the State Administration for Market Regulation), to ensure alignment with the relevant requirements for drug review and approval, to further standardize the work procedures for drug registration testing, and to clarify the applicable technical requirements, these Specifications are hereby formulated.

II. Definitions and Scope of Application

(I) Definitions

For the purposes of these Specifications, drug registration testing includes *sample testing* and *standard verification*.

Sample testing refers to laboratory testing conducted on samples in accordance with the drug quality standards as declared in the application dossier or as approved by the competent authority.

Standard verification refers to laboratory-based evaluation of the scientific validity of the test items specified in the declared drug quality standards, the feasibility of the analytical methods, and the rationality of the quality control specifications, among other technical aspects.

(II) Scope of Application

These Specifications shall apply to registration testing conducted by drug control institutions in support of the review and approval of marketing authorization applications for traditional Chinese medicines (including Chinese medicinal materials and prepared slices of Chinese crude drugs subject to approval-based administration), chemical drugs (including chemical active

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pharmaceutical ingredients), biological products, and in vitro diagnostic reagents administered as drugs.

These Specifications shall also apply to registration testing conducted in support of the review and approval of post-marketing supplemental applications and re-registration applications for the above-mentioned products.

In addition, these Specifications shall apply to registration testing conducted in support of the associated review and approval of chemical active pharmaceutical ingredients, pharmaceutical excipients, and packaging materials and containers in direct contact with drugs (hereinafter collectively referred to as “drug packaging materials”) in relation to finished pharmaceutical preparations.

III. Classification of Drug Registration Testing

Based on the initiating authority and the stage of drug registration at which the testing is commenced, drug registration testing is principally classified into the following categories:

(I) Pre-Acceptance Registration Testing

Pre-acceptance registration testing refers to drug registration testing initiated by the applicant prior to the formal acceptance of a drug registration application (including marketing authorization applications and post-marketing supplemental applications).

Upon completion of pharmaceutical studies supporting marketing authorization, finalization of the drug quality standards, completion of validation of the commercial-scale manufacturing process, or completion of the necessary studies supporting a post-marketing supplemental application, the applicant may submit an application for drug registration testing to the National Institute for Food and Drug Control (hereinafter referred to as the “NIFDC”) or to the provincial drug regulatory authority.

Applicants are encouraged to apply for pre-acceptance registration testing for drugs included in the priority review and approval procedure.

(II) Registration Testing Initiated Upon Acceptance

Registration testing initiated upon acceptance refers to drug registration testing commenced by the Center for Drug Evaluation (hereinafter referred to as CDE”) at the time of acceptance of a drug registration application (including marketing authorization applications and post-marketing supplemental applications) through the issuance of a Notice of Drug Registration Testing.

(III) Registration Testing During Review

Registration testing during review refers to testing initiated by the CDE in the course of technical review of a drug registration application (including marketing authorization

applications and post-marketing supplemental applications), based on risk considerations. Such testing includes:

1-Verification of drug quality standards and sample testing conducted in conjunction with on-site inspections;

2-For-cause sample testing initiated as required for review purposes, including circumstances where the authenticity of submitted application materials is in doubt or where complaints or reports have been received.

In addition, in circumstances such as re-registration, cases where post-marketing registration testing tasks remain outstanding, or filings involving moderate changes, registration testing may be initiated by the CDE or by the provincial drug regulatory authority as deemed necessary for review and approval purposes.

IV. Requirements for Applicants for Drug Registration Testing

(I) Applicant Qualification

The applicant for drug registration testing (hereinafter referred to as the “Applicant”) shall mean the enterprise, drug research and development institution, or other entity that submits the application for registration testing. The Applicant shall be the same entity as the applicant for the corresponding drug registration application.

(II) Requirements for Submitted Drug Quality Standards

The drug quality standards submitted for registration testing shall comply with the relevant technical requirements of the *Pharmacopoeia of the People’s Republic of China* (hereinafter referred to as the “Chinese Pharmacopoeia”) and shall not be lower than the standards prescribed therein. In addition, such standards shall conform to the general format and drafting guidelines for drug quality standards as issued by the drug evaluation authority.

Where the test items or specifications for the declared product are not applicable to the Chinese Pharmacopoeia, the Applicant shall provide adequate supporting data and justification.

The drug quality standards submitted for registration testing shall be consistent with:

-The quality standards submitted to the drug evaluation authority;

-The corresponding pharmaceutical research documentation relating to the declared drug quality standards.

The Applicant shall conduct a rigorous internal review of the drug quality standards prior to submission for registration testing. Where corrections are genuinely required in the quality standards—such as typographical errors, omissions, incorrect punctuation, unit symbols, or

supplementary explanatory materials—the Applicant may simultaneously apply to the drug control institution and the drug evaluation authority for correction or clarification.

(III) Special Considerations for Pre-Acceptance Testing of Post-Marketing Supplemental Applications

For pre-acceptance registration testing relating to post-marketing supplemental applications, the Applicant shall conduct an assessment in accordance with the relevant technical guidelines for post-approval changes to marketed drugs and, where necessary, maintain adequate communication with the drug evaluation authority or the provincial drug regulatory authority.

(IV) Sample Submission and Cooperation

The Applicant shall actively cooperate with the drug regulatory authority (or its authorized entity) in the sampling process, whether through official sampling or self-sampling as required. The Applicant shall deliver the required documentation, samples, reference standards, and any special testing materials to the designated drug control institution in accordance with applicable storage and transportation requirements.

(V) Pre-Application Preparation and Ongoing Technical Cooperation

Prior to submitting an application for drug registration testing, the Applicant shall thoroughly ascertain the specific requirements relating to documentation, samples, and reference standards for the product concerned, and shall, where necessary, communicate with the relevant drug control institution in advance.

During the course of drug registration testing, the Applicant shall actively cooperate with the drug control institution and engage in technical discussions as necessary to resolve issues arising in connection with the registration testing process.

(VI) Supplementation of Registration Testing Materials

Where supplementation of materials relating to drug registration testing is required, the Applicant shall, within the prescribed time limit, submit the complete set of supplementary materials in a single submission in accordance with the specified requirements.

(VII) Submission Format and Language Requirements

The Applicant shall provide both hard-copy and electronic versions of the materials for registration testing and the labels for the testing samples. The hard-copy documents shall bear the official seal of the Applicant.

For drugs manufactured overseas and submitted for registration testing, the Applicant shall provide the aforementioned materials and sample labels in both Chinese and English.

Where the drug control institution concerned implements electronic document archiving in accordance with applicable requirements, the Applicant may submit only the electronic version of the required materials.



(VIII) Restrictions on Pre-Acceptance Registration Testing Applications

Prior to the acceptance of a drug registration application (including a marketing authorization application or a post-marketing supplemental application), the Applicant may submit only one pre-acceptance registration testing application to a single drug control institution.

At the time of submitting the drug registration application, the Applicant shall notify the drug evaluation authority of the acceptance information relating to the pre-acceptance registration testing.

Where a pre-acceptance registration testing application has already been submitted, the drug evaluation authority shall, in principle, not initiate registration testing upon acceptance, and the drug control institution shall not accept a duplicate testing application for the same product.

Where pre-acceptance registration testing has been completed, the corresponding drug registration testing report shall be submitted.

(IX) Consistency and Prohibition of Unilateral Changes

The materials submitted for drug registration testing shall be consistent with the corresponding contents of the drug registration application dossier.

During the course of drug registration testing, the Applicant shall not unilaterally:

- Change the designated drug control institution;
- Supplement, modify, or replace submitted materials;
- Replace or alter submitted samples.

V. Division of Responsibilities and Related Requirements for Drug Control Institutions

(I) Division of Responsibilities Among Drug Control Institutions

Drug registration testing shall be undertaken by national, provincial, and port-level drug control institutions established or designated by the drug regulatory authorities.

1-The National Institute for Food and Drug Control (NIFDC) shall be responsible for registration testing of innovative drugs and improved new drugs (excluding traditional Chinese medicines) manufactured domestically or abroad, biological products, and in vitro diagnostic reagents administered as drugs. The NIFDC shall also organize port-level drug control institutions to carry out registration testing of imported drugs that fall under its responsibilities; undertake registration testing of pharmaceutical excipients and drug packaging materials when necessary in connection with associated review procedures; and conduct registration testing of other drugs as prescribed by the National Medical Products Administration (NMPA).



2-Port-level drug control institutions shall participate in registration testing of imported drugs under the organization of the NIFDC.

3-Provincial-level drug control institutions shall be responsible for registration testing of drugs, pharmaceutical excipients, and drug packaging materials within their jurisdiction submitted by applicants or manufacturing enterprises, except for those tasks assigned to the NIFDC or port-level drug control institutions.

4-Registration testing of radiopharmaceuticals shall be undertaken by the NIFDC or by other drug control institutions designated by the NMPA.

(II) Work Requirements for Drug Control Institutions

1-Drug control institutions shall establish work procedures for drug registration testing in accordance with these Specifications and shall comply with the time requirements for such testing. Institutions shall conduct sample testing in accordance with the declared or approved drug quality standards and issue testing reports. In principle, the testing report shall clearly state the testing conclusions, review the declared drug quality standards, and provide specific review opinions (including standardized descriptions of the quality standards), but shall not modify the declared quality standards. Where the Applicant is required to provide supplementary materials before testing can proceed, the institution may carry out registration testing and issue the testing report after the Applicant has formally submitted the supplementary materials in accordance with the requirements, and shall explain the relevant circumstances in the registration testing report form.

2-Drug control institutions shall publicly disclose, on their official websites or at the application acceptance sites, information concerning drug registration testing work procedures, requirements for samples and materials, template documents, timelines, and other relevant information. Institutions shall also, in an appropriate manner, provide Applicants with progress information for the registration testing of their submitted products. The NIFDC shall provide registration testing reports and related information to the Center for Drug Evaluation through the National Medical Products Administration's Drug Supervision Data Sharing Platform (hereinafter referred to as the "Data Sharing Platform"), while provincial drug control institutions shall provide such information to the Center for Drug Evaluation through appropriate means.

3-Drug control institutions shall, as necessary, organize experts in the relevant fields to study important technical issues arising during the registration testing process, review and resolve disputes regarding registration testing reports, and provide conclusions on the handling of such issues.

4-Drug control institutions and their personnel shall maintain confidentiality with respect to materials and samples submitted by Applicants for registration testing, as well as laboratory data generated in connection with such testing, except as otherwise provided by law or where disclosure involves matters of national security or significant public interest.



VI. Work Procedures for Drug Registration Testing

(I) Domestically Manufactured Drugs

1-Preparation of Application

1.1. Preparation of Materials and Samples

For drugs requiring registration testing, the Applicant shall prepare the relevant materials and samples in advance in accordance with the *Measures for the Administration of Drug Registration* and its supporting documents.

1.1.1. For pre-acceptance registration testing and registration testing initiated upon acceptance, the requirements set forth in “Requirements for Materials, Samples, Reference Standards, and Special Experimental Materials for Registration Testing” shall be followed.

1.1.2. For registration testing conducted during the review process, the requirements in Annex 1 shall be applied in accordance with the parts relevant to standard verification of certain items and on-site sampling inspections. Where the Center for Drug Evaluation (CDE) requests for-cause sampling testing beyond the declared drug quality standards, the testing scheme and requirements for materials may be agreed upon with the relevant drug control institution as necessary.

1.2. Communication with Drug Control Institutions

Where necessary, the Applicant may communicate with the relevant drug control institution by telephone, meeting, or written correspondence regarding requirements for registration testing materials, samples, reference standards, special experimental materials, equipment, or technical issues relating to sample testing and standard verification.

For drugs subject to priority review and approval, the Applicant shall inform the drug control institution accordingly.

2-Submission of Application

2.1. Pre-Acceptance Registration Testing Application

The Applicant shall submit a sampling request to the provincial drug regulatory authority where the Applicant or manufacturing enterprise is located. Within five working days of receiving the request, the provincial drug regulatory authority shall organize sampling and sealing in accordance with the prescribed requirements and issue a sampling record certificate.

The Applicant shall then submit an application for registration testing to the corresponding drug control institution in accordance with the division of responsibilities, and deliver the sealed sample, sampling record certificate, materials required for registration testing, and reference standards to the designated drug control institution. The Applicant shall ensure that the declared quality standards and testing methods are not further modified at the time of submission.



2.2. Registration Testing Initiated Upon Acceptance

The Applicant, upon receipt of a Notice of Drug Registration Testing issued by the CDE, shall submit a sampling request to the provincial drug regulatory authority. Within five working days of receipt, the provincial authority shall organize sampling and sealing in accordance with the prescribed requirements and issue a sampling record certificate.

The Applicant shall then submit a registration testing application to the NIFDC or the relevant provincial drug control institution, and deliver the sealed sample, sampling record certificate, materials required for registration testing, and reference standards in accordance with the requirements.

2.3. Registration Testing Application During Review

The Applicant, upon receipt of a Notice of Drug Registration Testing or a Notice for Supplementary Materials issued by the Center for Drug Evaluation (CDE), shall submit a registration testing application to the relevant drug control institution. The requirements for samples, materials, and delivery shall follow the corresponding provisions set forth in Section 2.2 “Registration Testing Application Initiated Upon Acceptance.”

Where the quantity and remaining shelf life of previously submitted samples are sufficient to meet testing requirements, the Applicant may submit a request to the relevant drug control institution to use the original retained samples for testing (Annex 5). Such use shall be permitted only after review and approval by the drug control institution.

3- Acceptance for Review

The applicant shall, in accordance with the requirements set forth in Appendix 1, submit in a single filing all documentation required for registration testing to the designated drug testing institution. Upon successful review and approval of the submitted documentation, the applicant shall subsequently submit the samples for registration testing, reference standards, and any special testing materials.

The drug testing institution shall complete the review of the documentation submitted for registration testing within five (5) working days. Upon receipt of the samples, the institution shall complete the inspection and acceptance of the registration testing samples, reference standards, and special testing materials, and shall issue a determination as to whether the submission is accepted.

3.1 Documentation Review

The submitted documentation shall be reviewed for completeness, compliance, and proper formatting, and review comments shall be provided in a single consolidated response.

During the review process, the drug testing institution shall verify the deadline for submission of supplementary documentation as specified in the Notification for Drug Registration Testing or the Notification for Supplementary Documentation. Where the applicant fails to submit the



required materials within the prescribed time limit, the submission shall not be accepted, and the Notice of Acceptance for Drug Registration Testing shall not be issued.

Where the documentation review is approved, the applicant shall, in accordance with the applicable requirements, submit the samples to the corresponding drug testing institution. Where the documentation review is not approved but supplementation within a prescribed time limit is permitted, the applicant shall, in accordance with the applicable requirements, submit all supplementary materials in a single filing, and thereafter submit the samples to the corresponding drug testing institution. For applications subject to priority review and approval, priority shall be accorded in conducting the review.

3.2 Sample Inspection

The drug testing institution shall inspect the samples with respect to appearance, seal integrity, storage conditions, batch number, quantity, date of manufacture, and expiry date, and shall confirm the inspection results with the applicant by signature. Where the samples meet the applicable requirements, the drug testing institution shall issue to the applicant a Notice of Acceptance for Drug Registration Testing.

Where the samples do not meet the applicable requirements, the drug testing institution shall issue to the applicant a Notice of Non-Acceptance for Drug Registration Testing, stating the reasons therefor. The applicant shall retrieve the submitted documentation, samples, reference standards, and any special testing materials.

3.3 Information Feedback

Where acceptance is granted upon review, a Notice of Acceptance for Drug Registration Testing shall be issued to the applicant. The drug testing institution shall promptly transmit the Notice of Acceptance to the Center for Drug Evaluation and notify it of the date of acceptance.

4-Registration Testing

4.1 Sample Testing and Standard Verification

The technical requirements for sample testing and standard verification shall be as set forth in the relevant provisions under Section VII, Basic Technical Requirements for Drug Registration Testing.

4.2 Drug Registration Testing Report

The drug registration testing report shall include the Drug Registration Testing Report Form, the Sample Testing Report, and/or the Standard Verification Opinion.

Paper-based drug registration testing reports and electronic drug registration testing reports shall have equal legal validity.

The Sample Testing Report shall present the test results in accordance with the submitted or approved quality standards and, in principle, shall provide a conclusion as to whether the sample complies with the submitted or approved quality standards.

4.3 Other Circumstances

4.3.1 Where supplementary registration testing materials, reference standards, or special testing materials are required from the applicant, the drug testing institution shall, after communication with the applicant, make a one-time consolidated request and issue a Notice of Supplementary Materials for Drug Registration Testing, specifying the required content and submission deadline, and requiring the applicant to complete supplementation in a single submission.

Where the applicant fails to complete the supplementation within the prescribed time limit and has not reached prior agreement with the drug testing institution to adjust the deadline, the drug testing institution shall issue a partial testing report covering completed items, and the reasons for inability to complete the remaining items shall be included in the Standard Verification Opinion.

4.3.2 For traditional Chinese medicine and natural drug preparations, where, at the time of application for registration testing, the formulation includes medicinal materials or extracts that have not yet obtained approval or filing with the drug regulatory authority, and where such materials or extracts require testing, such requirements shall be proposed concurrently.

4.3.3 For registration applications for chemical drugs (including marketing authorization applications and post-approval supplemental applications), both chemical drug products and chemical active pharmaceutical ingredients registered on the raw and excipient registration platform but not yet subject to review and approval shall, in principle, be subject to registration testing. Where linked review and approval procedures apply, registration testing of both the active pharmaceutical ingredient and the finished product shall, in principle, be conducted by the same drug testing institution. For chemical active pharmaceutical ingredients used in generic versions of domestically marketed drugs, application for independent registration testing may be submitted in accordance with the testing procedures applicable to similar formulations.

For the registration testing of pharmaceutical excipients and packaging materials, the drug testing institution shall issue a Notification of Drug Registration Testing or a Notification of Supplementary Materials for Drug Registration Testing to the applicant or the registered holder of the pharmaceutical excipient or packaging material, specifying the testing institution and testing requirements. Where no specific testing requirements are provided, a full-item verification shall be conducted in accordance with the quality standards submitted at the time of testing.

4.3.5 For radioactive drugs, the applicant shall consult with the provincial drug regulatory authority, the National Institutes for Food and Drug Control, or a drug testing institution designated by the National Medical Products Administration regarding sampling and sample submission arrangements. Where sample submission for testing is feasible, the applicant shall complete the transfer approval procedures for radioactive substances prior to submitting



samples to the drug testing institution, and shall deliver the samples to the aforementioned drug testing institution within twenty (20) working days after approval. Where sample submission is not feasible due to reasons such as short shelf life, the applicant shall negotiate with the drug testing institution regarding the testing site.

5-Report Transmission

5.1 Upon completion of drug registration testing, the drug testing institution shall issue a Drug Registration Testing Report, including the Drug Registration Testing Report Form, the Sample Testing Report, and/or the Standard Verification Opinion, as applicable.

5.2 The drug testing institution shall determine the recipients of the Drug Registration Testing Report in accordance with the classification of drug registration testing. For pre-submission registration testing, the report shall be transmitted to the applicant and the provincial drug regulatory authority or the Center for Drug Evaluation. For registration testing conducted at the acceptance stage or during the review process, the report shall be transmitted to the Center for Drug Evaluation and the applicant. For re-registration testing and medium-level change filing registration testing, the report shall be transmitted to the applicant and the provincial drug regulatory authority. Where post-marketing registration testing tasks remain, the report shall be transmitted to the applicant. In cases of sampling-based testing, the report shall be transmitted in accordance with the requirements of the authority issuing the Drug Registration Testing Notice.

5.3 The drug testing institution shall adopt appropriate transmission methods to ensure accurate records and traceability of dispatch and delivery times.

5.4 Correction and Reissue of Reports. Where errors arise due to information submitted by the applicant, the applicant shall provide a written explanation, relevant supporting materials, and the originally received testing report. The drug testing institution shall, in accordance with its quality management system requirements, correct the report and reissue the revised version.

Where errors arise due to the drug testing institution, the institution shall correct the report in accordance with its quality management system requirements and reissue the revised version.

In the event of report loss, the applicant may submit a written application for reissue. Upon review and approval, the drug testing institution shall reissue the report in accordance with its quality management system requirements.

(II) Overseas Manufactured Pharmaceuticals

1. Preparation for Application

The provisions under “(I) Domestic Manufactured Pharmaceuticals” in “1. Preparation for Application” shall apply *mutatis mutandis*.

2. Submission of Application

2.1 Pre-registration Testing. The applicant shall submit the relevant registration testing materials online via the NIFDC website and shall provide samples in accordance with the prescribed requirements.

For registration testing organized by the NIFDC and conducted by port drug testing institutions, after completion of document review organized by the NIFDC, the applicant shall submit, under prescribed conditions, samples equivalent to two times the quantity required for full testing under the quality standards, and three times the quantity of reference standards, to the relevant port drug testing institution. In addition, 0.5 times the sample quantity and one time the reference standards shall be submitted, under prescribed conditions, to the NIFDC.

For registration testing conducted by the NIFDC, after completion of document review, the applicant shall submit, in accordance with the requirements, samples equivalent to two times the quantity required for full testing under the quality standards, together with the corresponding reference standards, to the NIFDC.

2.2 Registration Testing at the Acceptance Stage. Upon receipt of the Notice of Pharmaceutical Registration Testing issued by the Center for Drug Evaluation (CDE), the applicant shall submit an application for registration testing to the NIFDC. The applicant shall, in accordance with requirements, dispatch the sampled and sealed (if applicable) samples, together with materials for registration testing, under prescribed conditions to the relevant drug testing institution. The requirements for samples, materials, and delivery shall be the same as those set out in “(II) Overseas Manufactured Pharmaceuticals” under “2.1 Pre-registration Testing.”

2.3 Registration Testing During the Review Stage. Upon receipt of the Notice of Pharmaceutical Registration Testing or the Notice for Supplementary Information issued by the CDE, the applicant shall submit an application for registration testing to the NIFDC. The requirements for samples, materials, and delivery shall be the same as those set out in “(II) Overseas Manufactured Pharmaceuticals” under “2.1 Pre-registration Testing.”

Where the quantity and remaining validity period of the originally submitted testing samples are sufficient to meet testing requirements, the applicant may apply to the NIFDC for the use of retained original samples for testing. Such use may be permitted upon review and approval.

3. Receipt and Review

3.1 Document Review. The NIFDC shall, within five working days, complete or organize port drug testing institutions to complete the review of the completeness and compliance of the materials related to registration testing. Where the materials meet the requirements, the “Task Order for Registration Testing of Overseas Manufactured Pharmaceuticals” shall be issued and the applicant shall be notified accordingly. The document review shall be conducted in accordance with “(I) Domestically Manufactured Pharmaceuticals” under “3.1 Document Review.”



3.2 Sample Inspection. For registration testing organized by the NIFDC and conducted by port drug testing institutions, the relevant port drug testing institution shall, upon receipt of samples and reference standards, complete the inspection and acceptance of the samples and issue a conclusion to the applicant on whether the samples are accepted. The procedures for sample inspection and acceptance shall be the same as those set out in “(I) Domestically Manufactured Pharmaceuticals” under “3.2 Sample Inspection.”

3.3 Information Feedback. Where the receipt and review are successfully completed, the “Notice of Acceptance for Pharmaceutical Registration Testing” shall be issued to the applicant, and such notice shall be promptly communicated to the Center for Drug Evaluation, indicating the date of acceptance.

4. Registration Testing

4.1 Sample Testing and Related Matters. The provisions concerning sample testing, standard verification, issuance of testing reports, and other circumstances arising during registration testing shall be implemented in accordance with “(I) Domestically Manufactured Pharmaceuticals” under “4. Registration Testing.” Where supplementary testing materials are required, the undertaking port drug testing institution shall, in accordance with the requirements, directly issue a “Notice for Supplementary Materials for Pharmaceutical Registration Testing” to the applicant.

4.2 Review of Quality Standard Verification Opinions. The NIFDC shall organize port drug testing institutions to carry out registration testing and the review of opinions on quality standard verification.

5. Dispatch of Reports

5.1 The port drug testing institutions shall submit the sample testing reports and/or opinions on standard verification arising from the registration testing they undertake to the NIFDC. The NIFDC shall be responsible for the consolidated dispatch of registration testing reports, including the Pharmaceutical Registration Testing Report Form, sample testing reports, and/or reviewed opinions on standard verification.

5.2 The provisions shall be implemented in accordance with “(I) Domestically Manufactured Pharmaceuticals” under “5. Dispatch of Reports.”

(III) Sampling

1. For domestically manufactured pharmaceuticals, sampling shall be conducted by the provincial drug regulatory authority at the place where the applicant or manufacturing enterprise is located (or an entity authorized thereby). For overseas manufactured pharmaceuticals, sampling shall be conducted by the applicant. For cause-based sampling and testing, sampling shall be conducted by the Food and Drug Inspection Center or the provincial drug regulatory authority.

2. Sampling shall comply with the relevant requirements of the *Measures for the Administration of Drug Quality Sampling and Testing*, the *Principles and Procedures for Drug Sampling*, and the *Procedures for Attribute Sampling Inspection*. Sampling seals shall bear the signature of the sampler and the official seal of the sampling entity.

3. Samples required for pharmaceutical registration testing shall consist of three batches produced at commercial scale. The quantity per batch shall be two times the amount required for full testing under the quality standards (where only partial items are subject to verification, the quantity per batch shall be two times the amount required for the relevant test items). Of such quantity, one portion shall be used for initial testing, 0.5 portion for re-testing, and 0.5 portion for re-examination in case of dispute.

The amount required for full testing generally refers to the total minimum number of packages required when each test item is conducted separately. The remaining shelf life of samples shall, in principle, be not less than two times the time limit for pharmaceutical registration testing. Under special circumstances, the applicant may consult with the relevant drug testing institution. Where both sample testing and standard verification are conducted simultaneously, the remaining shelf life shall be not less than 180 working days; where only sample testing is conducted, it shall be not less than 120 working days.

4. For rare disease pharmaceuticals, the samples required for registration testing may consist of one batch produced at commercial scale, with the quantity per batch being two times the amount required for full testing under the quality standards, unless otherwise specified for particular products.

For chemical drugs, the corresponding active pharmaceutical ingredient shall be sampled concurrently, as required for formulation review. For biological products, the corresponding bulk substance shall be sampled concurrently, as required for formulation review. The number of batches, quantity per batch, and remaining shelf life for chemical active pharmaceutical ingredients and bulk substances of biological products shall, in principle, be determined with reference to the relevant provisions applicable to formulations.

(IV) Special Circumstances

1. For registration testing applications concerning products subject to priority review and approval, drug testing institutions shall establish and implement procedures for priority testing or, in accordance with the requirements of the National Medical Products Administration (NMPA), give priority in the allocation of testing resources, and prioritize and expedite the conduct and completion of registration testing.

2. Where registration testing cannot proceed due to the applicant's need to supplement testing-related materials or provide special experimental materials, the drug testing institution shall, after communication with the applicant, suspend the registration testing and, within two working days, issue a "Notice for Supplementary Materials for Pharmaceutical Registration Testing" to the applicant. Registration testing shall be resumed upon completion of the required supplementation.



3. In principle, drug testing institutions shall not accept applications initiated by the applicant to withdraw registration testing (including pre-registration testing). Where the applicant applies to withdraw the registration application and the Center for Drug Evaluation (CDE) agrees to terminate the registration procedure, the CDE shall notify the relevant drug testing institution via the “data sharing platform” or other appropriate means, and the drug testing institution shall terminate the registration testing.

Upon receipt of the “Notice of Termination of Pharmaceutical Registration Application,” the applicant shall, within ten working days, apply to the relevant drug testing institution for the procedures to terminate registration testing and retrieve the registration testing materials and remaining samples. Failure to do so within the prescribed time limit shall be deemed as consent to the disposal of such materials and samples by the drug testing institution.

4. Where the applicant raises objections to the registration testing report, such objections may be submitted to the drug testing institution within seven working days from receipt of the report. The drug testing institution shall, within twenty working days, organize experts to review and assess the objections and issue a conclusion. Where necessary, testing of retained samples may be conducted, and the time required for such testing shall not be included in the aforementioned twenty working days.

(V) Information Communication with the Center for Drug Evaluation and the Applicant

1. The NIFDC and the Center for Drug Evaluation (CDE) shall exchange information through the “data sharing platform,” while provincial drug testing institutions and the CDE shall conduct information exchange through appropriate means. In accordance with the *Working Procedures for Initiating Drug Registration Inspection and Testing (Trial)* and the relevant provisions of these guidelines, they shall jointly study and address special circumstances arising in pharmaceutical registration testing.

2. The NIFDC shall, through the “data sharing platform,” and provincial drug testing institutions shall, through appropriate means, promptly provide feedback to the CDE on matters such as the acceptance of registration testing and the dispatch of reports.

3. At various stages, including prior to the application for registration testing, prior to the commencement of registration testing, and during the course of registration testing, drug testing institutions and applicants may communicate as necessary for the purposes of their work. Drug testing institutions shall establish procedures for such communication, specifying requirements and time limits.

(VI) Time Limits

1. The time limit for document review shall be five working days. The review of samples, reference standards, and special experimental materials for registration testing shall be

completed upon delivery of the samples. The time limit for sample testing shall be sixty working days, and for sample testing combined with standard verification shall be ninety working days.

For products included in priority review and approval, the time limit for sample testing shall be fifty working days, and for sample testing combined with standard verification shall be eighty working days.

For rare disease drugs that are urgently needed for clinical use, already marketed overseas but not yet marketed domestically, applicants are encouraged to apply for registration testing through pre-registration testing. In such cases, the time limit for sample testing shall be forty working days, and for sample testing combined with standard verification shall be seventy working days.

Where registration testing involves in vivo or in vitro activity tests, sterility tests, or microbiological examinations, the original testing time limits shall remain unchanged.

For registration testing conducted during the review stage, drug testing institutions shall prioritize the allocation of testing resources and expedite the conduct and completion of registration testing. The time limit for supplementation of materials during registration testing shall be thirty working days.

2. The commencement date for calculating the time limit for registration testing shall be the date on which the drug testing institution completes the receipt and review and issues the "Notice of Acceptance for Pharmaceutical Registration Testing." The end date shall be the date on which the drug testing institution issues the final pharmaceutical registration testing report.

During the course of registration testing, the time consumed by the applicant in supplementing testing-related materials and special experimental materials, as well as time spent in communication with the drug testing institution, shall not be included in the time limit for registration testing. The time required for investigation and evidence collection, as well as time spent in agreeing on testing plans with the Center for Drug Evaluation in cause-based sampling and testing, shall also not be included. The time required for handling objections raised by the applicant, expert review, and testing of retained samples shall likewise not be included.

3. Where it is necessary to extend the testing time limit due to product-specific characteristics or special circumstances arising during testing, the drug testing institution may, upon approval by the relevant responsible person, notify the applicant and the Center for Drug Evaluation. For pre-registration testing, only the applicant shall be notified. Any extension shall not exceed one-half of the original time limit.

VII. Basic Technical Requirements for Pharmaceutical Registration Testing

(I) Document Review

Drug testing institutions shall, in accordance with the requirements for pre-registration testing and those of the Center for Drug Evaluation (CDE), review the pharmaceutical research materials

related to the quality standards of the drug under application. Such review shall include, but not be limited to: the drug quality standards and their drafting, method validation data (including validation data for sterility and microbiological limit tests), product testing reports, manufacturing processes, quality control, stability studies, and reference standards. Based on the review, the testing items, testing methods, and key points for standard verification for method confirmation and/or transfer shall be determined.

For microbiological testing (including sterility and microbiological limit tests), the testing items, standard settings, and testing quantities shall, in principle, be no less stringent than the requirements set out in the *Chinese Pharmacopoeia* or harmonized methods under ICH. Microbiological testing shall be supported by method suitability testing data, which shall be consistent with the method descriptions in the quality standards. The test strains used in method suitability testing shall be consistent with those specified in the pharmacopoeial requirements on which the quality standards are based.

(II) Sample Testing and Standard Verification

1. Sample Testing

Drug testing institutions shall conduct laboratory testing on the received samples in accordance with the drug quality standards submitted by the applicant and the requirements of the quality management system of the drug testing institution, and shall issue a sample testing report.

2. Standard Verification

Drug testing institutions shall, with reference to the *Chinese Pharmacopoeia* and other domestic quality standards for similar products, as well as relevant technical requirements and guidelines issued by international organizations such as WHO and ICH, and with consideration of foreign pharmacopoeial standards, evaluate the scientific validity and reasonableness of the testing items and their standard settings, as well as the applicability and feasibility of the testing methods in the drug quality standards submitted by the applicant. Such evaluation shall include, but not be limited to, the following aspects.

2.1 Quantitative Analytical Methods

For assay methods of active pharmaceutical ingredients, the system suitability, accuracy, precision, and specificity of the method shall be confirmed. For impurity analytical methods, the system suitability, limit of quantitation, accuracy, precision, and specificity shall be confirmed.

2.2 Limit Testing Methods

It shall be clarified whether the impurity limits are reasonable. Residual solvents shall, in principle, be controlled in accordance with the *Chinese Pharmacopoeia*. For impurity analytical methods, the limit of detection shall be confirmed; for purity analytical methods, specificity and precision shall be confirmed; for impurity analytical methods applying correction factors, the accuracy of such correction factors shall be confirmed. For other limit testing methods, specificity and limit of detection shall be confirmed.



2.3 Qualitative Analytical Methods

Specificity shall be confirmed.

2.4 Requirements for Drafting Standard Verification Opinions

See Annex 2.

(III) Reference Standards for Registration Testing

Reference standards used for registration testing include national pharmaceutical reference standards and non-national pharmaceutical reference standards. National pharmaceutical reference standards refer to those developed, calibrated, and supplied by the NIFDC in accordance with law.

1. When applying for pharmaceutical registration testing, the applicant shall declare the source of reference standards used in the development of the quality standards. Where available and applicable national reference standards exist, the drug testing institution shall use national pharmaceutical reference standards for registration testing. Where non-national reference standards are used, the applicant shall, at the time of applying for registration testing, provide the relevant reference standards and supporting research data. The quantity of such reference standards provided shall be sufficient to meet testing requirements.

2. Where non-national reference standards are used for quality studies, the applicant shall, prior to approval of the marketing authorization application, file with the NIFDC the source materials and relevant research data of such reference standards. Where other national official reference standards are used, in principle, the applicant shall file information on the source materials of reference standards of the same name and submit the relevant information.

