

Preparing eCTD Compliant PDF Documents

A. Purpose

To speed up submission timelines and facilitate the FDA’s review of a submission, PDF documents must follow the specifications in the FDA’s [Technical Specifications Document for PDF](#).

Creating a PDF document for eCTD submission should begin with a properly formatted Word document, then convert to PDF. Formatting Tools and Guidance for formatting Word documents can be found [here](#). The steps below should be followed to ensure that the PDF documents are ready to be submitted to the FDA while complying with FDA’s requirement. Each document will be checked for compliance by the TRI-DMID Regulatory Team before submission to the FDA.

NOTE: No security, password, *etc.* should be applied to a document; if the PDF document is locked to editing, the TRI-DMID Regulatory Team may need to request an unlocked version, resulting in submission delays.

B. Steps for Meeting Requirements for eCTD PDF Format:

(May vary depending on your version of Adobe.)

1. Text Editing

All text must be editable.

- a. Click through the document, make sure text can be highlighted and is searchable.
- b. If not, optimize optical character recognition (OCR).

Edit → Edit Text & Images

2. Check/Add Page Numbers

Page numbers are needed for each document and should show consistent numbering throughout the document.

Tools → Edit PDF → Header & Footer → Add → Insert Page Number

3. Check/Add Bookmarks

Functioning bookmarks are needed for navigation if a document is 5 pages or more. The bookmarks should match the major headings of the document.

- a. Select text and click “Ctrl+B” to create a bookmark.
- b. Set the hierarchy to match the hierarchy or headings in the document by clicking and dragging the bookmark to appropriate level.
- c. Check destination of each existing bookmark.
- d. If incorrect, navigate to the page of the bookmark and right click on the bookmark, then select “Set destination”.
- e. Set bookmarks to “inherit zoom” by right-clicking on the bookmark, then:
Properties → Actions → Edit → Options → Zoom: Inherit Zoom

4. Table of Contents (TOC), List of Tables (LOT), List of Figures (LOF)

A TOC should be present at the beginning of the document if the document is 5 pages or longer. Separate LOT and LOF are needed if there are tables and figures in the document. This allows for ease of navigation. This is best done on the original word document. This requirement does not apply to controlled documents like SOPs that normally do not include a TOC, however, the document should be bookmarked.

Test by clicking on entries in the TOC, LOT, LOF to ensure function and accuracy.

5. Check/Insert Cross-references/Hypertext links

Cross-references are needed to link to referenced tables, figures, or sections.

a. Check destinations of existing cross-references.

b. Create Link:

Edit → Edit Texts and Images → Highlight and Right Click on Text Requiring Cross-Referencing → Create Link → Edit Link Appearance (Invisible Rectangle, Blue) → Next → Create Go to View → Use the scrollbars, mouse, and zoom tools to select the target view, then press Set Link to create the link destination

c. Hyperlink colors should be set to Blue = 255

6. Remove active web URLs

Active web URLs are not compliant and should be deactivated.

Edit → Edit Text and Images → Link → Remove Web Links

7. Document Properties

Properties in the PDF documents must be set as noted below.

a. Ctrl+D to open Document Properties window

i. Description: PDF Version of 1.4 or higher

ii. Security: No Security

iii. Fonts: All embedded

To embed: Tools → Optimize PDF → Preflight → Select Tool Icon → Document → Embed Missing Fonts → Save

iv. Initial View: Navigation Tab: Page Only or Bookmarks Panel & Page (if bookmarks are present), Page Layout: Default, Magnification: Default, Open to page: 1

v. Fast Web View: Yes

Edit → Preferences → Documents → Check “Save As optimized for Fast Web View”

C. Impact of Non-compliant PDFs

The FDA has established validation criteria and error codes to alert submitters of issues with documents that impede their review. [Table 1](#) below shows some of the error codes that are generated by the FDA validation criteria and the method for resolving the issue in the document. Our goal is to have error-free documents and submissions.

Table 1: FDA Error Codes Associated with Non-compliant PDFs

NUMBER	PROBLEM	RESOLUTION
5005	<p>You have used a non-standard font and failed to fully embed the font.</p> <ul style="list-style-type: none"> - Hint: Fonts must be embedded 	Please see section: Fonts: All embedded
5040	<p>Fast Web Access option not found</p> <ul style="list-style-type: none"> - Hint: PDFs must have Fast Web Access active 	Please see section: Fast Web View
5045	<p>PDF does not open in the FDA desired view</p> <ul style="list-style-type: none"> - Hint: The initial view of the PDF files should be set as 'bookmarks and pages' in the navigation panel. If there are no bookmarks, the initial view should be set to 'pages only'. PDF files should open with 'default' zoom. 	Please see section: Initial View: Page Only or Bookmarks Panel & Page (if bookmarks are present), Default, Default
5205	<p>A document with references to one or more external hyperlinks (e.g. web links, email links) has been submitted</p> <ul style="list-style-type: none"> - Hint: Ensure that documents do not have hyperlinks that are external to the application 	Please see section: Remove active web URLs
1238	<p>File size exceeds maximum limit (100 MB) per eCTD specification</p>	Generally avoid sending files with sizes that exceed the eCTD Specification.
5035	<p>File does not have PDF version 1.4, 1.5, 1.6, or 1.7 or higher</p> <ul style="list-style-type: none"> - Hint: PDF version is not consistent FDA guidance 	Please see section: Description: PDF Version of 1.4 or higher