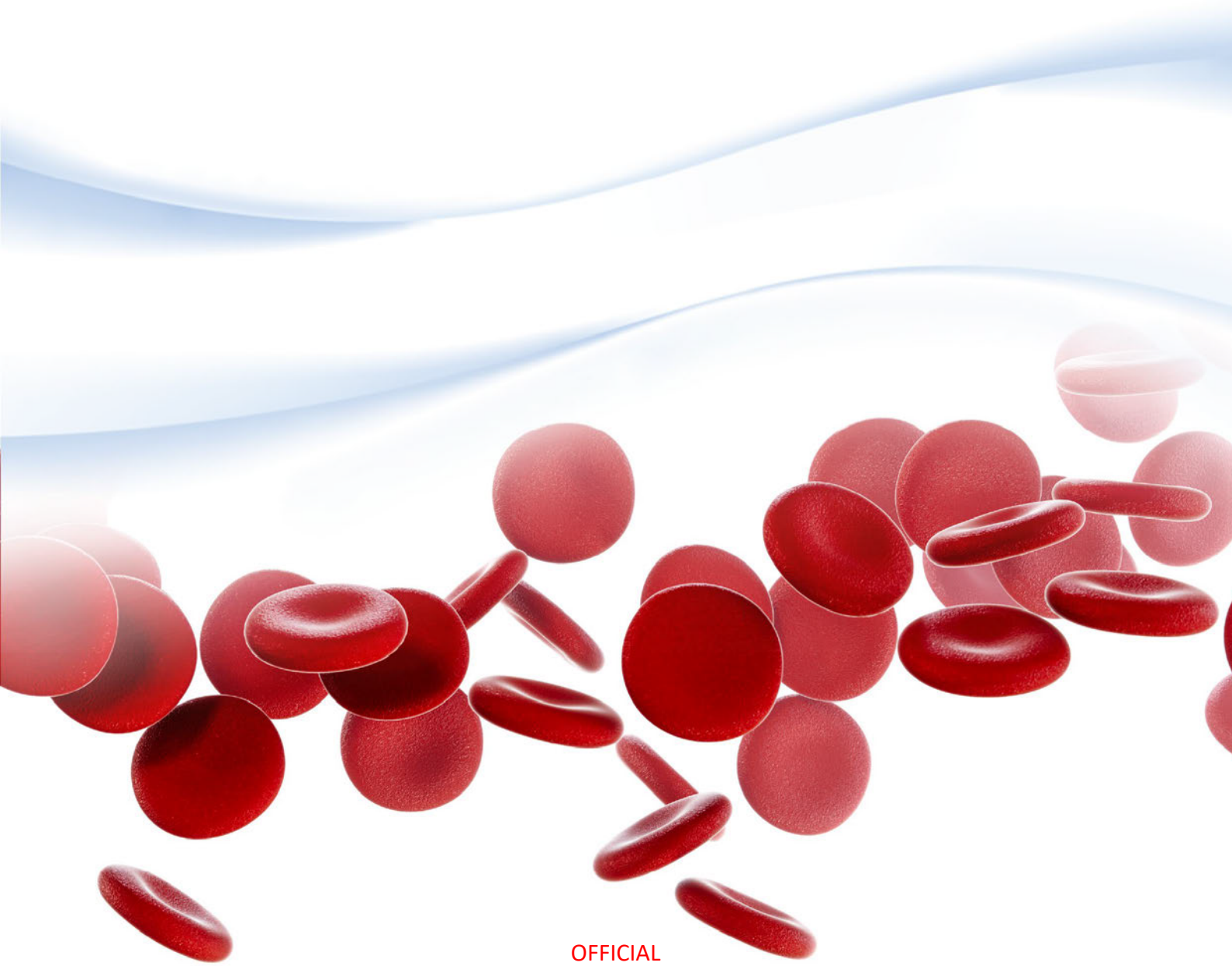
Australian Government
Department of Health, Disability and Ageing
Therapeutic Goods Administration

Proposal: Provisions to Regularise the Technical Master File (TMFs) and Type II Plasma Master File (PMFs) Processes

Consultation Paper

Version 1.0, October 2025



Confidentiality
All submissions received will be placed on the TGA's Internet site, unless marked confidential. Any confidential material contained within your submission should be provided under a separate cover and clearly marked "IN CONFIDENCE." Reasons for a claim to confidentiality must be included in the space provided on the TGA submission form. For submission made by individuals, all personal details, other than your name, will be removed from your submission before it is published on the TGA's Internet site. In addition, a list of parties making submissions will be published. If you do not wish to be identified with your submission you must specifically request this in the space provided on the submission form.

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Overview

The Therapeutic Goods Administration (TGA) is seeking industry feedback on proposed amendments to strengthen the legislative framework for Technical Master Files (TMFs) for blood and blood components, and Plasma Master Files (PMFs) for Type II plasma-derived products.

The proposed changes aim to clarify regulatory requirements, reinforce existing practices, and ensure the legislation reflects the original policy intent. Your input is essential to help ensure the proposed changes are practical, effective, and aligned with industry needs.

Providing feedback

How you can share your feedback

We are seeking your views on the proposals in this consultation paper to ensure the changes proposed to the legislation are fit for purpose. Several questions have been posed throughout this paper, and we ask that you respond to all questions relevant to you and/or your organisation.

Written submissions are requested on or before **11 November 2025** using the Citizen Space portal.

Any questions relating to the submission process can be directed to TGA.Scientific@health.gov.au.

Scope

This consultation seeks feedback on proposed amendments to the legislation relating to the evaluation of **Technical Master Files (TMFs)** and **Type II Plasma Master Files (PMFs)**.

The consultation paper covers the following areas:

- Part 1: Background
- Part 2: Proposed amendments
- Part 3: Next steps.

The following topics are **not** within scope of this consultation:

- Type 1 PMFs
- Broader regulatory reforms beyond the current TMF and PMF processes.

Why we are consulting

Since approximately 2001, the TGA has required manufacturers of blood and blood components, and those involved in the fractionation and export of imported plasma, to prepare and submit TMFs and PMFs for evaluation on both an initial and annual basis:

- **Technical Master Files (TMFs)**: submitted by manufacturers of blood and blood components that demonstrates compliance with standards and report any manufacturing changes.

- **Type 2 Plasma Master Files (PMFs)**: submitted by the GMP licence holder for imported plasma used in fractionation (not supplied in Australia) to ensure it does not pose a contamination risk to Australian plasma products.

The TGA has reviewed the existing legislative framework and has come to the view that the therapeutic goods legislation either does not, or does not clearly, require the submission of initial and annual updates for TMFs and Type II PMFs, or the collection of fees for the evaluation of TMFs and Type II PMFs (refer to Attachment 1). The proposed changes will regularise existing evaluation processes for TMFs and Type II PMFs, including in relation to the collection of a fee for those evaluations. These changes will:

- regularise existing processes for TMFs and Type II PMFs (aligned with the original policy intent).
- enhance regulatory clarity.
- provide a clear basis to support the fees collected.

Part 1: Background

Existing regulatory framework for blood and blood components

Blood, blood components, and haematopoietic cells (HPCs) are regulated as medicines under Part 3-2 of the Therapeutic Goods Act 1989 (the *Act*). Blood and blood components are exempt from registration under Schedule 5 Item 10 of the Therapeutic Goods Regulations 1990 (the *Regulations*) where they are manufactured by the holder of a licence under Part 3-3 of the Act.

All licenced manufacturers are required to follow the applicable manufacturing principles set out in the Therapeutic Goods Manufacturing Principles 2020 (*the Determination*) unless otherwise specified in the licence.[1]

Part 2 of Schedule 1 to the Determination requires that blood, blood components, and HPCs must be manufactured in compliance with the Australian Code of Good Manufacturing Practice for human blood and blood components, human tissues and human cellular therapy products 2013. A manufacturer of blood, blood components, and HPCs must also submit a Technical Master File (TMF) with an application for a licence and follow the manufacturing process described in individual TMF lodged for the product (Part 2 of Schedule 1 of the *Determination*).

Plasma for transfusion[2] is a blood component and is regulated under the same framework as other blood components, including TMFs.

[1] Federal Register of Legislation - Therapeutic Goods (Manufacturing Principles) Determination 2020

[2] See the paragraph (d) of the definition for 'blood components' in s 4 of the Determination.

Technical Master Files (TMFs)

TMFs are critical documents that ensure the quality, safety, and efficacy of the products derived from human blood. These documents are considered essential for verifying the ongoing safety, quality, and efficacy of these high-risk biological products and to ensure the product remains compliant with current regulatory requirements. TMF submissions include:

- a compilation of technical information on the collection, testing, processing, storage, and distribution of blood and blood components that is consistent with the Guideline for the Preparation of Technical Master Files for Blood, Blood Components and Haematopoietic Progenitor Cells (Third Edition, 2008).
- sufficient information that demonstrates blood, blood components or haematopoietic progenitor cells will be manufactured in compliance with relevant standards, being:
    - for blood or blood components, the Therapeutic Goods Order 2019 (Standard for Blood and Blood Components) (TGO 102[3]); or
    - for haematopoietic progenitor cells derived from cord blood, the Therapeutic Goods Order No. 94 (Standard for Hematopoietic Progenitor Cells derived from Cord Blood) (TGO 94[4]).
    - For blood, blood components, or HPCs, the *Therapeutic Goods (Standard for Human Cell and Tissue Products—Donor Screening Requirements) (TGO 108) Order 2021*.

The TGA has previously collected fees for:

- initial TMF evaluation: submitted with a manufacturing licence application. If the TMF was not approved, a re-evaluation fee applied.
- annual TMF updates: applied to annual submissions received from licensed manufacturers. These updates reflected approved changes made to the manufacturing process during the year.

Existing regulatory framework for plasma for fractionation

Plasma for fractionation is a raw material used to manufacture plasma-derived products (e.g. clotting factors, immunoglobulins) and is not considered a blood component.

Plasma for fractionation must be manufactured under a manufacturing licence under Part 3-3 of the *Act*. All manufacturers subject to Part 3-3 are (except as otherwise specified in the licence) subject to conditions on their licence requiring them to follow the applicable manufacturing principles defined in *the Determination*. Plasma-derived products are regulated as Prescription Medicines under the *Act* and are not exempt from registration.

Plasma Master Files (Type II PMFs)

There are two types of PMFs which support the quality of product-specific plasma derived products:

- Type I PMFs describe the quality of plasma for fractionation used in the manufacture of blood products and plasma derivatives used in products supplied in Australia.

[3] Therapeutic Goods (Standard for Blood and Blood Components) (TGO 102) Order 2019

[4] Therapeutic Goods order No. 94 (Standard for Haematopoietic Progenitor Cells derived from Cord blood) 2017

- Type II PMFs are submitted to ensure the quality of plasma for fractionation being imported, fractionated in Australia, and then exported (not supplied domestically).

The proposed changes in this consultation are limited to the regulatory framework that underpin imported plasma for fractionation which is fractionated in Australia and then exported (Type II PMFs). They do not affect Type I PMFs or the PMF process itself, and as such, this paper will only address imported plasma for fractionation which is fractionated in Australia and then exported.

A Type II PMF is a stand-alone-document that records the quality aspects of human plasma used as a raw material for the manufacture of therapeutic derivatives, including clotting factors, immunoglobulins and albumin. Type II PMFs are submitted to ensure the quality of the plasma for fractionation being imported, fractionated in Australia and then exported (i.e., not for supply in Australia). This practice is to ensure the imported plasma is of acceptable quality and will not cross-contaminate Australian plasma derivatives that are fractionated in the same facility with transmissible diseases such as HIV, HBV, and HCV.

A Type II PMF is required for each source that the plasma is being imported from as outlined in the Determination and aligned to the PMF Guideline - *Guideline on the Scientific Data Requirements for a Plasma Master File (PMF) Revision 1 (2006)*[5] published by the European Medicines Agency (EMA). A Type II PMF submission includes:

- source of the plasma.
- location(s) of where the plasma was collected.
- screening process for donors.
- tests that were used to screen blood and plasma.
- results of these testing procedures (epidemiology data).

Type II PMFs must also comply with specific standards including:

- Therapeutic Goods (Standards for Human Cell and Tissue Products – Donor Screening Requirements) (TGO 108) Order 2021[6].

The TGA previously collected fees for:

- Initial evaluation fees – collected when a Type II PMF was submitted by the licence holder. If the PMF was not approved, a re-evaluation fee applied.
- Annual update fees – applied to Type II PMFs only when submitted by the licence holder.
    - These annual updates reflect approved changes to the manufacturing process made during the year and provide a level of regulatory oversight to ensure ongoing product safety and quality.

[5] Guideline on the Scientific Data Requirements for a Plasma Master File (PMF) Revision 1

[6] Therapeutic Goods (Standard for Human Cell and Tissue Products - Donor Screening Requirements) (TGO 108) Order 2021

Part 2: Proposed changes

A. Changes to the regulation of Technical Master Files

Table 1, below, summarises the current process for the evaluation of TMFs, issues identified by the TGA, and the proposed changes. Currently, we are not consulting on more substantive changes to the TMF regulatory framework.

Table 1: TMF current process, issues identified by the TGA, and proposed changes.

Process	Current Process	Identified Issues	Proposed Changes
Initial Submission	*Provisions are outlined in the Determination.* A manufacturer of blood or blood components must lodge a Technical Master File (TMF) with an application for a licence and follow the manufacturing process described in the individual TMF submitted for the product.	The TGA has determined that the requirement to submit an initial TMF is potentially beyond the scope of what can be included in the Determination.	*Move the exemption from registration from Schedule 5 to Schedule 5A of the Regulations and add specific conditions.* By formally transferring the provisions from Schedule 5 to Schedule 5A, specific conditions would be introduced that regularise existing processes. Sponsors would need to ensure conditions are complied with. An outline of what these conditions could look like is in Attachment 2. Partial redrafting of the Determination would be required to delete references to blood, blood components, HPCs, and TMFs, as outlined in Attachment 2.
Annual updates	*Outlined in the Guideline for the Preparation of Technical Master Files for Blood, Blood Components and HPCs.* Annual updates are required to reflect TGA approved variations to the TMF.	The TGA has determined that there is no legislative requirement for annual TMF updates.	*Move the exemption from registration from Schedule 5 to Schedule 5A of the Regulations and add specific conditions.* By formally transferring the provisions from Schedule 5 to Schedule 5A, specific conditions would be introduced that regularise existing processes.

Process	Current Process	Identified Issues	Proposed Changes
			Sponsors would need to ensure conditions are complied with. An outline of what these conditions could look like is in Attachment 2. Partial redrafting of the *Determination* would be required to delete references, to blood, blood components, HPCs, and TMFs, as outlined in Attachment 2.
Cost Recovery Fees	*Fee was collected pursuant to Item 9AD, Schedule 9 of the Regulations.* For the evaluation of both initial and the annual update an evaluation fee is collected (based on the number of pages).	The TGA has determined that Item 9AD does not apply in relation to initial and annual evaluations.	*Insert a new prescribed fee into Schedule 9 of the Regulations.* The fee would be linked to the conditions outlined in the proposed Schedule 5A exemption.

In addition, the 'Guideline' for the preparation of TMFs for blood, blood components, and HPCs would be updated to capture any proposed changes. This guidance provides support to manufacturers and sponsors in compiling TMFs and ensuring compliance with the regulatory framework for TMF processes.

Expected impact

Low stakeholder impact would be expected as the evaluation process and fee structure would remain mostly unchanged. It would be the sponsor's responsibility to ensure conditions of the exemption are complied with.

The proposed changes would have the effect of regularising the requirement to submit annual TMF updates, and the collection of a fee for the evaluation of those documents.

Questions

Stakeholders are encouraged to review the proposed changes and provide feedback on the following questions:

1. Do you support the proposed changes relating to TMFs, to move the registration exemption to Schedule 5A with conditions that regularise TMF evaluations, including in relation to the collection of a fee for those evaluations?

2. What impact, if any, do you expect the proposed amendments to have on manufacturers of blood and blood component products?

3. Do the consequential changes to the Manufacturing Principles (the Determination) raise any concern?

4. Do you have any additional feedback or suggestions regarding the proposed changes, or the TMF regulatory framework more broadly?

B. Changes to the evaluation of Type II Plasma Master Files

Table 2, below, summarises the current process for the evaluation of Type II PMFs, issues identified by the TGA, and the proposed changes. Currently, we are not consulting on more substantive changes to the Type II PMF regulatory framework.

Table 2: Type II PMF current process, issues identified by the TGA, and proposed changes.

Process	Current Process	Identified Issues	Proposed Changes
Initial Submission	*Provisions are outlined in the Determination.* Manufactures of imported plasma for fractionation and subsequent exportation are required to provide Type II PMFs, prepared in accordance with the *PMF Guideline*[7] to satisfy the TGA that the plasma would not contaminate Australian plasma.	The TGA has determined that the requirement to submit an initial Type II PMF is potentially beyond the scope of what can be included in the Determination.	*Move the registration exemption from Schedule 5 to Schedule 5A of the Regulations and add specific conditions.* Provisions would be removed from Schedule 5. A new exemption would be inserted into Schedule 5A with specific conditions to regularise existing processes. Sponsors would need to ensure conditions are complied with. An outline of these conditions is in Attachment 3. The Determination will be amended to remove references to plasma and PMFs, as outlined in Attachment 3.
Annual updates	Manufacturers are required to submit Type II PMF annual updates,	The TGA has determined that there is no legislative	*Move the registration exemption from Schedule 5 to Schedule 5A of the Regulations and add specific conditions.*

[7] Guideline on the Scientific Data Requirements for a Plasma Master File (PMF) Revision 1 (2006) (EMEA/CHMP/BWP/3794/03 Rev. 1)

Process	Current Process	Identified Issues	Proposed Changes
	incorporating any variations submitted during the year.	requirement for annual TMF updates.	By formally transferring the provisions from Schedule 5 to Schedule 5A, specific conditions would be introduced that regularise existing processes. Sponsors would need to ensure conditions are complied with. An outline of these conditions is in Attachment 3. Partial redrafting of the *Determination* would be required to delete references to plasma and PMFs, as outlined in Attachment 3.
Cost Recovery Fees	*Fee was collected pursuant to Item 9AD, Schedule 9 of the Regulations.* For the evaluation of the annual update, an evaluation fee was collected (based on the number of pages).	The TGA has determined that Item 9AD does not apply in relation to initial and annual evaluations.	*Insert a new prescribed fee into Schedule 9 of the Regulations.* The fee would be linked to the conditions outlined in the new Schedule 5A exemption.

Expected impact

Low stakeholder impact is expected as the evaluation process and fee structure will remain mostly unchanged. It would be the sponsor's responsibility to ensure conditions of the exemption are complied with.

The proposed changes would have the effect of regularising the requirement to submit annual Type II PMF updates and the collection of a fee for the evaluation of those documents.

Questions

Stakeholders are encouraged to review the proposed amendments and provide feedback on the following questions to help refine the Type II PMF regulatory framework:

1. Do you support the proposed changes and minor technical updates to the provisions relating to Type II PMFs?

2. What impact, if any, do you expect the proposed amendments would have on manufacturers and sponsors of imported plasma for fractionation and export (Type II PMFs)?

3. Do the proposed changes to the Therapeutic Goods Manufacturing Principles 2020 (the Determination) raise any concerns?

4. Do you have any additional feedback or suggestions regarding the proposed changes, or the Type II PMFs regulatory framework more broadly?

Part 3: Next Steps

We want to hear from you

Your feedback will help the TGA understand how these proposed changes are perceived. While the proposed amendments are not expected to significantly alter current administrative processes, including in relation to the collection of fees, your input will help identify any critical issues that may need to be addressed in future reforms. Submissions are invited from:

- Stakeholders including sponsors, manufacturers, healthcare professionals, and other interested parties of blood, blood components, and plasma products.

You may choose to remain anonymous. If you provide personal information, it will be managed in accordance with the *Privacy Act 1988* and the *Australian Privacy Principles*. For more details, see the privacy collection notice below.

We may contact you for further input based on your submission. If you prefer not to be contacted, please let us know in your response.

How to provide feedback

Feedback can be provided using the online submission form at Citizen Space. Please ensure your submission clearly addresses any concerns, suggestions, or support for the proposed changes. If you have any questions about the submissions or the process, please email TGA.Scientific@health.gov.au.

Submissions are due by 5pm on 11 November 2025.

What we will do with your feedback

Written submissions will help the TGA assess the proposed changes outlined in this consultation paper. Your input is essential to building a comprehensive understanding of the potential impacts of these proposed changes. We will carefully assess any regulatory burden in relation to the expected benefits.

After reviewing all feedback, the TGA will advise the Government on updates to the legislation to support the proposed amendments.

Following the consultation period, the TGA will:

1. Consider all submissions received.
2. Publish a summary of responses and the outcome on the TGA website.
3. Finalise drafting of amendments.
4. Seek approval for legislative changes.
5. Communicate implementation timelines and transitional arrangements.

We appreciate your contribution and look forward to your insights.

Privacy Collection Notice

The TGA is bound by the *Australian Privacy Principles (APPs)* under the *Privacy Act 1988.* These principles govern how we collect, use, store, and disclose personal information, and how individuals may access, or correct personal information held about them.

Providing personal information in your submission is voluntary. Please avoid including personal information about third parties.

Unless you request anonymity or confidentiality, the TGA may publish your submission—including your name—on its website. If you do not request anonymity or confidentiality, you acknowledge that:

- Your submission may be accessible to individuals outside Australia.
- Overseas recipients of your personal information may not be subject to the *Privacy Act 1988*.
- You may not be able to seek redress under the *Privacy Act* if an overseas recipient mishandles your personal information.

The TGA may redact parts of submissions before publication to remove defamatory, sensitive, or inappropriate content. Submissions containing offensive language or inappropriate material may not be published or responded to and may be destroyed.

Information provided in submissions, including personal information, may be shared with:

- The Commonwealth Government.
- State and territory governments, departments, and agencies.
- Other third parties, where relevant to the consultation process.

For further information about how we handle personal information, please refer to the Department of Health, Disability and Ageing Privacy Policy.

Consultation period

Stakeholders are encouraged to provide feedback on the proposed amendments to the regulatory framework. Table 3 outlines the key dates relevant to the consultation process.

Table 3: Key Consultation Dates

Action	Date
Consultation paper published and consultation commences	14 October 2025

Action	Date
Consultation closes	11 November 2025
Response published	Late December 2025

Version history

Version	Description of change	Author	Effective date
V1.0	Original publication	Scientific Operations Management Section, Scientific Evaluation Branch, Medicines Regulation Division	01/10/2025

Attachment 1: Summary of issues

The TGA has identified the following issues in relation to the evaluation of Type II PMFs and TMFs:

TMFs

- The requirement in the Therapeutic Goods (Manufacturing Principles) Determination to lodge an initial TMF is potentially beyond the scope of what can be included in the Determination.
- There is no basis for requiring manufacturers to submit annual updates to TMFs.
- There is no fee item that can be relied on to collect a fee for the initial or annual evaluation of TMFs (outside of limited circumstances).

Type II PMFs

- The requirement in the Determination to lodge an initial Type II PMF may be beyond the scope of what can be included in the Determination.
- There is no basis for requiring the submission of annual updates to Type II PMFs.
- There is no fee item enabling the TGA to collect money for evaluating updates to Type II PMFs (outside of limited circumstances).

Attachment 2: Draft changes for TMFs

Outline of proposed changes to the Regulations

The following proposed changes would have the effect of regularising the requirement to submit an initial TMF or PMF, submit annual updates to TMFs and PMFs, and enable the collection of an evaluation fee.

- Transfer the registration exemption for blood, blood components, and HPCs from Schedule 5 to Schedule 5A to the Regulations.

- Make the exemption subject to the following conditions:
    - The manufacturer must hold a manufacturing licence to manufacture blood and blood components.
    - The sponsor submits a TMF for evaluation by the TGA:
        - before the manufacture of the blood or blood components commences; and
        - annually.
    - The sponsor of the product receives TGA approval in respect of that evaluation. The sponsor pays a fee for the evaluation.
    - The TMF complies with certain prescribed applicable standards (and guidelines).
- Insert corresponding fees into Schedule 9 of the Regulations.

Minor technical updates

To ensure consistency and alignment between the proposed Regulation changes and the Therapeutic Goods (Manufacturing Principles) Determination 2020, the following minor updates would be required:

- Remove current TMF references in the Therapeutic Goods (Manufacturing Principles) Determination 2020 to reflect the proposed revised exemption framework.

- Update the TGA website and associated guidance documents to enhance clarity and ensure that all stakeholders clearly understand the proposed changes.

Attachment 3: Draft changes for Type II PMFs

Outline of proposed changes to the Regulations

The following proposed amendments would have the effect of regularising the requirement to submit an initial Type II PMF and annual updates and enable the collection of an evaluation fee.

- Transfer the registration exemption for imported plasma for fractionation and export provisions relating to Type II PMFs from Schedule 5 to Schedule 5A of the Regulations.

- The revised provisions for Type II PMFs would include specific conditions designed to support the revised regulatory provisions:
    - The sponsor submits a Type II PMF for evaluation by the TGA:
        - Submitted and approved by the TGA prior to import; and
        - annually.
    - The sponsor receives TGA approval in respect of that evaluation.
    - The sponsor pays a fee for the evaluation.
    - The manufacturer must hold a manufacturing licence to manufacture plasma derived products.
    - The Type II PMF complies with certain prescribed applicable standards and guidelines.
    - Clarify that plasma used for fractionation, even if collected from outside Australia, and not intended for processing into products or use within Australia (Type II PMFs), is **not** exempt as a starting material under item 9 of Schedule 5 of the Regulations.

- Insert corresponding fees into Schedule 9 to the Regulations.

Minor technical updates

The following updates would be intended to ensure consistency and alignment between the proposed Regulations, the Therapeutic Goods (Manufacturing Principles) Determination 2020, and supporting guidance materials including:

- Removal of current Type II PMF references in the Manufacturing Principles Determination to reflect the proposed revised exemption and conditions.

- Update the TGA website and related guidance documents to ensure clarity and support stakeholder understanding of the proposed changes.

Therapeutic Goods Administration

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