ZAMBIA MEDICINES REGULATORY AUTHORITY



APPLICATION FOR MARKETING AUTHORISATION OF A MEDICINE FOR HUMAN USE

GUIDANCE ON SUBMISSION OF APPLICATIONS FOR AMENDMENT TO MARKETING AUTHORISATION IN COMMON TECHNICAL DOCUMENT FORMAT: QUALITY

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Introduction

The Zambian Amendment Guidelines were developed by the Zambia Medicines Regulatory Authority in order to provide guidance to Marketing Authorization Holders (MAHs) or finished pharmaceutical product (FPP) manufacturers on regulatory requirements in order to implement change(s) to a Marketing Authorization.

The Guidelines are based on the *Guidance on Submission of Applications for Marketing Authorisation in Common Technical Document Format: Quality* and have been adopted and adapted from the *WHO Guidelines on variations to prequalified products* (Technical Report Series, No. 981, 2013, Annex 3). In comparison with the WHO variations guidelines, there are a few differences in classification of changes – in particular, the minor amendments.

The Guidelines clarify the technical requirements that should be fulfilled by a Marketing Authorization Holder (MAH) or finished pharmaceutical product (FPP) manufacturer before they can implement any changes to a product that has been granted marketing authorization (MA).

The Guidelines broadly provides for two (2) main classifications of post-approval changes namely Major Amendment (MaA), requiring prior regulatory approval, and Minor Amendment (MiA). The latter is further reclassified into Notifications (N) and changes that require Prior regulatory approval (P). Thus, based on the level of inherent risk to each change, the amendments have been categorized as:

- Major Amendment (MaA-P)
- Minor Amendment Prior approval (MiA P)
- Minor Amendment Notification (MiA N)

The general requirements have been discussed as they relate to all the major sections of a quality dossier, in order to clarify the considerations necessary to assess the risk of each change, and to specify the documentation required to support the change.

The change categories are organized according to the structure of the common technical document (CTD). The specific CTD sections associated with individual data requirements have been identified in order to assist in the filing of documentation (reproduced with corresponding numbers in bold).

Changes are classified as major only in those instances where the level of risk is considered to be high and it is deemed necessary to provide the Authority with adequate time for an assessment of the supporting documentation. Particular circumstances are identified where lower reporting requirements (Minor Amendment - Notification [MiA – N]) are possible; and prior approval is required for all other amendments (Major Amendment [MaA-P] and Minor Amendment – Prior approval [MiA – P]). In all cases where regulatory approval is required prior to implementation, assessment timelines will be published in order to provide predictable and reasonable timeframes.

In addition, the guidelines assist in understanding the possible consequences of the listed changes, and may be useful as a risk management tool to promote or enhance best practices within organizations.

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3. Glossary

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- 2. Change in the name or address of a manufacturer of an API that is not a supplier of a prequalified API or that is not supported by a CEP
- 3. Change in the name and/or address of a manufacturer of the FPP
- 4. Deletion of a manufacturing site or manufacturer

5. Changes to a CEP or to a confirmation of API-pregualification document

- 5. Submission of a new or updated CEP for an API or starting material or intermediate used in the manufacturing process of the API
- 6. Submission of a new or updated confirmation of API-prequalification document
- 7. Submission of a new or updated transmissible spongiform encephalopathy (TSE) CEP for an excipient or API (addition or replacement)

6. Quality changes

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- 3.2. S.2 Manufacture

- 8. Replacement or addition of a new manufacturing site or manufacturer of an API
- 9. Change or addition of a manufacturing block or unit at a currently accepted site of API manufacture
- 10. Change in the manufacturing process of the API
- 11. Change in the in-process tests or limits applied during the manufacture of the API
- 12. Change in batch size of the API or intermediate
- 13. Change to the specifications or analytical procedures applied to materials used in the manufacture of the API (e.g. raw materials, starting materials, reaction intermediates, solvents, reagents, catalysts)

3.2. S.4 Control of the API by the API manufacturer

14. Changes to the test parameters, acceptance criteria, or analytical procedures of the API manufacturer that do not require a change to the FPP manufacturer's API specifications

3.2. S.4 Control of the API by the FPP manufacturer

- 15. Change to the test parameters or acceptance criteria of the API specifications of the FPP manufacturer
- 16. Change to the analytical procedures used to control the API by the FPP manufacturer

3.2. S.6 Container-closure system

- 17. Change in the immediate packaging (primary and functional secondary components) for the storage and shipment of the API
- 18. Change in the specifications of the immediate packaging for the storage and shipment of the API
- 19. Change to an analytical procedure on the immediate packaging of the API

3.2. S.7 Stability

- 20. Change in the retest period or shelf-life of the API
- 21. Change in the labelled storage conditions of the API

3.2. P Drug product (or FPP)

3.2. P.1 Description and composition of the FPP

- 22. Change in the composition of a solution dosage form
- 23. Change in the colouring system or the flavouring system currently used in the FPP
- 24. Change in weight of tablet coatings or capsule shells
- 25. Change in the composition of an immediate-release solid oral dosage form
- 26. Change or addition of imprints, embossing or other markings, including replacement or addition of inks used for product markings and change in scoring configuration
- 27. Change in dimensions without change in qualitative or quantitative composition and mean mass

3.2. P.3 Manufacture

- 28. Addition or replacement of a manufacturing site for part or all of the manufacturing process for an FPP
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- 31. Change in the manufacturing process of the FPP
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3.2. P.4 Control of excipients

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- 35. Change in specifications of an excipient to comply with an officially recognized pharmacopoeia

3.2. P.5 Control of FPP

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3.2. P.7 Container-closure system

- 39. Replacement or addition of a primary packaging type
- 40. Change in the package size
- 41. Change in the shape or dimensions of the container or closure
- 42. Change in qualitative and/or quantitative composition of the immediate packaging material
- 43. Change in the specifications of the immediate packaging
- 44. Change to an analytical procedure on the immediate packaging
- 45. Change in any part of the (primary) packaging material not in contact with the FPP formulation (e.g. colour of flip-off caps, colour code rings on ampoules, or change of needle shield)
- 46. Change to an administration or measuring device that is not an integral part of the primary packaging (excluding spacer devices for metered dose inhalers)

3.2. P.8 Stability

- 47. Change in the shelf-life of the FPP (as packaged for sale)
- 48. Change in the in-use period of the FPP (after first opening or after reconstitution or dilution)
- 49. Change in the labelled storage conditions of the finished pharmaceutical product (as packaged for sale), the product during the in-use period or the product after reconstitution or dilution

Appendix 1

Examples of changes that make a new application or extension application necessary

Appendix 2

Changes to excipients

1. BACKGROUND

This guideline provides the necessary information that must be submitted by all applicants to the Zambia Medicines Regulatory Authority (ZAMRA).

The Guideline was mainly adapted from the World Health Organisation (WHO) "Guidance on amendments in a dossier submitted within the prequalification program" and partly from the Thai Food and Drug Administration (TFDA) Variation Guidelines.

Further, the following compendial monographs: British Pharmacopoeia (BP), International Pharmacopoeia (Ph. Int.), Japanese Pharmacopoeia (JP), European Pharmacopoeia (Ph. Eur.), United States Pharmacopoeia (USP) and relevant global guidelines (i.e. WHO and ICH-guidelines) are the recommended references when compiling applications on amendments.

The Authority may request for additional information with respect to the amendment, where required. Failure to submit requested information within the stipulated period will lead to rejection of the application.

1.1 Objectives

These guidelines are intended to:

- assist applicants with the classification of changes made to the quality part of a finished pharmaceutical product (FPP) that has been granted marketing Authorisation;
- provide guidance on the technical and other general data requirements to support changes to the quality attributes of the active pharmaceutical ingredient (API) or FPP.

1.2 Scope and application

This guideline applies to amendment of all medicinal products which have been licensed by ZAMRA for use in humans. Application for Amendment shall be submitted by the marketing authorization holder.

This guideline applies to all amendments whether from the applicant's initiative or requested by the Authority. This guideline does not apply to medicines whose application is still under consideration by the Authority.

2. GUIDANCE FOR IMPLEMENTATION

2.1 Fees

Applicable fees are defined in a separate fee schedule. Note that ZAMRA reserves to determine the correct interpretation of the fee payable based on the published schedule.

2.2 Procedure and Timelines

The applicant submits an application in the appropriate format, forms, accompanied by the appropriate forms and fees.

ZAMRA evaluators conduct screening of application for completeness and confirmation of type of amendment and fee payable. Incomplete applications will then be rejected at this stage. The applicant is then notified of rejection of the application or notified of receipt of the application.

Should the application meet the first screening requirements the applicant is notified of the classification of the application as follows:

(i) Minor amendments - Notifications (MiA-N)

These are changes that could have minimal or no adverse effects on the overall safety, efficacy and quality of the FPP. Such notifications do not require prior acceptance, but must be notified to the Authority.

The Applications under this classification must provide evidence to fulfil the conditions and documentation requirements as listed. Within a period of two weeks (from date of notification of receipt) these notifications will be evaluated by ZAMRA and can be considered approved if no correspondence by ZAMRA with the applicant has been initiated within that time.

On the instance where an application is submitted as a notification by the applicant, but on evaluation ZAMRA reclassifies the amendment, it no longer will be deemed as a notification.

Should more information be requested by ZAMRA during evaluation of the notification a new period of two weeks begins upon submission of the new information.

(ii) Minor Amendments-Prior Approval (MiA-P)

These are changes that may have minor effects on the overall safety, efficacy and quality of the FPP. Applicants must satisfy themselves that they meet all of the prescribed conditions for the change and submit all required documentation with the amendment application. Prior approval by ZAMRA is always necessary before the amendments can be implemented.

(iii) Major Amendments-Prior Approval (MaA-P)

Amendment to a registered medicinal product that may affect significantly and/or directly the aspects of quality, safety and efficacy and it does not fall within the definition of minor Amendment.

2.3 Grouped Amendments

Individual changes normally require the submission of separate amendments. Grouping of amendments is acceptable only under the following circumstances:

- when amendments are consequential to each other, e.g. introduction of a new impurity specification that requires a new analytical procedure;
- when the same change affects multiple FPPs, e.g. addition of a new API manufacturing site for multiple FPPs;
- when all the changes are annual notification.

For the purposes of classification, an application involving two or more types of amendments will be considered as the highest risk type, e.g. amendment grouping both a minor change and a major change will be classified as a major change. Likewise, an application involving more than two minor amendments shall be reclassified as major.

Applicants should note that the amendment grouping only applies to Minor amendment-Notifications

Applicants are also advised to exercise caution whenever several changes to the same FPP are envisaged. Although each of the individual changes may be classified as a particular reporting type, classification within a higher risk category may be warranted as a result of the composite effect of these changes. In all such cases, applicants are advised to contact ZAMRA prior to submission of the amendment application to obtain guidance on classifying such changes.

2.4 New applications and extension applications

Certain changes are so fundamental that they alter the terms of the accepted dossier and consequently cannot be considered as changes. In these cases a new dossier must be submitted. Examples of such changes are listed in Appendix 1.

2.5 Labelling information

For any change to labelling information (SmPC, PIL, labels) not covered by the amendment categories described in this document, an application should be submitted stating the current and proposed changes.

2.6 Conditions to be fulfilled

For each amendment, attempts have been made to identify particular circumstances where lower reporting requirements (MiA-N, MiA-P) are possible. A change that does not meet all of the conditions stipulated for these specific circumstances is considered to be a MaA-P.

In some circumstances MaA-P categories have been specifically stated for a given amendment. This has been done to indicate to applicants what documents should be provided. This is for informational purposes only. The list of documentation is not intended to be comprehensive and further documentation may be required. For all changes it remains the responsibility of the applicant to provide all necessary documents to demonstrate that the change does not have a negative effect on the safety, efficacy or quality of the FPP.

2.7 Documentation required

Examples of amendments are organized according to the structure of the CTD. For each amendment, certain documents have been identified as supporting data and are organized according to CTD structure. Regardless of the documents specified, applicants should ensure that they have provided all relevant information to support the amendment.

Where applicable, the following should be included in the application:

- an amendment application form (a template can be downloaded from the web site). All sections of this form should be completed and the document signed. Electronic versions of the application form, both as a Word document and a scanned signed PDF, should be provided in addition to the printed version;
- an updated quality information summary (QIS);
- replacement of the relevant sections of the dossier as per CTD format;
- copies of SmPC, PIL and labels, if relevant.

It should be noted that the Authority reserves the right to request further information not explicitly described in these guidelines.

The QIS provides a summary of the key quality information from the product dossier. For FPPs that have an agreed-upon QIS, the QIS should be revised and submitted (in Word

format only) with every amendment application. Any revised sections within the QIS should be highlighted. If there is no change to the QIS as a result of the amendment, a statement should be made in the covering letter to this effect.

Alternative approaches to the principles and practices described in this document may be acceptable provided they are supported by adequate scientific justification. It is also important to note that the Authority may request information or material, or define conditions not specifically described in this guidance, in order to adequately assess the safety, efficacy and quality of an FPP.

3. GLOSSARY

The definitions provided below apply to the terms used in this guidance. They may have different meanings in other contexts and documents.

Active pharmaceutical ingredient (API)

A substance used in the FPP, intended to furnish pharmacological activity or to otherwise have direct effect in the diagnosis, cure, mitigation, treatment or prevention of disease, or to have direct effect in restoring, correcting or modifying physiological functions in human beings.

Active pharmaceutical ingredient (API) starting material

A raw material, intermediate, or an API that is used in the production of an API and that is incorporated as a significant structural fragment into the structure of the API. An API starting material can be an article of commerce, a material purchased from one or more suppliers under contract or commercial agreement, or produced in-house.

Applicant

For the purposes of this document, the term applicant refers to any person or entity who has participated in the procedure for prequalification of FPPs by submission of the required documentation on a product that has been listed after evaluation as prequalified.

Biobatch

The batch used to establish bioequivalence or similarity to the comparator product as determined in bioequivalence or biowaiver studies, respectively.

Final intermediate

The last reaction intermediate in the synthetic pathway that undergoes synthetic transformation to the API or the crude API. Purification is not considered to be a synthetic transformation.

Finished pharmaceutical product (FPP)

A finished dosage form of a pharmaceutical product which has undergone all stages of manufacture including packaging in its final container and labelling.

In-process control

Check performed during manufacture to monitor or to adjust the process in order to ensure that the final product conforms to its specifications.

Manufacturer

A company that carries out operations such as production, packaging, repackaging, labelling and re-labelling of pharmaceuticals.

Officially recognized pharmacopoeia (or compendium)

Those pharmacopoeias recognized by the Authority (i.e. The International Pharmacopoeia (Ph. Int.), the European Pharmacopoeia (Ph. Eur.), the British Pharmacopoeia (BP), the Japanese Pharmacopoeia (JP) and the United States Pharmacopeia (USP)).

Pilot-scale batch

A batch of an API or FPP manufactured by a procedure fully representative of and simulating that to be applied to a full production-scale batch. For example, for solid oral dosage forms, a pilot scale is generally, at a minimum, one-tenth that of a full production scale or 100 000 tablets or capsules, whichever is the larger, unless otherwise adequately justified.1

Production batch

A batch of an API or FPP manufactured at production scale by using production equipment in a production facility as specified in the application.

Stringent regulatory authority (SRA)

A stringent regulatory authority is:

- the medicines regulatory authority in a country which is: (a) a member of the International Conference on Harmonisation (ICH) (European Union (EU), Japan and the United States of America); or (b) an ICH Observer, being the European Free Trade Association (EFTA) as represented by Swiss Medic and Health Canada (as may be updated from time to time); or (c) a regulatory authority associated with an ICH member through a legally-binding, mutual recognition agreement including Australia, Iceland, Liechtenstein and Norway (as may be updated from time to time);
- only in relation to good manufacturing practices (GMP) inspections: a medicines regulatory authority that is a member of the Pharmaceutical Inspection Cooperation Scheme (PIC/S) as specified at http://www.picscheme.org

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4. ADMINISTRATIVE CHANGES

Des	Description of change		Documentation	Reporting
		to be	required	type
		fulfilled		
1	Change in the name and/or corporate address	1	1	Minor
	of the supplier of the FPP.			Amendment
	11			-
				Notification
				(MiA - N)

Conditions to be fulfilled

1. Confirmation that the supplier of the product remains the same legal entity.

Documentation required

1. A formal document from a relevant official body (e.g. the national medicines regulatory authority (NMRA)) in which the new name and/or address is mentioned.

Des	scription of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
2.	Change in the name or address of a	1	1–2	Minor
	manufacturer of an API that is not a supplier			Amendment
	of a prequalified API or that is not supported			-
	1 1			Notification
	by a CEP.			(MiA - N)

Conditions to be fulfilled

1. No change in the location of the manufacturing site and in the manufacturing operations.

- 1. A formal document from a relevant official body (e.g. NMRA) in which the new name and/or address is mentioned.
- 2. An updated Letter of Access in case of change in the name of the holder of the APIMF.

Description of change		Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
3.	Change in the name and/or address of a	1	1	Minor
	manufacturer of the FPP.			Amendment
				-
				Notification
				(MiA - N)

1. No change in the location of the manufacturing site and in the manufacturing operations.

Documentation required

1. Copy of the modified manufacturing authorization or a formal document from a relevant official body (e.g. NMRA) in which the new name and/or address is mentioned.

Desci	ription of change	Conditions to be fulfilled	Documentation required	Reporting type
4 Deletion of a manufacturing site or manufacturer involving:				
4a	production of the API starting material	1	1	Minor
4b	production or testing of the API intermediate or API	1–2	1	Amendment - Notification
4c	production, packaging or testing of the intermediate or FPP	1–2	1	(MiA – N)

Conditions to be fulfilled

- 1. At least one other site continues to perform the same function(s) as the site(s) intended to be deleted.
- 2. The deletion of the site is not a result of critical deficiencies in manufacturing.

Documentation required

1. Clear identification of the manufacturing, packaging and/or testing site to be deleted, in the letter accompanying the application.

5. CHANGES TO A C.E.P. OR TO A CONFIRMATION OF API-PREQUALIFICATION DOCUMENT

Descr	ription of change	Conditions to	Documentation	Reporting	
		be fulfilled	required	type	
5	Submission of a new or updated CEP for an API or starting material or intermediate used in the manufacturing process of the API:				
5a.1	from a currently accepted manufacturer	1–5	1–5	Minor	
5a.2		1–4	1–6	Amendment	
5a.3		1, 3–4	1–6	- Notification	
5b.1	from a new manufacturer	1–4	1–6	(MiA – N)	
5b.2		1, 3–4	1–6		

Conditions to be fulfilled

- 1. No change in the FPP release and shelf-life specifications.
- 2. Unchanged (excluding tightening) additional (to Ph. Eur.) specifications for any impurities including organic, inorganic and genotoxic impurities and residual solvents, with the exception of residual solvents when the limits stipulated comply with ICH requirements.
- 3. The manufacturing process of the API, starting material or intermediate does not include the use of materials of human or animal origin for which an assessment of viral safety data is required.
- 4. For low solubility APIs the polymorph is the same, and whenever particle size is critical (including low solubility APIs) there is no significant difference in particle size distribution, compared to the API lot used in the preparation of the biobatch.
- 5. No revision of the FPP manufacturer's API specifications is required.

- 1. Copy of the current (updated) CEP, including any annexes and a declaration of access for the CEP to be duly filled out by the CEP holder on behalf of the FPP manufacturer or applicant who refers to the CEP.
- 2. A written commitment that the applicant will inform the Authority in the event that the CEP is withdrawn and an acknowledgement that withdrawal of the CEP will require additional consideration of the API data requirements to support the product dossier.
- 3. Replacement of the relevant pages of the dossier with the revised information for the CEP submission.
- 4. (S.2.5) For sterile APIs, data on the sterilization process of the API, including validation data.
- 5. (P.8.2) In the case of the submission of a CEP for an API, if the quality characteristics of the API are changed in such a way that it may impact the stability of the FPP, a commitment to put under stability one batch of the FPP of at least pilot-scale, and to continue the study throughout the currently accepted shelf-life and to immediately report any out of specification results to the Authority
- 6. (S.4.1) Copy of FPP manufacturer's revised API specifications.

Descr	iption of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
6	6 Submission of a new or updated confirmation of API document			
6a.1	from a currently accepted manufacturer	1–3	1–3, 5	Minor
6a.2		1–2	1–5	Amendment
6b.1	from a new manufacturer	1–3	1–3, 5	-
6b.2		1–2	1–5	Notification
				(MiA – N)

- 1. No change in the FPP release and shelf-life specifications.
- 2. For low solubility APIs the API polymorph is the same, and whenever particle size is critical (including low solubility APIs) there is no significant difference in particle size distribution, compared to the API lot used in the preparation of the biobatch.

3. There is no difference in impurity profile of the proposed API to be supplied, including organic, inorganic, genotoxic impurities and residual solvents, compared to that of the API currently supplied. The proposed API manufacturer's specifications do not require the revision of the FPP manufacturer's API specifications.

Documentation required

- 1. Copy of the current (updated) confirmation of API document. The API manufacturer should duly fill out the authorization box with the name of the applicant or FPP manufacturer seeking to use the document.
- 2. Replacement of the relevant pages of the dossier with the revised information for the API.
- 3. (S.2.5) For sterile APIs, data on the sterilization process of the API, including validation.
- 4. (S.4.1) Copy of FPP manufacturer's revised API specifications.
- 5. (P.8.2) If the quality characteristics of the API are changed in such a way that it may impact the stability of the FPP, a commitment to put under stability one batch of at least pilot-scale of the FPP and to continue the study throughout the currently accepted shelf-life and to immediately report any out of specification results to the Authority.

Descr	Description of change		Documentation	Report ing
		to be	required	type
		fulfilled		
7	Submission of a new or updated	None	1	Minor
	transmissible spongiform encephalopathy (TSE) CEP for an excipient or API			Amendment -
	(addition or replacement)			Notification (MiA – N)

Conditions to be fulfilled

None

Documentation required

1. Copy of the current (updated) TSE CEP.

6. QUALITY CHANGES

3.2. S Drug substance (or API)

3.2. S.2 Manufacture

Descr	ription of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
8	Replacement or addition of a new manufac	cturing site or m	anufacturer of an A	API involving:
8a.1		1, 2, 4	1, 3–4	Minor
8a.2	API testing only	2, 4	1, 3–4	Amendment - Notification (MiA – N)
8b.1			No amendment is	required;
		2.4	such changes are	handled as
		3–4	amendments to the APIMF by	
			the APIMF holder	r .
8b.2	and heating of ADI starting material	4–5	1–2, 12	Minor
	production of API starting material			Amendment - prior
				approval (MiA – P)
8b.3		None	1,2,5, 7–8,12, 13	Major Amendment (MaA-P)
8c.1			No amendment is	required;
		2.4	such changes are	handled as
		3–4	amendments to the APIMF by	
	production of API intermediate		the APIMF holder	r.
8c.2	production of 711 1 intermediate	4, 6	1–2, 12	Minor Amendment – prior approval
				approv (MiA -

8c.3			1, 2, 5, 7–8, 12,	Major
		None	13	Amendment
			13	(MaA-P)
8d.1				Minor
				Amendment
	production of API (APIMF procedure)	3, 7–9	1, 2, 6, 8	– prior
				approval
	production of the first procedure)			(MiA - P)
8d.2				Major
		3, 7, 9	1, 2, 6–8	Amendment
				(MaA-P)
8e.1				Minor
				Amendment
		1, 9–11	1–2, 4, 8–9	– prior
	production of API (full dossier)			approval
	production of the familiary			(MiA – P)
8e.2			1, 2, 4, 5, 7–8,	Major
		None	10–11, 13	Amendment
				(MaA-P)

- 1. The API is non-sterile.
- 2. The transfer of analytical methods has been successfully undertaken.
- 3. The new site is supported by an APIMF that is currently accepted through the APIMF procedure and the FPP manufacturer holds a valid Letter of Access.
- 4. No change in the FPP manufacturer's API specifications.
- 5. The impurity profile of the API starting material is essentially the same as other accepted sources. The introduction of the new supplier does not require the revision of the API manufacturer's API starting material specifications. The route of synthesis is verified as identical to that already accepted.
- 6. Specifications (including in-process, methods of analysis of all materials), method of manufacture and detailed route of synthesis are verified as identical to those already accepted. The introduction of the new supplier does not require the revision of the API manufacturer's API intermediate specifications.
- 7. No change in the FPP release and end-of-shelf-life specifications.
- 8. No difference in impurity profile of the proposed API to be supplied, including organic,

inorganic and genotoxic impurities and residual solvents. The proposed API manufacturer's specifications do not require the revision of the FPP manufacturer's API specifications.

- 9. For low-solubility APIs the API polymorph is the same, and whenever particle size is critical (including low-solubility APIs) there is no significant difference in particle size distribution, compared to the API lot used in the preparation of the biobatch.
- 10. Specifications (including in-process controls, methods of analysis of all materials), method of manufacture (including batch size) and detailed route of synthesis are verified as identical to those already accepted (such situations are generally limited to additional sites by the same manufacturer or a new contract manufacturing site with evidence of an acceptable and similar quality system to that of the main manufacturer).
- 11. Where materials of human or animal origin are used in the process, the manufacturer does not use any new supplier for which assessment is required of viral safety or of compliance with the current WHO Guidelines on transmissible spongiform encephalopathies in relation to biological and pharmaceutical products or EMA's Note for guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products or equivalent guidelines of the ICH region and associated countries.

- 1. (S.2.1) Name, address, and responsibility of the proposed site or facility involved in manufacture or testing (including block(s) and unit(s)). A valid testing authorization or a certificate of GMP compliance, if applicable.
- 2. (S.2.2) A side-by-side comparison of the manufacturing flowcharts for production of the API, intermediate, or API starting material (as applicable) at the parent and proposed sites and a tabulated summary of the differences.
- 3. (S.4.3) Copies or summaries of validation reports or method transfer reports, which demonstrate equivalence of analytical procedures to be used at the proposed testing site.
- 4. (S.4.4) Description of the batches, copies of certificates of analysis and batch analysis data (in a comparative tabular format) for at least two (minimum pilot-scale) batches of the API from the currently accepted and proposed manufacturers and/or sites.
- 5. Relevant sections of (S) documentation in fulfilment of requirements for full information provided in the dossier under section 3.2.S of the ZAMRA *Guidance on Submission of Applications for Marketing Authorisation in Common Technical Document Format: Quality.*

- 6. The open part of the new APIMF (with a Letter of Access provided in Module 1) and documentation in fulfilment of requirements for the APIMF option under section 3.2.S of the *Guidelines on submission of an application for registration: quality part*.
- 7. (P.8.2) If the quality characteristics of the API are changed in such a way that it may impact the stability of the FPP, a commitment to put under stability one production-scale batch of the FPP and to continue the study throughout the currently accepted shelf-life and to immediately report any out of specification results to the Authority.
- 8. (S.4.1) A copy of the FPP manufacturer's API specifications.
- 9. (S.2) A declaration from the supplier of the prequalified FPP that the route of synthesis, materials, quality control procedures and specifications of the API and key (ultimate) intermediate in the manufacturing process of the API (if applicable) are the same as those already accepted.
- 10. A discussion of the impact of the new API on the safety, efficacy and quality of the FPP.
- 11. For low solubility APIs where polymorphic form is different or whenever particle size is critical (including low-solubility APIs) where there is a significant difference in particle size distribution compared to the lot used in the biobatch, evidence that the differences do not impact the quality and bioavailability of the FPP.
- 12. Certificates of analysis for at least one batch of API starting material or intermediate (as applicable) issued by the new supplier and by the API manufacturer. Comparative batch analysis of final API manufactured using API starting material or intermediate (as applicable) from the new source and from a previously accepted source. For an alternative source of plant-derived starting material, control of pesticide residues must be established. This can either be in the form of an attestation from the starting material supplier that no pesticides are used during the growth of the plant material, or by providing the results of pesticide screening from one batch of the starting material.
- 13. An analysis of the impact of the change in supplier with respect to the need for API stability studies and a commitment to conduct such studies if necessary.

Description of change	Conditions to	Documenta	Reporting
	be fulfilled	tion	type
		required	

9a	change or addition of a manufacturing	1–5	Minor Amendment – prior	
	block or unit at a currently accepted site		approval (MiA – P)	
9b	of API manufacture	1, 3–5	1–4	Minor
				Amendment
				– prior
				approval
				(MiA - P)

- 1. The API is non-sterile.
- 2. The API manufacturing block or unit is currently accepted through the APIMF procedure.
- 3. The same quality system covers currently accepted and proposed units or blocks.
- 4. For low-solubility APIs, there is no change in the polymorphic form and whenever particle size is critical (including low solubility APIs) there is no significant change to the particle size distribution compared to the API lot used in the preparation of the biobatch.
- 5. No change in the route of synthesis, quality control procedures and specifications of the API and key (ultimate) intermediate in the manufacturing process of the API (if applicable). Minor changes in the equipment are acceptable.

- 1. (S.2) A declaration from the supplier of the FPP that the route of synthesis, quality control procedures and specifications of the API and key (ultimate) intermediate in the manufacturing process of the API (if applicable) are the same as those already accepted.
- 2. (S.2.1) Name, address, and responsibility of the proposed production site or facility involved in manufacturing and/or testing (including block(s) and unit(s)). A valid manufacturing and/or testing authorization and a certificate of GMP compliance, if available.
- 3. (S.4.4) Description of the batches, copies of certificates of analysis and batch analysis data (in a comparative tabular format) for at least two (minimum pilot-scale) batches of the API from the currently accepted and proposed units or blocks.
- 4. (S.2.2) A summary of differences between manufacture and control of the API at the currently accepted and proposed units or blocks, if applicable.

Description of change		Conditions to	Documentation	Reporting
		be fulfilled	required	type
10a	change in the manufacturing process	1–3, 9	1–2, 8	Minor
10b.1	of the API	1–2, 4, 6–9	3–4, 11–12	Amendment – prior approval
10b.2		1–2, 4, 6–8, 10	3–4, 11–12	(MiA - P)
10c		1–2, 4–7	3–4, 11–12	
10d		None	2–14	Major Amendment (MaA-P)

- 1. No change in the physical state (e.g. crystalline, amorphous) of the API.
- 2. For low solubility APIs, there is no change in the polymorphic form and whenever particle size is critical (including low solubility APIs) there is no significant change in the particle size distribution compared to that of the API lot used in the preparation of the biobatch.
- 3. The API manufacturing site is currently accepted through the APIMF procedure.
- 4. Where materials of human or animal origin are used in the process, the manufacturer does not use any new process for which assessment of viral safety data or TSE risk assessment is required.
- 5. No change in the route of synthesis (i.e. intermediates remain the same) and there are no new reagents, catalysts or solvents used in the process.
- 6. No change in qualitative and quantitative impurity profile or in physicochemical properties of the API.
- 7. The change does not affect the sterilization procedures of a sterile API.
- 8. The change involves only steps before the final intermediate.
- 9. The change does not require revision of the starting material, intermediate or API specifications.
- 10. The change does not require revision of the API specifications.

- 1. A copy of the APIMF amendment acceptance letter.
- 2. (P.8.2) If the quality characteristics of the API are changed in a way that may impact the stability of the FPP, a commitment to put under stability one production-scale batch of the FPP and to continue the study throughout the currently accepted shelf-life and to immediately report any out of specification results to the Authority.
- 3. (S.2.2) A side-by-side comparison of the current process and the new process.
- 4. (S.2.2) A flow diagram of the proposed synthetic process(es) and a brief narrative description of the proposed manufacturing process(es).
- 5. (S.2.3) Information on the quality and controls of the materials (e.g. raw materials, starting materials, solvents, reagents, catalysts) used in the manufacture of the proposed API, where applicable.
- 6. (S.2.3) Either a TSE CEP for any new source of material or, where applicable, documented evidence that the specific source of the material that carries a risk of TSE has previously been assessed by the competent authority and shown to comply with the current WHO guidelines on transmissible spongiform encephalopathies in relation to biological and pharmaceutical products or EMA's Note for guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products or equivalent guidelines of the ICH region and associated countries.
- 7. (S.2.4) Information on controls of critical steps and intermediates, where applicable.
- 8. (S.2.5) Evidence of process validation and/or evaluation studies for sterilization, if applicable.
- 9. (S.3.1) Evidence for elucidation of structure, where applicable.
- 10. (S.3.2) Information on impurities.
- 11. (S.4.1) A copy of currently accepted specifications of API (and starting material and intermediate, if applicable).
- 12. (S.4.4) Description of the batches, certificates of analysis or batch analysis report, and summary of results, in a comparative tabular format, for at least two batches (minimum pilot-scale) manufactured according to the current and proposed processes.
- 13. (S.7.1) Results of two batches of at least pilot-scale with a minimum of three months of accelerated (and intermediate as appropriate) and three months of long-term testing of the proposed API.
- 14. For low-solubility APIs where the polymorphic form has changed or whenever particle size is critical (including low-solubility APIs) where there is dissimilar particle size distribution compared to the lot used in the biobatch, evidence that the differences do not impact the quality and bioavailability of the FPP.

	Description of change	Conditions to	Documentation	Reporting			
		be fulfilled	required	type			
11	Change in the in-process tests or limits applied during the manufacture of the API:						
11a	any change in the manufacturing process	1	Major Amendment				
	controls		(MaA-P)				
11b	tightening of in-process limits	2–4	1	Minor			
11c	addition of a new in-process test and limit	2, 5	1–5	Amendment - Notification (MiA – N)			
11d	addition or replacement of an in-process test as a result of a safety or quality issue	None	1–5, 7, 8–10	Major Amendment - Prior Approval(M aA-P)			
11e. 1	deletion of an in-process test	2, 6–7	1–3, 6	Minor Amendment – prior approval (MiA – P)			
11e. 2		None	1–3, 7–10	Major Amendment (MaA-P)			
11f	relaxation of the in-process test limits	None	1–3, 5, 7–10] (11144 1)			
Cond	Conditions to be fulfilled						

- 1. API manufacturing site is currently accepted through the APIMF procedure.
- 2. The change is not necessitated by unexpected events arising during manufacture e.g. a new unqualified impurity or a change in total impurity limits.
- 3. The change is within the range of currently accepted limits.
- 4. The analytical procedure remains the same, or changes to the analytical procedure are minor.
- 5. Any new analytical procedure does not concern a novel non-standard technique or a standard technique used in a novel way.
- 6. The affected parameter is non-significant.
- 7. The change does not affect the sterilization procedures of a sterile API.

- 1. A comparison of the currently accepted and the proposed in-process tests.
- 2. (S.2.2) Flow diagram of the proposed synthetic process (es) and a brief narrative description of the proposed manufacturing process (es).
- 3. (S.2.4) Information on the controls performed at critical steps of the manufacturing process and on intermediates of the proposed API.
- 4. Details of any new non-pharmacopoeial analytical method and validation data where relevant.
- 5. Justification for the new in-process test and/or limits.
- 6. Justification and/or risk-assessment showing that the parameter is non-significant.
- 7. (S.2.5) Evidence of process validation and/or evaluation studies for sterilization, where applicable.
- 8. (S.3.2) Information on impurities, if applicable.
- 9. (S.4.1) Copy of currently accepted specifications of API (and intermediates, if applicable).
- 10. (S.4.4) Description of the batches, certificates of analysis or batch analysis report and summary of results, in a comparative tabular format, for at least two batches (minimum pilot-scale) for all specification parameters.

Descrip	otion of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
12	Change in batch size of the API or interest	nediate involving	:	
12a	up to 10-fold compared to the currently accepted batch size	1–2, 4, 6	1, 3–4	Minor Amendment – prior
12b.1	downscaling	1–4	1, 3–4	approval
12b.2		1–3	1–4	(MiA – P)
12c	any change in scale (APIMF procedure)	5	1–2, 4–5	
12d	more than 10-fold increase compared to the currently accepted batch size	1–2, 4, 6	1, 3–4, 6	Major Amendment (MaA-P)

- 1. No changes to the manufacturing process other than those necessitated by changes in scale (e.g. use of a different size of equipment).
- 2. The change does not affect the reproducibility of the process.
- 3. The change is not necessitated by unexpected events arising during manufacture or due to stability concerns.
- 4. The change does not concern a sterile API.
- 5. The API manufacturing site and batch size is currently accepted through the APIMF procedure.
- 6. The proposed batch size increase is relative to either the originally accepted batch size, or the batch size accepted through a subsequent major or minor amendment.

- 1. (S2.2) A brief narrative description of the manufacturing process.
- 2. (S.2.5) Where applicable, evidence of process validation and/or evaluation studies for sterilization.
- 3. (S.4.1) Copy of the currently accepted specifications of the API (and of the intermediate, if applicable).
- 4. (S.4.4) Batch analysis data (in tabular format) issued by the FPP manufacturer for a minimum of two batches each of the currently accepted batch size and the proposed batch size.
- 5. A copy of the APIMF amendment acceptance letter.
- 6. Validation data of the manufacturing process for the higher batch size.

Description of change		Conditions	Documentation	Reporting		
		to be	required	type		
		fulfilled				
13	Change to the specifications or analytical procedures applied to materials used in the					
	manufacture of the API (e.g. raw material	s, starting materi	ials, reaction interm	ediates,		
	solvents, reagents, catalysts) involving:					
13a	any change	1	No amendment is	required;		
			such changes are l	nandled as		
			amendments to the	e APIMF by		
			the APIMF holder			
13b	tightening of the specification limits	2–4	1–3	Minor		
13c	minor change to an analytical procedure	5–7	2–3	Amendment		
				Notification		
				(MiA – N)		
13d	addition of a new specification	2, 7–9	1–3	Minor		
	parameter and a corresponding			Amendment – Prior		
	analytical procedure where necessary			Approval		
13e	deletion of a specification parameter or	2, 10	1–4	(MiA – PA)		
	deletion of an analytical procedure					
13f	addition or replacement of a	None	1–3, 5	Major		
	specification parameter as a result of a			Amendment		

	safety or quality issue			(MaA-P)
13g	relaxation of the currently accepted	4, 7, 9–10	1, 3–4	
	specification limits for solvents,			
	reagents, catalysts and raw materials			
13h	relaxation of the currently accepted	None	1–3, 5	
	specification limits for API starting			
	materials and intermediates			

- 1. API manufacturing site is currently accepted through the APIMF procedure.
- 2. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 3. Any change is within the range of currently accepted limits.
- 4. The analytical procedure remains the same.
- 5. The method of analysis is based on the same analytical technique or principle (e.g. changes to the analytical procedure are within allowable adjustments, to column length and other parameters, but do not include amendments beyond the acceptable ranges or a different type of column and method).
- 6. Appropriate validation studies have been performed in accordance with the relevant guidelines and show that the updated analytical procedure is at least equivalent to the former analytical procedure.
- 7. No change to the total impurity limits; no new impurities are detected.
- 8. Any new analytical procedure does not concern a novel non-standard technique or a standard technique used in a novel way.
- 9. The change does not concern a genotoxic impurity.
- 10. The affected parameter is non-significant or the alternative analytical procedure has been previously accepted.

- 1. Comparative table of currently accepted and proposed specifications.
- 2. (S.2.3) Information on the quality and controls of the materials (e.g. raw materials, starting materials, solvents, reagents, catalysts) used in the manufacture of the proposed API, where applicable.
- 3. (S.2.4) Information on intermediates, where applicable.
- 4. Justification and/or risk assessment showing that the parameter is non-significant.
- 5. (S.3.2) Information on impurities, where applicable.

3.2. S.4 CONTROL OF THE API BY THE API MANUFACTURER

Description of change		Cond	litions	Documentation	Reporting
		to be		required	type
		fulfil	led		
14	Changes to the test parameters, acceptance criteria, or analytical procedures of the API				
	manufacturer that do not require a change to	o the F	PP manı	ufacturer's API spec	cifications
	involving:				
14a	a. API supported through the APIMF proces	dure.	1–2	No amendment is	required;
				such changes are l	nandled as
				amendments to the	e associated
				APIMF	
14b	b. API not supported through the APIMF		2	1–4	Minor
	procedure.				Amendment
					– Prior
					Approval
					(MiA – PA)

Conditions to be fulfilled

- 1. The revised test parameters, acceptance criteria, or analytical procedures have been submitted as amendments to the associated APIMF and accepted.
- 2. The API manufacturer has provided the relevant documentation to the FPP manufacturer. The FPP manufacturer has considered the API manufacturer's revisions and determined that no consequential revisions to the FPP manufacturer's API test parameters, acceptance criteria, or analytical procedures are required to ensure that adequate control of the API is maintained.

- 1. (S.4.1) Copy of the current and proposed API specifications dated and signed by the API manufacturer.
- 2. (S.4.2) Copies or summaries of analytical procedures, if new analytical procedures are used.
- 3. (S.4.3) Copies or summaries of validation reports for new or revised analytical procedures, if applicable.
- 4. Justification as to why the change does not affect the FPP manufacturer's specifications.

3.2. S.4 CONTROL OF THE API BY THE FPP MANUFACTURER

Descrip	tion of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
15	Change to the test parameters or acceptar	nce criteria of	the API specification	ons of the FPP
	manufacturer involving:			
15a	updating a test parameter or acceptance	11	1–5	AN
	criterion controlled in compliance with			Minor
	an officially recognized			Amendment
	pharmacopoeial monograph as a result			Notification
	of an update to this monograph to			(MiA – N)
	which the API is controlled.			
15b.1		1–2	1, 6	Minor
130.1	deletion of a test parameter	1-2	1, 0	Amendment
				- Prior
				Approval
				(MiA – PA)
15b.2		10	1, 6, 8	Minor
				Amendment
				Notification
				(MiA – N)
15b.3		None	1, 6	Major
				amendment
				(MaA-P)
15c.1	addition of a test parameter	1, 4–8	1–6	Minor
15c.2		1, 5–6, 10	1–6, 8	Amendment – Prior
15c.3		1, 5–6	1–6	Approval
				(MiA – PA)
15c.4		None	1–7	Major
				Amendment
15.1.1	monle compant of a test manager star.	1 5 0	1.6	(MaA-P)
15d.1	replacement of a test parameter	1, 5–8	1–6	Minor

15d.2		5, 7, 10	1–6, 8	Amendment	
				– Prior	
				Approval	
				(MiA - PA)	
15d.3		None	1–7	Major	
				Amendment	
				(MaA-P)	
15e.1	tightening of an acceptance criterion	1, 3, 9	1, 6	Minor	
				Amendment	
				_	
				Notification	
				(MiA - N)	
15f.1	relaxation of an acceptance criterion	1, 5–9	1, 6	Minor	
15f.2		5, 7, 10	1, 6, 8	Amendment	
		, ,	, ,	– Prior	
				Approval	
				(MiA - PA)	
15f.3		None	1, 6–7	Major	
				Amendment	
				(MaA-PA)	
Conditions to be fulfilled					

- 1. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 2. The deleted test has been demonstrated to be redundant with respect to the remaining tests.
- 3. The change is within the range of currently accepted acceptance criteria.
- 4. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 5. For insoluble APIs there is no change in the polymorphic form and whenever particle size is critical (including low-solubility APIs) there is no change in particle size distribution acceptance criteria.
- 6. No additional impurity found over the ICH identification threshold.
- 7. The change does not concern sterility testing.
- 8. The change does not involve the control of a genotoxic impurity.
- 9. The associated analytical procedure remains the same.
- 10. The change has resulted from a revision of the API manufacturer's specifications and is accepted as part of an APIMF amendment.
- 11. No change is required in FPP release and shelf-life specifications.

- 1. (S.4.1) A copy of the proposed API specifications (of the FPP manufacturer) dated and signed by authorized personnel and a comparative table of currently accepted and proposed specifications. In addition, if the change has resulted from a revision to the API manufacturer's specifications, a copy of the API specifications (of the API manufacturer) dated and signed by authorized personnel and a comparative table of currently accepted and proposed specifications.
- 2. (S.4.2) Copies or summaries of analytical procedures, if new analytical procedures are used.
- 3. (S.4.3) Copies or summaries of validation or verification reports issued by the FPP manufacturer, if new analytical procedures are used.
- 4. (S.4.3) Where an in-house analytical procedure is used and a pharmacopoeial standard is claimed, results of an equivalence study between the in-house and pharmacopoeial methods.
- 5. (S.4.4) Description of the batches, certificates of analysis or batch analysis report, and summary of results in tabular format, for at least one batch if new tests and/or analytical methods are implemented.
- 6. (S.4.5) Justification of the proposed API specifications (e.g. test parameters, acceptance criteria, or analytical procedures).
- 7. (P.2) Where changes have occurred to the particle size criteria of an insoluble API or wherever particle size is critical, evidence is provided that the changes do not affect the in vitro release properties and bioavailability of the FPP. In general, it is sufficient to provide multipoint comparative dissolution profiles (in three media covering the physiological range (pH 1.2 or (0.1N HCl), 4.5 and 6.8) without surfactant) for one batch of FPP manufactured using API that meets the proposed criteria; one batch of FPP manufactured using API that meets the currently accepted criteria; and data on the FPP batch used in the registration bioequivalence study. However, if the routine dissolution medium contains a surfactant, the applicant should contact WHO-PQP for advice. For changes to the polymorph of an insoluble API the applicant should contact WHO-PQP for advice before embarking upon any investigation.
- 8. Copy of the APIMF amendment acceptance letter.

Descr	iption of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
16	16 Change to the analytical procedures used to control the API by the FPP manufacturer			

	involving:			
16a	change in an analytical procedure as a	None	1–3	Minor
	result of a revision to the officially			Amendment
	recognized pharmacopoeial monograph to			Notification
	which the API is controlled.			(MiA – N)
16b	change from a currently accepted in-	None	1–4	Minor
	house analytical procedure to an			Amendment – Prior
	analytical procedure in an officially			Approval
	recognized pharmacopoeia or from the			(MiA – PA)
	analytical procedure in one officially			
	recognized pharmacopoeia to an			
	analytical procedure in another official			
	recognized pharmacopoeia			
16c.	addition of an analytical procedure	1–3	1–3	Minor
1				Amendment
				Notification
				(MiA – N)
16c.		3, 8	1–3, 5	Minor
2				Amendment – Prior
16c.		8	1–3, 5	Approval
3				(MiA – PA)
16c.		None	1–3	Major
4				Amendment
16d.	modification or replacement of an	1–6	1–4	(MaA-PA) Minor
1	analytical procedure		<u> </u>	Amendment
16d.		2–3, 5–6, 8	1–5	– Prior
2		2 5,5 0,0	1 3	Approval (MiA – PA)
16d.		1-3, 5-6	1–4	
3		1-3, 3-0	1—4	
16d.		560	1–5	
100.		5–6, 8	1–3	

4				
16d.		None	1–4	Major
5				Amendment
				(MaA-PA)
16e.	deletion of an analytical procedure	6–7	1, 6	Minor
1				Amendment
				– Prior
16e.		6, 8	1, 5, 6	Approval
2				(MiA – PA)
16e.		None	1, 6	Major
3				Amendment
				(MaA-PA)

- 1. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 2. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 3. No new impurities have been detected as a result of the use of the new analytical method.
- 4. The method of analysis is based on the same analytical technique or principle (e.g. changes to the analytical procedure are within allowable adjustments to column length and other parameters, but do not include amendments beyond the acceptable ranges or a different type of column and method), and no new impurities are detected.
- 5. Comparative studies are available demonstrating that the proposed analytical procedure is at least equivalent to the currently accepted analytical procedure.
- 6. The change does not concern sterility testing.
- 7. The deleted analytical procedure is an alternative method and is equivalent to a currently accepted method.
- 8. The new or modified analytical method is identical to that used by the API manufacturer and has been accepted as part of an amendment to the associated APIMF.

- 1. (S.4.1) Copy of the proposed API specifications dated and signed by authorized personnel and a comparative table of currently accepted and proposed specifications.
- 2. (S.4.2) Copies or summaries of analytical procedures if new or significantly modified analytical procedures are used.
- 3. (S.4.3) Copies or summaries of validation or verification reports issued by the FPP manufacturer if new or significantly modified analytical procedures are used.
- 4. (S.4.4) Comparative analytical results demonstrating that the proposed analytical procedures are at least equivalent to the accepted analytical procedures.
- 5. A copy of the APIMF acceptance letter.
- 6. (S.4.5) Justification for the deletion of the analytical procedure, with supporting data.

3.2. S.6 CONTAINER-CLOSURE SYSTEM

Descr	iption of change	Conditions	Documentation	Report-ing
		to be	required	type
		fulfilled		
17a	Change in the immediate packaging	3, 4	1–2, 4	Minor
17b	(primary and functional secondary	1–2, 4	2–3	Amendment
17c	components) for the storage and	4	1–3	– Prior
	shipment of the API			Approval
				(MiA – PA)

Conditions to be fulfilled

- 1. Results demonstrate that the proposed primary packaging type is at least equivalent to the currently accepted primary packaging type with respect to its relevant properties (e.g. including results of transportation or interaction studies, and moisture permeability among others).
- 2. The change does not concern a sterile API.
- 3. The change has previously been accepted through the APIMF procedure.
- 4. The change is not the result of stability issues.

- 1. (S.2.5) Evidence of process validation and/or evaluation studies for sterilization if different from the current process.
- 2. (S.6) Information on the proposed primary packaging (e.g. description and specifications) and data in fulfillment of condition 1.
- 3. (S.7.1) Results of (or a commitment to study in the case of demonstrated equivalent or more protective packaging) a minimum of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing of the API in the proposed primary packaging type.
- 4. A copy of the APIMF amendment acceptance letter.

Descr	iption of change	Conditions	Documentatio	Reporting
		to be	n required	type
		fulfilled		
18	Change in the specifications of the immedia	ate packaging for	r the storage and s	hipment of
	the API involving:			
18a	tightening of specification limits	1–2	1	Minor
18b	addition of a test parameter	2–3	1–3	Amendment
				_
				Notification
				(MiA – N)
18c	deletion of a non-critical parameter	2	1, 4	Minor
				Amendment
				– Prior
				Approval
				(MiA – PA)
18d	any change (APIMF procedure)	4	No amendment i	s required;
			such changes are handled as	
			amendments to the associated	
			APIMF	

- 1. The change is within the range of currently accepted limits.
- 2. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 3. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 4. The change has previously been accepted through the APIMF procedure.

- 1. (S.4.5) Comparative table of currently accepted and proposed specifications, justification of the proposed specifications.
- 2. (S.4.2) Details of method and summary of validation of new analytical procedure.
- 3. (S.6) Certificate of analysis for one batch.
- 4. Justification to demonstrate that the parameter is not critical.

Descr	iption of change	Conditions to	Documentation	Reporting	
		be fulfilled	required	type	
19	Change to an analytical procedure on the immediate packaging of the API involving:				
19a	minor change to an analytical procedure	1–3	1	Minor	
19b	other changes to an analytical procedure	2–4	1	Amendme	
	including addition or replacement of an			nt – Prior	
	analytical procedure			Approval	
19c	deletion of an analytical procedure	5	2	(MiA –	
				PA)	
19d	any change (APIMF procedure)	6	No amendment is such changes are lamendments to the APIMF	handled as	

- 1. The method of analysis is based on the same analytical technique or principle (e.g. changes to the analytical procedure are within allowable adjustments to column length and other parameters, but do not include amendments beyond the acceptable ranges or a different type of column and method).
- 2. Appropriate (re)validation studies have been performed in accordance with the relevant guidelines.
- 3. Comparative studies indicate the new analytical procedure to be at least equivalent to the currently accepted procedure.
- 4. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 5. The deleted analytical procedure is an alternative method and is equivalent to a currently accepted method.
- 6. The change has previously been accepted through the APIMF procedure.

Documentation required

- 1. (S.6) Comparative validation results demonstrating that the currently accepted and proposed procedures are at least equivalent.
- 2. Justification for deletion of the analytical procedure.

3.2. S.7 STABILITY

Desci	ription of change	Conditions to be	Documentation	Reporting	
		fulfilled	required	type	
20	20 Change in the retest period or shelf-life of the API involving:				
20a	any change (APIMF procedure)	4	4	Minor	
				Amendment	
				– Prior	
				Approval	
				(MiA – PA)	

20b	reduction	3	1–2	Minor
				Amendment
				_
				Notification
				(MiA – N)
20c	extension	1–2	1–3	Minor
				Amendment
				– Prior
				Approval
				(MiA – PA)

- 1. No change to the primary packaging in direct contact with the API or to the recommended condition of storage.
- 2. Stability data were generated in accordance with the currently accepted stability protocol.
- 3. The change is not necessitated by unexpected events arising during manufacture or because of stability concerns.
- 4. The revised retest period has previously been accepted through the APIMF procedure.

- 1. (S.7.1) Proposed retest period or shelf-life, summary of stability testing according to currently accepted protocol and test results.
- 2. (S.7.2) Updated post-acceptance stability protocol and stability commitment and justification of change, when applicable.
- 3. (S.7.3) Stability data to support the change.
- 4. A copy of the APIMF acceptance letter.

Descr	iption of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
21	21 Change in the labelled storage conditions of the API involving:			

21a	any change in storage conditions	1	1	Minor
	(APIMF procedure)			Amendment
				– Prior
				Approval
				(MiA – PA)
21b	any change in storage conditions	2	2	Minor
				Amendment
				– Prior
				Approval
				(MiA – PA)
	A change in storage conditions to be in	1-2	1-2	Minor
	line with the Authority's recommended			Amendment
	storage statement			_
				Notification
				(MiA – N)

- 1. The revised storage conditions have previously been accepted through the APIMF procedure.
- 2. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.

Documentation required

- 1. A copy of the APIMF acceptance letter.
- 2. (S.7.1) Stability and/or compatibility test results to support the change to the storage conditions.

3.2. P DRUG PRODUCT (OR FPP)

3.2. P.1 DESCRIPTION AND COMPOSITION OF THE FPP

Desci	ription of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
22a	Change in the composition of a	1–6	2, 4, 7, 9–10	Minor

		solution dosage form			Amendment
					– Prior
					Approval
					(MiA – PA)
2	2b		None	1–10	Major
					amendment
					(MaA-PA)

- 1. The affected excipient(s) does/do not function to affect the solubility and/or the absorption of the API.
- 2. The affected excipient(s) does/do not function as a preservative or preservative enhancer.
- 3. No change in the specifications of the affected excipient(s) or the FPP.
- 4. No change in the physical characteristics of the FPP (e.g. viscosity, osmolality, pH).
- 5. The change does not concern a sterile FPP.
- 6. The excipients are qualitatively the same. The change in the amount (or concentration) of each excipient is within $\pm 10\%$ of the amount (or concentration) of each excipient in the originally prequalified product.

- 1. Supporting clinical or comparative bioavailability data or justification for not submitting a new bioequivalence study according to the current ZAMRA guidelines on bioequivalence.
- 2. (P.1) Description and composition of the FPP.
- 3. (P.2) Discussion on the components of the proposed product (e.g. choice of excipients, compatibility of API and excipients, suitability studies on the packaging system for the changed product).
- 4. (P.3) Batch formula, description of manufacturing process and process controls, controls of critical steps and intermediates, process validation protocol and/or evaluation.
- 5. (P.4) Control of excipients, if new excipients are proposed.
- 6. (P.4.5) If applicable, either a CEP for any new component of animal origin susceptible to TSE risk or, where applicable, documented evidence that the specific source of the TSE risk material has been previously assessed by an NMRA in the ICH region or associated countries and shown to comply with the scope of the current guidelines in the countries of the ICH region or associated countries. The following information should be included for each such material: name of manufacturer, species and tissues from which the material is derived, country of origin of the source animals, and use of the material.
- 7. (P.5) Copies of FPP release and shelf-life specifications and certificates of analysis for a minimum of two pilot- or production-scale batches. If applicable, data to demonstrate that the new excipient does not interfere with the analytical procedures for the FPP.
- 8. (P.8.1) Results of stability testing generated on at least two pilot- or production-scale batches with a minimum of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing.
- 9. (P.8.2) Updated post-acceptance stability protocol and stability commitment to place the first production-scale batch of each strength of the proposed product into the long-term stability programme (bracketing and matrixing for multiple strengths and packaging components could be applied, if scientifically justified).
- 10. (R.1) Copies of relevant pages of blank master production documents with changes highlighted, as well as relevant pages of the executed production document for one batch and confirmation that there are no changes to the production documents other than those highlighted.

Desci	ription of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
23	Change in the colouring system or the flavor	ouring system c	urrently used in the	FPP
	involving:			
23a	reduction or increase of one or more	1–3, 6	1, 4, 6–7	Minor
	components of the colouring or the			Amendment
	flavouring system			– Prior
				Approval
				(MiA – PA)
23b	deletion, addition or replacement of one	1–6	1–7	Minor
	or more components of the colouring or			Amendment
	the flavouring system			– Prior
				Approval
				(MiA – PA)

- 1. No change in the functional characteristics of the pharmaceutical form e.g. disintegration time or dissolution profile.
- 2. Any minor adjustment to the formulation to maintain the total weight is made using an excipient which currently makes up a major part of the FPP formulation.
- 3. Specifications for the FPP are updated only with respect to appearance, odour and/or taste or if relevant, deletion or addition of a test for identification.
- 4. Any new component must comply with section 3.2.P.4 of the ZAMRA guidelines on registration of medicines: quality part
- 5. Any new component does not include the use of materials of human or animal origin for which assessment of viral safety data is required, or is in compliance with the current *ZAMRA guidelines* on registration of medicines: quality part or an equivalent guide from the ICH region and associated countries.
- 6. Where applicable, the change does not affect the differentiation between strengths and for paediatric formulations it does not require submission of results of taste acceptability studies.

- 1. Sample of the FPP.
- 2. (P.2) Discussion on the components of the FPP (e.g. compatibility of API and qualitative composition of the colouring or flavouring system if purchased as a mixture, with specifications, if relevant).
- 3. (P.4.5) Either a CEP for any new component of animal origin susceptible to TSE risk or, where applicable, documented evidence that the specific source of the TSE risk material has been previously assessed by an NMRA in the ICH region or associated countries and shown to comply with the scope of the current guidelines in the countries of the ICH region or associated countries. The following information should be included for each such material: name of manufacturer, species and tissues from which the material is derived, country of origin of the source animals, and use of the material.
- 4. (P.5) Copies of revised FPP release and shelf-life specifications and certificates of analysis for a minimum of two pilot- or production-scale batches.
- 5. (P.5.3) If applicable, data to demonstrate that the new excipient does not interfere with the analytical procedures for the FPP.
- 6. (P.8.1) Results of stability testing generated on at least two pilot- or production-scale batches with a minimum of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing.
- 7. (R.1) Copies of relevant sections of blank master production documents with changes highlighted as well as relevant pages of the executed production documents for one batch and confirmation that there are no changes to the production documents other than those highlighted.

Descr	iption of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
24	24 Change in weight of tablet coatings or capsule shells involving:			
24a	immediate-release oral FPPs	1–3	2–5	Minor
				Amendment
				– Prior
				Approval
				(MiA – PA)

24b	gastro-resistant, modified or prolonged	None	1–5	Major
	release FPPs			amendment
				(MaA-PA)

- 1. Multipoint in vitro dissolution profiles of the proposed version of the product (determined in the routine release medium on at least two batches of pilot- or production-scale), are similar to the dissolution profiles of the biobatch.
- 2. Coating is not a critical factor for the release mechanism.
- 3. Specifications for the FPP are updated only with respect to weight and dimensions, if applicable.

- 1. Justification for not submitting a new bioequivalence study according to the current WHO guidelines on bioequivalence (Proposal to waive in vivo bioequivalence requirements for WHO Model List of essential medicines immediate-release, solid oral dosage forms, WHO Technical Report Series 937, 2006, Annex 8).
- 2. (P.2) Comparative multipoint in vitro dissolution profiles in the routine release medium (or media), on at least two batches of pilot- or production-scale of the proposed product versus the biobatch.
- 3. (P.5) Copies of revised FPP release and shelf-life specifications and certificates of analysis for a minimum of one pilot- or production-scale batch.
- 4. (P.8.1) Results of stability testing generated on at least one pilot- or production-scale batch with a minimum of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing.
- 5. (R.1) Copies of relevant sections of blank master production documents with changes highlighted as well as relevant pages of the executed production documents for one batch and confirmation that there are no changes to the production documents other than those highlighted.

Descr	iption of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
25	25 Change in the composition of an immediate-release solid oral dosage form including:			

25a.	replacement of a single excipient with	1–5	1–10	Minor
1	a comparable excipient at a similar			Amendment
	concentration			– Prior
				Approval
				(MiA – PA)
25a.		None	1–10	Major
2				amendment
				(MaA-PA)
25b.	quantitative changes in excipients	1–4	1–4, 7–10	Minor
1				Amendment
				– Prior
				Approval
				(MiA – PA)
25b.		None	1–4, 7–10	Major
2				amendment
				(MaA-PA)

- 1. No change in functional characteristics of the pharmaceutical form.
- 2. Only minor adjustments (see Appendix 2) are made to the quantitative composition of the FPP; any minor adjustment to the formulation to maintain the total weight is made using an excipient which currently makes up a major part of the FPP formulation.
- 3. Stability studies have been started under conditions according to ZAMRA guidelines on registration of medicines: quality part (with indication of batch numbers) and relevant stability parameters have been assessed in at least two pilot- or production-scale batches, satisfactory stability data covering at least 3 months are at the disposal of the applicant, and the stability profile is similar to that of the currently accepted product.
- 4. The dissolution profile of the proposed product determined on a minimum of two pilot-scale batches is similar to the dissolution profile of the biobatch.
- 5. The change is not the result of stability issues and/or does not result in potential safety concerns, i.e. differentiation between strengths.

- 1. Supporting clinical or comparative bioavailability data or justification for not submitting a new bioequivalence study according to the current ZAMRA guidelines on bioequivalence.
- 2. (P.1) Description and composition of the FPP.
- 3. (P.2) Discussion on the components of the proposed product (e.g. choice of excipients, compatibility of API and excipients), comparative multipoint in vitro dissolution profiles obtained on at least two batches of pilot- or production-scale of the proposed product and the biobatch (depending on the solubility and permeability of the drug, dissolution in the routine release medium or in multiple media covering the physiological pH range).
- 4. (P.3) Batch formula, description of manufacturing process and process controls, controls of critical steps and intermediates, process validation protocol and/or evaluation.
- 5. (P.4) Control of excipients, if new excipients are proposed.
- 6. (P.4.5) If applicable, either a CEP for any new component of animal origin susceptible to TSE risk or, where applicable, documented evidence that the specific source of the TSE risk material has been previously assessed by an NMRA in the ICH region or associated countries and shown to comply with the scope of the current guidelines in the countries of the ICH region or associated countries. The following information should be included for each such material: name of manufacturer, species and tissues from which the material is derived, country of origin of the source animals and its use.
- 7. (P.5) Copies of FPP release and shelf-life specifications and certificates of analysis for a minimum of two pilot- or production-scale batches. If applicable, data to demonstrate that the new excipient does not interfere with the analytical procedures for the FPP.
- 8. (P.8.1) Results of stability testing generated on at least two pilot- or production-scale batches with a minimum of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing.

 9. (P.8.2) Updated post-acceptance stability protocol and stability commitment to place the first production-scale batch of each strength of the proposed product into the long-term stability programme (bracketing and matrixing for multiple strengths and packaging components could be applied, if scientifically justified).
- 10. (R.1) Copies of relevant sections of blank master production documents with changes highlighted as well as relevant pages of the executed production documents for one batch, and confirmation that there are no changes to the production documents other than those highlighted.

Descr	iption of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
26	Change or addition of imprints, embossis	ng or other markii	ngs, including repla	cement or
	addition of inks used for product markin	gs and change in s	scoring configuration	on involving:

26a	changes in imprints, embossing or	1–3	1–2, 5–6	Minor
	other markings			Amendment
				– Prior
				Approval
				(MiA – PA)
26b	deletion of a scoreline	2–5	1, 5–6	Minor
				Amendment
				_
				Notification
				(MiA – N)
26c.	addition of a scoreline	2–4	1, 3, 5–6	Minor
1				Amendment
				– Prior
				Approval
				(MiA – PA)
26c.		None	1, 3–6	Major
2				amendment
				(MaA-PA)

- 1. Any ink complies with section 3.2.P.4 of the ZAMRA guidelines for submission of applications for registration of medicines: quality part.
- 2. The change does not affect the stability or performance characteristics (e.g. release rate) of the FPP.
- 3. Changes to the FPP specifications are those necessitated only by the change to the appearance or to the scoring.
- 4. Addition or deletion of a score line from a generic product is consistent with a similar change in the comparator product or was requested by ZAMRA.
- 5. The scoring is not intended to divide the FPP into equal doses.

- 1. Sample of the FPP.
- 2. (P.1.) Qualitative composition of the ink, if purchased as a mixture.
- 3. (P.2) Demonstration of the uniformity of the dosage units of the tablet portions, where the scoring is intended to divide the FPP into equal doses.
- 4. (P.2) Demonstration of the similarity of the release rate of the tablet portions for gastroresistant, modified or prolonged release products.
- 5. (P.5) Copies of revised FPP release and shelf-life specifications.
- 6. (R.1) Copies of relevant sections of blank master production documents with changes highlighted as well as relevant pages of the executed production documentation for one batch and confirmation that there are no changes to the production documents other than those highlighted.

Descr	Description of change		Documentation	Reporting
		to be	required	type
		fulfilled		
27	Change in dimensions without change in qu	alitative or qua	antitative compositi	on and mean
	mass of:			
27a	tablets, capsules, suppositories and	1–2	2–6	Minor
	pessaries other than those stated in change			Amendment
	no. 27b			– Prior
				Approval
				(MiA – PA)
27b	gastro-resistant, modified or prolonged-	1–2	1–6	Minor
	release FPPs and scored tablets			Amendment
				– Prior
				Approval
				(MiA – PA)

- 1. Specifications for the FPP are updated only with respect to dimensions of the FPP.
- 2. Multipoint in vitro dissolution profiles of the current and proposed versions of the product (determined in the routine release medium, on at least one batch of pilot- or production-scale), are comparable.

Documentation required

- 1. For gastro-resistant, modified or prolonged release FPPs, justification for not submitting a new bioequivalence study according to the current ZAMRA guidelines on bioequivalence. For scored tablets where the scoring is intended to divide the FPP into equal doses, demonstration of the uniformity of the tablet portions.
- 2. Sample of the FPP.
- 3. (P.2) Discussion on the differences in manufacturing process(es) between the currently accepted and proposed products and the potential impact on product performance.
- 4. (P.2) Comparative multipoint in vitro dissolution profiles in the routine release medium, on at least one batch of pilot- or production-scale of the current and proposed products.
- 5. (P.5) Copies of revised FPP release and shelf-life specifications.
- 6. (R.1) Copies of relevant sections of blank master production documents with changes highlighted as well as relevant pages of executed production documentation for one batch and confirmation that there are no changes to the production documents other than those highlighted.

3.2. P.3 MANUFACTURE

Descr	ription of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
28	Addition or replacement of a manufacturing	g site for part o	r all of the manufac	turing process
	for an FPP involving:			
28a	secondary packaging of all types of FPPs	2–3	1	Minor
				Amendment
				- Notification
				(MiA – N)
28b	primary packaging site of:			
28b.	solid FPPs (e.g. tablets, capsules), semi-	2–4	1, 8	Minor
1	solid FPPs (e.g. ointments, creams) and			Amendment
	solution liquid FPPs			- Notification
				(MiA – N)

28b.	other liquid FPPs (suspensions,	2–5	1, 5, 8	Minor
2	emulsions)			Amendment
				- Notification
				(MiA – N)
28c	all other manufacturing operations except	1–3, 5	1–9	Minor
	batch control and/or release testing			Amendment
				– Prior
				Approval
				(MiA – PA)

- 1. No change in the batch formula, description of manufacturing process and process controls, equipment class and process controls, controls of critical steps and intermediates, or FPP specifications.
- 2. Satisfactory inspection in the last three years either by WHO or an SRA.
- 3. Site appropriately authorized by an NMRA (to manufacture the pharmaceutical form and the product concerned).
- 4. The change does not concern a sterile FPP.
- 5. Validation protocol is available or validation of the manufacturing process at the new site has been successfully carried out on at least three production-scale batches in accordance with the current protocol.

- 1. Evidence that the proposed site has been appropriately authorized in the last three years, for the pharmaceutical form and the product concerned:
 - a copy of the current manufacturing authorization, a GMP certificate or equivalent document issued by the NMRA;
 - a GMP statement or equivalent issued by WHO or an SRA;
 - date of the last satisfactory inspection concerning the packaging facilities by WHO or an SRA in the last three years.
- 2. Date and scope (with indication as to whether scope was e.g. product-specific or related to a specific pharmaceutical form) of the last satisfactory inspection.
- 3. (P.2) Where applicable, for semisolid and liquid formulations in which the API is present in non-dissolved form, appropriate validation data including microscopic imaging of particle size distribution and morphology.
- 4. (P.2) For solid dosage forms, data on comparative dissolution tests in the routine release medium, with demonstration of similarity of dissolution profiles with those of the biobatch, performed on one production-scale batch each from current and proposed manufacturing sites and comparison with the biobatch results, with commitment to generate dissolution profiles on two more production-scale batches.
- 5. (P.3.5) Process validation reports or validation protocol (scheme) for three batches of the proposed batch size, which includes comparative dissolution against the biobatch results with f2 calculation as necessary.
- 6. (P.5.1) Copies of release and shelf-life specifications.
- 7. (P.5.4) Batch analysis data on one production-scale batch from the proposed site and comparative data on the last three batches from the previous site.
- 8. (P.8.2) Updated post-acceptance stability protocol and stability commitment to place the first production-scale batch of the FPP produced at the new site into the long-term stability programme (bracketing and matrixing for multiple strengths and packaging components could be applied, if scientifically justified).
- 9. (R.1) Executed production documents for one batch of the FPP manufactured at the new site.

Descr	ription of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
29	Replacement or addition of a site	1–2	1–3	Minor
	involving batch control testing			Amendment
				– Prior
				Approval
				(MiA – PA)

- 1. Site is appropriately authorized by the NMRA and satisfactorily inspected either by WHO or an SRA.
- 2. Transfer of methods from the current testing site to the proposed testing site has been successfully completed.

- 1. Clear identification of the currently accepted and proposed quality control sites on the letter accompanying the application.
- 2. Documented evidence that the site is appropriately authorized by the NMRA and satisfactorily inspected either by WHO or an SRA.
- 3. (P.5.3) Documented evidence of successful transfer of analytical procedures from the current to the proposed site.

Descr	ription of change	Conditions to be fulfilled	Documentation required	Reporting type
30	Change in the batch size of the FPP invol-	ving:		
30a	up to and including a factor of 10 compared to the biobatch	1–7	2, 5–6	Minor Amendment - Prior Approval (MiA – PA)

30b	downscaling	1–5	2, 6	Minor
				Amendment
				_
				Notification
				(MiA – N)
30c	other situations	1–7	1–7	Minor
				Amendment
				– Prior
				Approval
				(MiA – PA)

- 1. The change does not affect the reproducibility and/or consistency of the product.
- 2. The change pertains only to immediate-release oral pharmaceutical forms and to non-sterile liquid forms.
- 3. Changes to the manufacturing method and/or to the in-process controls are only those necessitated by the change in batch size, e.g. use of different-sized equipment.
- 4. A validation protocol is available or validation of the manufacture of three production-scale batches has been successfully undertaken in accordance with the current validation protocol.
- 5. The change is not necessitated by unexpected events arising during manufacture or because of stability concerns.
- 6. The change does not require supporting in vivo data.
- 7. The biobatch size was at least 100 000 units in the case of solid oral dosage forms.

- 1. (P.2) For solid dosage forms: dissolution profile data, in the routine release medium, on a minimum of one representative production-scale batch and comparison of the data with the biobatch results and one production-scale batch of the previous batch size. Data on the next two full production-scale batches should be available on request and should be reported if they do not meet dissolution profile similarity (f2) requirements. For semi-solid dosage forms (e.g. lotions, gels, creams and ointments), containing the API in the dissolved or non-dissolved form, comparative in vitro data on membrane diffusion (membrane release testing) should be submitted or be available on request.
- 2. (P.3.5) Process validation reports for three batches of the proposed batch size or validation protocol (scheme).
- 3. (P.5.1) Copies of release and shelf-life specifications.
- 4. (P.5.4) Batch analysis data (in a comparative tabular format) on a minimum of one production-scale batch manufactured to both the currently accepted and the proposed batch sizes. Batch data on the next two full production-scale batches should be available on request and should be reported immediately by the supplier of the product, if outside specifications (with proposed remedial action).
- 5. (P.8.2) Updated post-acceptance stability protocol (approved by authorized personnel) and stability commitment to place the first production-scale batch of each strength at the proposed scale into the long-term stability programme (bracketing and matrixing for multiple strengths and packaging components could be applied, if scientifically justified).
- 6. (R.1) Copies of relevant sections of blank master production documents with changes highlighted as well as relevant pages of the executed production documentation for one batch (if manufactured as required by documentation 4) (above) and confirmation that there are no changes to the production documents other than those highlighted.
- 7. Supporting clinical or comparative bioavailability data or justification for not submitting a new bioequivalence study according to the current ZAMRA guidelines on bioequivalence.

Description of change	Conditions	Documentation	Reporting
	to be	required	type
	fulfilled		

31a	Change in the manufacturing process of	1–9	1–4, 6–7	Minor
	the FPP			Amendment
				– Prior
				Approval
				(MiA – PA
31b		1-3, 5-9	1–7	Major
				amendment
				(MaA-PA)

- 1. The change does not require supporting in vivo data.
- 2. No change in qualitative and quantitative impurity profile or in physicochemical properties; dissolution profiles are similar to those of the biobatch.
- 3. The manufacturing processes for the currently accepted and proposed products use the same principles (e.g. a change from wet to dry granulation, from direct compression to wet or dry granulation or vice versa would be considered a change in manufacturing principle), the same processing intermediates and there are no changes to any manufacturing solvent used in the process.
- 4. The same classes of equipment, operating procedures, in-process controls (with no widening or deleting of limits) are used for the currently accepted and proposed products; no change in critical process parameters.
- 5. No change in the specifications of the intermediates or the FPP.
- 6. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 7. The change does not involve packaging or labelling where the primary packaging provides a metering and/or delivery function.
- 8. The change does not concern a gastro-resistant, modified or prolonged-release FPP.
- 9. The change does not affect the sterilization parameters of a sterile FPP.

- 1. Supporting clinical or comparative bioavailability data or justification for not submitting a new bioequivalence study according to the current ZAMRA guidelines on bioequivalence.
- 2. (P.2) Discussion on the development of the manufacturing process; where applicable:
 - comparative in vitro testing, e.g. multipoint dissolution profiles in the routine release
 medium for solid dosage units (one production batch and comparative data on one batch
 from the previous process and the biobatch results; data on the next two production
 batches should be available on request or reported if outside specification);
 - comparative in vitro membrane diffusion (membrane release testing) for non-sterile semisolid dosage forms containing the API in the dissolved or non-dissolved form (one production batch and comparative data on one batch from the previous process and the biobatch results; data on the next two production batches should be submitted or be available on request);
 - microscopic imaging of particles to check for visible changes in morphology and comparative size distribution data for liquid products in which the API is present in nondissolved form.
- 3. (P.3) Batch formula, description of manufacturing process and process controls, controls of critical steps and intermediates, process validation protocol and/or evaluation.
- 4. (P.5) Specification(s) and certificate of analysis for one production-scale batch manufactured according to the currently accepted process and for a batch manufactured according to the proposed process.
- 5. (P.8.1) Results of stability testing generated on at least two pilot batches (for uncomplicated products, one pilot batch; the other one can be smaller) with a minimum of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing.
- 6. (P.8.2) Updated post-acceptance stability protocol and stability commitment to place the first production-scale batch of the proposed product into the long-term stability programme.
- 7. (R.1) Copies of relevant sections of blank master production documents with changes highlighted as well as executed production documentation for one batch and confirmation that there are no changes to the currently accepted production documents other than those highlighted.

Descr	ription of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
32	Change to in-process tests or limits appli	ied during the mar	nufacture of the FP	Por
	intermediate involving:			
32a	tightening of in-process limits	1–2, 5	1	Minor
32b	deletion of a test	2, 4	1, 6	Amendment
32c	addition of new tests and limits	2–3	1–6	– Prior
32d	revision or replacement of a test	2–3	1–6	Approval
				(MiA – PA)

- 1. The change is within the range of acceptance limits.
- 2. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 3. Any new test does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 4. The deleted test has been demonstrated to be redundant with respect to the remaining analytical procedures (e.g. colour) and does not affect the critical quality attributes of the product (e.g. blend uniformity, weight amendment).
- 5. No change in the analytical procedure.

- 1. (P.5.1) Copy of the proposed in-process specifications dated and signed by authorized personnel and a comparative table of currently accepted and proposed specifications.
- 2. (P.5.2) Copies or summaries of analytical procedures, if new analytical procedures are used.
- 3. (P.5.3) Copies or summaries of validation reports, if new analytical procedures are used.
- 4. (P.5.3) Where an in-house analytical procedure is used and a pharmacopoeial standard is claimed, results of an equivalence study between the in-house and pharmacopoeial methods.
- 5. (P.5.4) Description of the batches, certificates of analysis for at least one batch (minimum pilot-scale) and comparative summary of results, in tabular format, for one batch using current and proposed methods, if new analytical procedures are implemented.
- 6. (P.5.6) Justification for the addition or deletion of the tests and limits.

3.2. P.4 Control of excipients

Descr	Description of change		Documentation	Reporting
		to be	required	type
		fulfilled		
33	Change in source of an excipient from a	1	1	Minor
	TSE risk to a material of vegetable or			Amendment
	synthetic origin.			Notification
				(MiA – N)

Conditions to be fulfilled

1. No change in the excipient and FPP release and shelf-life specifications.

Documentation required

1. Declaration from the manufacturer of the excipient that it is entirely of vegetable or synthetic origin.

Desc	ription of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
34	Change in the specifications or analytic	cal procedures for a	n excipient involvi	ng:
34a	deletion of a non-significant in-house parameter	2	1–3	Minor Amendment
34b	addition of a new test parameter or analytical procedure	2–3	1–2	– Prior Approval
34c	tightening of specification limits	1–2, 4	1–2	(MiA – PA)
34d	change or replacement of an analytical procedure	2–3	1–2	
Cond	litions to be fulfilled	•	•	

- 1. The change is within the range of currently accepted limits.
- 2. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 3. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 4. No change in the analytical procedure.

Documentation required

- 1. Justification for the change.
- 2. (P.5) Comparative table of currently accepted and proposed specifications, justification of the proposed specifications and details of procedure and summary of validation of any new analytical procedure (if applicable).
- 3. Justification to demonstrate that the parameter is not critical.

Description of change		Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
35	Change in specifications of an excipient	1	1	Minor
	to comply with an officially recognized			Amendment
	pharmacopoeia			- Notification
				(MiA – N)

Conditions to be fulfilled

1. No change to the specifications other than those required to comply with the pharmacopoeia (e.g. no change in particle size distribution).

Documentation required

1. Comparative table of currently accepted and proposed specifications for the excipient.

3.2. P.5 CONTROL OF FPP

Descr	ription of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
36a	Change in the standard claimed for the	1–3	1–5	Minor
	FPP from an in-house to an officially			Amendment
	recognized pharmacopoeial standard			– Prior
36b	Update to the specifications to comply	None	1, 3, 5	Approval
	with an officially recognized			(MiA – PA)
	pharmacopoeial monograph as a result			
	of an update to this monograph to which			
	the FPP is controlled			

Conditions to be fulfilled

- 1. The change is made exclusively to comply with the officially recognized pharmacopoeia.
- 2. No change to the specifications that results in a potential impact on the performance of the FPP (e.g. dissolution test).
- 3. No deletion of or relaxation of any of the tests, analytical procedures or acceptance criteria of the specifications. Any deletion or relaxation of the tests should meet the conditions of 37a or 37d and should follow the corresponding reporting types.

- 1. (P.5.1) Copy of the proposed FPP specifications dated and signed by authorized personnel and a comparative table of currently accepted and proposed specifications.
- 2. (P.5.3) Where an in-house analytical procedure is used and a pharmacopoeial standard is claimed, results of an equivalence study between the in-house and pharmacopoeial methods.
- 3. (P.5.4) Description of the batches, certificates of analysis for at least one batch (minimum pilot-scale) and comparative summary of results, in tabular format, for one batch using current and proposed procedures, if new analytical procedures are implemented.
- 4. (P.5.6) Justification for the proposed FPP specifications.
- 5. (P.5.3) Demonstration of the suitability of the monograph to control the FPP.

Desci	ription of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
37	Change in the specifications of the FPP i	nvolving test pa	rameters and accep	tance criteria:
37a	deletion of a test parameter	5	1, 6	Minor Amendment
37b	addition of a test parameter	2–4, 7	1–6	– Prior
37c	tightening of an acceptance criterion	1–2	1, 6	Approval (MiA – PA)
37d	relaxation of an acceptance criterion	2, 4, 6–7	1, 5–6	(141111 171)
37e	replacement of a test parameter	2–4, 6-7	1–6	

- 1. The change is within the range of currently accepted limits.
- 2. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 3. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 4. No additional impurity found over the ICH identification threshold.
- 5. The deleted test has been demonstrated to be redundant with respect to the remaining tests.
- 6. The change to the specifications does not affect the stability and the performance of the product.
- 7. The change does not concern sterility testing.

- 1. (P.5.1) Copy of the proposed FPP specifications dated and signed by authorized personnel and a comparative table of currently accepted and proposed specifications.
- 2. (P.5.2) Copies or summaries of analytical procedures, if new analytical procedures are used.
- 3. (P.5.3) Copies or summaries of validation reports, if new analytical procedures are used.
- 4. (P.5.3) Where an in-house analytical procedure is used and a pharmacopoeial standard is claimed, results of an equivalence study between the in-house and pharmacopoeial methods.
- 5. (P.5.4) Description of the batches, certificates of analysis for at least one batch (minimum pilot-scale) and comparative summary of results, in tabular format, for one batch using currently accepted and proposed procedures, if new analytical procedures are implemented.
- 6. (P.5.6) Justification for the proposed FPP specifications.

Desci	ription of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
38	Change in the analytical procedures for	the FPP involvin	g:	
38a	deletion of an analytical procedure	5	1, 6	Minor
38b	addition of an analytical procedure	3–4, 6–7	1–5	Amendment – Prior
38c.	modification or replacement of an	1–4, 6–7	1–5	Approval
1	analytical procedure			(MiA – PA)
38c.		2–4, 6–7	1–5	
2				
38d	updating the analytical procedure	None	1–5	
	with an officially recognized			
	pharmacopoeial monograph as a			
	result of an update to that monograph			

38e	change from an in-house analytical	2, 7	1–3, 5	
	procedure to an analytical procedure			
	in an officially recognized			
	pharmacopoeial monograph or from			
	the analytical procedure in one			
	officially recognized pharmacopoeial			
	monograph to an analytical procedure			
	in another officially recognized			
	pharmacopoeial monograph			

- 1. The method of analysis is based on the same analytical technique or principle (e.g. changes to the analytical procedure are within allowable adjustments to column length and other parameters, but do not include amendments beyond the acceptable ranges or a different type of column and method), and no new impurities are detected.
- 2. Comparative studies demonstrate that the proposed analytical procedure is at least equivalent to the currently accepted analytical procedure.
- 3. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 4. The change does not concern sterility testing.
- 5. The deleted analytical procedure is an alternative method and is equivalent to a currently accepted analytical procedure.
- 6. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 7. No new impurities have been detected.

- 1. (P.5.1) A copy of the proposed FPP specifications dated and signed by authorized personnel and a comparative table of currently accepted and proposed specifications.
- 2. (P.5.2) Copies or summaries of analytical procedures, if new analytical procedures are used.
- 3. (P.5.3) Copies or summaries of validation reports, including verification data for assay or purity methods, if new analytical procedures are used.
- 4. (P.5.3) Where an in-house analytical procedure is used and a pharmacopoeial standard is claimed, results of an equivalence study between the in-house and pharmacopoeial methods.
- 5. (P.5.4) Description of the batches, certificates of analysis for at least one batch (minimum pilot-scale) and comparative summary of results, in tabular format, for one batch using currently accepted and proposed analytical procedures.
- 6. Justification for the deletion of the analytical procedure, with supporting data.

3.2. P.7 CONTAINER-CLOSURE SYSTEM

Descr	ription of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
39a	Replacement or addition of a primary packaging type	1	1–2, 4–6	Minor Amendment - Prior Approval (MiA - PA)
39b		None	1–6	Major amendment (MaA-PA) MaA-P

Conditions to be fulfilled

1. The change does not concern a sterile FPP.

- 1. Samples of the product as packaged in the new container-closure system.
- 2. (P.2) Data on the suitability of the container-closure system (e.g. extractable/leachable testing, permeation testing, light transmission) demonstrating equivalent or superior protection compared to the current packaging system. For changes to functional packaging, data to demonstrate the functioning of the new packaging.
- 3. (P.3.5) For sterile FPPs, process validation and/or evaluation studies.
- 4. (P.7) Information on the proposed primary packaging type (e.g. description, materials of construction of primary packaging components, specifications, and results of transportation studies, if appropriate).
- 5. (P.8.1) Stability summary and conclusions, results for a minimum of two batches of pilot- or production-scale, of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing and where applicable, results of photostability studies.
- 6. (P.8.2) Updated post-acceptance stability protocol and stability commitment to place the first production-scale batch of the proposed product into the long-term stability programme, unless data were provided in documentation 5.

Descrip	otion of change	Conditions	Documentation	Reporting
		to be	required	type
		fulfilled		
40	Change in the package size involving:			
40a	change in the number of units (e.g.	1–2	1–2	Minor
	tablets, ampoules, etc.) in a package			Amendment
				_
				Notification
				(MiA - N)
40b.1	change in the fill weight or fill volume	1–3	1–2	Minor

40b.2	of non-parenteral multidose products	1–2	1–2	Amendment
				– Prior
				Approval
				(MiA – PA)

- 1. The change is consistent with the posology and treatment duration accepted in the SmPC.
- 2. No change in the primary packaging material.
- 3. No increase in the headspace or surface/volume ratio.

- 1. Justification for the new pack-size, indicating that the new size is consistent with the dosage regimen and duration of use as accepted in the SmPC.
- 2. (P.8.2) A written commitment that stability studies will be conducted in accordance with the ZAMRA guidelines for products where stability parameters could be affected.

Desci	ription of change	Conditions to be	Documentation	Reporting
		fulfilled	required	type
41	Change in the shape or dimensions	of the container or clo	osure for:	
41a	non-sterile FPPs	1–2	1–3	Minor
				Amendment
				- Notification
				(MiA - N)

41b	sterile FPPs	1–2	1–4	Minor
				Amendment
				– Prior
				Approval
				(MiA – PA)

- 1. No change in the qualitative or quantitative composition of the container and/or closure.
- 2. The change does not concern a fundamental part of the packaging material, which could affect the delivery, use, safety or stability of the FPP.

- 1. Samples of the product packaged in the new container-closure system.
- 2. (P.7) Information on the proposed container-closure system (e.g. description, materials of construction, and specifications).
- 3. (P.8.1) In the case of changes to the thickness of a packaging component or for sterile FPPs: stability summary and conclusions, results for a minimum of two batches of pilot- or production-scale, of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing and, where applicable, results of photostability studies. In the case of a change in the headspace or a change in the surface/volume ratio for non-sterile FPPs, a commitment for the above studies.
- 4. (P.3.5) Evidence of revalidation studies in the case of terminally sterilized products. The batch numbers of the batches used in the revalidation studies should be indicated, where applicable.

Descr	iption of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
42	Change in qualitative and/or quantitative	composition of the	he immediate packa	ging material
	for:			

42a	solid FPPs	1–3	1–3	Minor
				Amendment
				_
				Notification
				(MiA – N)
42b	semisolid and liquid FPPs	1–3	1–3	Minor
				Amendment
				– Prior
				Approval
				(MiA – PA)

- 1. The change does not concern a sterile FPP.
- 2. No change in the packaging type and material (an example of an allowable change is blister to blister).
- 3. The relevant properties of the proposed packaging are at least equivalent to those of the currently accepted material.

- 1. (P.2) Data demonstrating the suitability of the proposed packaging material (e.g. extractable/leachable testing, light transmission, permeation testing for oxygen, carbon dioxide, and moisture).
- 2. (P.7) Information on the proposed packaging material (e.g. description, materials of construction, and specifications).
- 3. (P.8.1) Stability summary and conclusions, results of (or a commitment to study in the case of demonstrated equivalent or more protective packaging) a minimum of two batches of pilot- or production-scale, of 3 months of accelerated (and intermediate, as appropriate) and 3 months of long-term testing and, where applicable, results of photostability studies.

Descr	iption of change	Conditions to be	Documentation	Reporting
		fulfilled	required	type
Change in the specifications of the immediate packaging involving:				

43a	tightening of specification limits	1–2	1	Minor
43b	addition of a test parameter	2–3	1–2	Amendment
43c	deletion of a non-critical parameter	2	1, 3	– Prior
				Approval
				(MiA – PA)

- 1. The change is within the range of currently accepted limits.
- 2. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.
- 3. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.

- 1. (P.7) Comparative table of currently accepted and proposed specifications, justification of the proposed specifications.
- 2. (P.7) Description of the analytical procedure and summary of validation of the new analytical procedure.
- 3. Documentation to demonstrate that the parameter is not critical.

Desc	ription of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
44	Change to an analytical procedure on t	he immediate pac	kaging involving:	
44a	minor change to an analytical	1–3	1	Minor
	procedure			Amendment
44b	other changes to an analytical	2–4	1	– Prior
	procedure including addition or			Approval
	replacement of an analytical			(MiA – PA)
	procedure			
44c	deletion of an analytical procedure	5	2	
Cond	litions to be fulfilled	•		1

- 1. The method of analysis is based on the same analytical technique or principle (e.g. changes to the analytical procedure are within allowable adjustments to column length and other parameters, but do not include amendments beyond the acceptable ranges or a different type of column and method).
- 2. Appropriate (re)validation studies have been performed in accordance with the relevant guidelines.
- 3. Comparative studies indicate the new analytical procedure to be at least equivalent to the former procedure.
- 4. Any new analytical procedure does not concern a novel, non-standard technique or a standard technique used in a novel way.
- 5. The deleted analytical procedure is an alternative method and is equivalent to a currently accepted method.

Documentation required

- 1. (P.7) Description of the method and comparative validation results demonstrating that the currently accepted and proposed methods are at least equivalent.
- 2. Documentation to demonstrate the equivalence of the deleted method and a currently accepted method.

Desc	ription of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
45	Change in any part of the (primary)	1	1–2	Minor
	packaging material not in contact			Amendment
	with the FPP formulation (e.g. colour			_
	of flip-off caps, colour code rings on			Notification
	ampoules, or change of needle			(MiA - N)
	shield).			

Conditions to be fulfilled

1. The change does not concern a fundamental part of the packaging material, which affects the delivery, use, safety or stability of the FPP.

- 1. (P.7) Information on the proposed packaging material (e.g. description, materials of construction, and specifications).
- 2. Sample of the FPP.

Descr	iption of change	Conditions to	Documentation	Reporting
		be fulfilled	required	type
46	Change to an administration or measuring	g device that is no	ot an integral part of	f the primary
	packaging (excluding spacer devices for	metered dose inha	alers) involving:	
46a	addition or replacement	1, 2	1–2	Minor
46b	deletion	3	3	Amendment
				_
				Notification
				(MiA - N)

- 1. The proposed measuring device is designed to accurately deliver the required dose for the product concerned in line with the posology, and results of such studies are available.
- 2. The proposed device is compatible with the FPP.
- 3. The FPP can be accurately delivered in the absence of the device.

Documentation required

- 1. (P.2) Data to demonstrate accuracy, precision and compatibility of the device.
- 2. Sample of the device.
- 3. Justification for the deletion of the device.

3.2. P.8 STABILITY

		be fulfilled	required	type
47	Change in the shelf-life of the FPP (as packaged for sale) involving:			
47a	reduction	3	1–3	Minor
				Amendment
				– Prior
				Approval
				(MiA - PA)
47b	extension	1–2	1–3	Major
				amendment
				(MaA-PA)

- 1. No change to the primary packaging type in direct contact with the FPP and to the recommended conditions of storage.
- 2. Stability data were generated in accordance with the currently accepted stability protocol.
- 3. The change is not necessitated by unexpected events arising during manufacture or because of stability concerns.

- 1. (P.5.1) Copy of the currently accepted shelf-life specifications.
- 2. (P 8.1) Proposed shelf-life, summary of long-term stability testing according to currently accepted protocol and test results for a minimum of two pilot- or production-scale batches for a period sufficient to support the proposed shelf-life.
- 3. (P.8.2) Updated post-acceptance stability protocol and stability commitment and justification of change.

Description of change	Conditions to be	Documentation	Reporting
	fulfilled	required	type

48	Change in the in-use period of the FPP (after first opening or after reconstitution or			
	dilution):			
48a	reduction	1	1	Minor
				Amendment
				– Prior
				Approval
				(MiA – PA)
48b	extension	None	1–2	Major
				amen
				dmen
				t
				(MaA
				-PA)

1. The change is not necessitated by unexpected events arising during manufacture or because of stability concerns.

- 1. (P 8) Proposed in-use period, test results and justification of change.
- 2. (P 5.1) Copy of currently accepted end of shelf-life FPP specifications and, where applicable, specifications after dilution or reconstitution.

Description of change	Conditions to	Documentation	Reporting
	be fulfilled	required	type

49	Change in the labelled storage	1	1–2	Minor
	conditions of the FPP (as packaged for			Amendment
	sale), the product during the in-use			– Prior
	period or the product after			Approval
	reconstitution or dilution			(MiA – PA)

1. The change is not necessitated by failure to meet specifications resulting from unexpected events arising during manufacture, or because of stability concerns.

- 1. (P.8.1) If applicable, stability and/or compatibility test results to support the change to the storage conditions.
- 2. (P.8.2) Updated post-acceptance stability protocol and stability commitment and justification of change.

APPENDIX 1

EXAMPLES OF CHANGES THAT MAKE A NEW APPLICATION OR EXTENSION APPLICATION NECESSARY

Description of change	Conditions to	Documentation	Reporting
	be fulfilled	required	type
1. Change of the API to a different API	None	1	New
2. Inclusion of an additional API in a			application/
multicomponent product			extension
3. Removal of one API from a			application
multicomponent product			
4. Change in the dose and/or strength of one			
or more APIs			
5. Change from an immediate-release product			
to an extended or delayed-release dosage form			
or vice versa			
6. Change from a liquid to a powder for			
reconstitution or vice versa			
7. Changes in the route of administration			

Conditions to be fulfilled

None

Documentation required

1. Documents in fulfilment of the requirements outlined in the ZAMRA *Guidelines on submission of application for registration of medicines: quality part.*

APPENDIX 2

CHANGES TO EXCIPIENTS

Excipient	Percentage excipient (w/w out of total target dosage	
	form core weight	
Filler	± 5.0	
Disintegrant		
• starch	± 3.0	
• other	± 1.0	
Binder	± 0.5	
Lubricant		
	. 0.25	
 Ca or Mg Stearate 	± 0.25	
• other	± 1.0	
Glidant		
• talc	± 1.0	
• other	± 0.1	

• These percentages are based on the assumption that the active pharmaceutical ingredient (API) in the finished pharmaceutical product (FPP) is formulated to 100.0% of label/potency declaration. The total additive effect of all changes to excipients should be not more than 5.0% relative to the target dosage form weight (e.g. in a product consisting of API, lactose, microcrystalline cellulose and magnesium stearate, the lactose increases by 2.5% and microcrystalline cellulose decreases by 2.5%).

• If an excipient serves multiple functions (e.g. microcrystalline cellulose as a filler and as a disintegrant), then the most conservative recommended range should be applied (e.g. ± 1.0% for microcrystalline cellulose should be applied in this example). If a wider range is proposed, scientific justification and supporting data should be provided to demonstrate that the wider range will not affect the other function of the excipient.