GUIDELINE FOR POST REGISTRATION AMENDMENTS/ VARIATIONS TO APPROVED REGISTRATION DOSSIERS (VERSION 1.0)

NAMIBIA MEDICINES REGULATORY COUNCIL

MINISTRY OF HEALTH AND SOCIAL SERVICES

POST REGISTRATION AMENDMENTS/ VARIATIONS TO REGISTERED MEDICINES

NAMIBIA GUIDELINE FOR SUBMISSION OF APPLICATIONS FOR POST REGISTRATION AMENDEMENT/ VARIATION TO APPROVED REGISTRATION DOSSIERS OF PHARMACEUTICALS FOR HUMAN USE

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Process and adoption of the guideline:

Activity	Date
Drafting of guideline	10 January 2021
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2nd round of stakeholders comments	12 November 2021
Approval of the final draft by the NMRC	10 March 2022
Implementation	10 March 2022

Abbreviations and Acronyms

API	Active Pharmaceutical Ingredient
APIMF	Active Pharmaceutical Ingredient Master File
AN	Annual Notification
IN	Immediate Notification
CEP	Certificate of Suitability to the monograph of European Pharmacopeia
CTD	Common Technical Document
EDQM	European Directorate for the Quality of Medicines and Healthcare
EU	European Union
FPP	Finished Pharmaceutical Product
GMP	Good Manufacturing Practice
ICH	International Council on Harmonisation for Technical Requirements of Pharmaceuticals for Human Use
MAH	Marketing Authorisation Holder
NMRC	Namibia Medicines Regulatory Council
PASS	Post-Authorisation Safety Studies
PBRER	Periodic Benefit-Risk Evaluation Report
PI	Package Insert/Professional Information
PIL	Patient Information Leaflet
PSUR	Periodic Safety Update Report
RMP	Risk Management Plan
SRA	Stringent Regulatory Authority
SmPC	Summary of Product Characteristics
USRN	Urgent Safety Restriction Notification

Foreword

This is the first edition of a comprehensive variation guideline adapted from SADC Variations guideline, World Health Organisation (WHO) Variations for prequalified Medicinal Products and European Union (EU) Guideline on Variations for Registered Medicinal Products. These guidelines were developed and formatted based on the Common Technical Document (CTD) requirements.

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 NMRC with adequate time for assessment of the supporting documentation. Particular circumstances are identified where lower reporting requirements (Annual Notification, Immediate Notification or Minor Variation) are possible. The change categories are organized according to the structure of the CTD. Specific CTD sections have been identified for individual data requirements in order to assist in the filing of documentation.

It should be noted that these guidelines are applicable only to APIs and excipients manufactured by chemical synthesis, classical fermentation, or semi-synthetic processes and FPPs containing such APIs and excipients. It is further elaborated that minor changes denoted by a letter 'IN' are considered as "Immediate Notifications" and 'AN' as "Annual Notification". Such notifications do not require prior approval but must be notified to NMRC immediately after implementation (immediate notification), or within 12 months following implementation for annual notifications. Response to Immediate Notifications will be communicated within 60 days of receipt of the application. Refer to *Appendix 3* for NMRC timelines for variations. Note that days in this document refers to calendar days unless otherwise stated.

Submission of documentation in accordance with the requirements of each type of change will significantly facilitate both assessment and approval process. It is therefore critical that the guidelines are construed, comprehended and followed by all Marketing Authorization Holders who intend to make changes to their registered finished pharmaceutical products (FPPs).

1.0 Introduction

A Marketing Authorization Holder (MAH) is responsible for the registered FPP throughout its life-cycle, irrespective of the regular reviews by the NMRC. It is acknowledged that technical and scientific progress may necessitate changes to the registered product over time. Any changes to a registered FPP (variations), whether administrative or substantial, are subject to approval by NMRC. Henceforth, guidance for the implementation of the different types of variations is set out in this document to facilitate the task of both MAHs and NMRC to guarantee that variations to the FPP do not compromise the quality, safety and efficacy of the registered product.

The NMRC Variation Guideline is an administrative instrument and as such, allows for flexibility in approach. Alternate approaches to the principles and practices described in this document may be acceptable provided they are supported by adequate justification. These approaches should be discussed in advance with NMRC.

In addition, it must be noted that NMRC reserves the right to request information or material, or define conditions not specifically described in this guideline, in order to allow for adequate assessment of safety, efficacy or quality of the pharmaceutical product.

2.0 Scope

These guidelines apply to applicants intending to make changes to a registered pharmaceutical product and related Active Pharmaceutical Ingredient (API). This guideline should be read in conjunction with the Medicines and Related Substances Control Act, 2003 (Act 13 of 2003) and the regulations and other applicable guidelines, including the *Namibia Guideline for Submission of Applications for Registration of Pharmaceuticals for Human Use in Common Technical Document format* and *SADC Guidance on Submission of Application for Registration in Common Technical Document format: Quality*.

This guidance document is applicable only to APIs and excipients manufactured by chemical synthesis, classical fermentation, or semi-synthetic processes and FPPs containing such APIs and excipients.

These guidelines pertain to the submission of applications for post registration amendments to approved registration dossiers of small molecule pharmaceuticals for human use. However,

they may be applied to a certain extent to submissions for biological as well as products for veterinary use. MAHs can consult NMRC for further guidance.

If amendments to the dossier only concern editorial changes, such changes should generally not be submitted as a separate variation, but they can be included in a variation relating to that part of the dossier. In such cases, the changes should be clearly identified in the application form as editorial changes. A declaration that the content of the concerned part of the dossier has not been changed should be submitted.

3.0 General Information

The requirements specified in this guideline has been adapted from the current *WHO Guidance on Variations to a Prequalified Product*, the *European Union Guidelines on Variations* and the *SADC variation guidelines*.

3.1 Objectives

This guideline is intended to: -

(a) Assist applicants with the classification of changes made to a registered FPP and related API;
(b) Provide guidance on the technical and other general data requirements to support the proposed changes.

4.0 General Guidance

Whenever FPPs have been registered on the basis of approval by a Stringent Regulatory Authority (SRA), or WHO prequalification, subsequent applications for variations should also be approved by the same SRA and WHO PQP, respectively. NMRC shall be notified of the approval of the changes and the applicant shall submit proof of approval of such changes from the respective agency.

All variation applications will be subjected to payment as per current fees payable to the Registrar (Regulation 47).

When a variation leads to a revision of the Package Insert/Professional Information (PI) or Summary of Product Characteristics (SmPC), Patient Information Leaflet (PIL) and labelling, the updated product information should be submitted as part of the application. For variations

that require generation of stability data on the API or FPP, the stability studies required, including commitment batches should always be continued to cover the currently accepted retest or shelf-life period.

Applicants should be aware that some variations may require the submission of additional consequential variations. Therefore, for any given change the applicant should consider if one or more variation application(s) may be required.

4.1 Documentation

Electronic submission of documentation (CD or DVD) should be submitted for all post registration amendments in text-selectable PDF format and in Microsoft Word (required for templates/summaries, e.g. QOS–PD, BTIF, BW). In addition, a link to the copy of submission should be sent to the following dedicated NMRC post-registration amendment email addresses:

- Medicines.Nmrc@mhss.gov.na for all pharmaceutical and quality-related changes
- Info.TIPC@mhss.gov.na for all labelling, safety and efficacy related-changes

5.0 Glossary

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

Active Pharmaceutical Ingredient (API)

Any component that provides pharmacological activity or other direct effect in the diagnosis, cure, mitigation, treatment, or prevention of disease, or to affect the structure or any function of the body of man or animals. It may sometimes be referred to as Drug Substance (DS).

Active Pharmaceutical Ingredient Starting Material (APISM)

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.

Biobatch

The Finished Pharmaceutical Product (FPP) batch used to establish bioequivalence or similarity to the comparator product as determined in bioequivalence or bio-waiver studies, respectively.

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. It may sometimes be referred to as drug product.

In-process controls

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

Marketing Authorization Holder (MAH)

Is a person or entity who holds authorization to place a finished pharmaceutical product in the Namibian market and is responsible for that product.

Manufacturer

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

Officially recognized pharmacopoeia (or compendium)

Those pharmacopoeias recognized by NMRC (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.

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)

National Medicines Regulatory Authorities (NMRA) designated as such, as stated in the *Regulatory Authorities and Organisations that NMRC aligns with* document (Appendix 4).

6.0 Guidance for implementation

6.1 Reporting types

The reporting types are intended to provide guidance with respect to the classification of administrative, quality, safety and efficacy-related changes. Specific change examples are provided in this guideline. However, it is to be noted that a change not cited in this guideline, should be decided on a case-by-case basis. Whenever the applicant is unclear about the classification of a particular change, NMRC Secretariat should be contacted. It remains the responsibility of the applicant to submit relevant documentation to justify that the change will not have a negative impact on the quality, safety and efficacy of the product.

Individual changes normally require the submission of separate variations. Grouping of variations is acceptable in the following instances:

i) When variations are consequential to each other, e.g. introduction of a new impurity specification that requires a new analytical procedure
ii) The same change affects multiple FPPs from the same MAH
iii) Each of the change is AN type

MAHs should take into account fees payable for each variation as per gazetted fees. The grouping of changes affecting quality together with clinical/labelling/safety are not allowed. For the purpose of classification, an application involving two or more types of variations will be considered as the highest risk type, e.g. a variation grouping both a minor change and a major change will be classified as a major change.

6.2 Notifications

Notifications 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 approval but must be

notified to NMRC immediately after implementation (immediate notification (IN)), or within 12 months following implementation (annual notification (AN)) of the change. For urgent safety restriction notifications (USRN), this guideline has outlined the specific procedures to be followed.

6.2.1 Annual notification (AN)

Applicants must satisfy themselves that they meet all of the prescribed conditions for the change. The change should be summarized as part of the notification but the indicated documentation is not required at the time of submission. The documentation indicated for ANs should however be available upon request or at the time of next inspection. ANs should be submitted to NMRC within 12 months of implementation of the changes.

6.2.2. Immediate notification (IN)

Applicants must satisfy themselves that they meet all of the prescribed conditions for the change and submit all required documentation with the notification application. Such changes can be implemented immediately at the time of submission and they can be considered accepted if an objection is not issued by NMRC within the prescribed timelines within 60 days.

6.3 Minor variation (Vmin)

Minor variations are changes that may have minimal 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 variation application. The change can be implemented on receipt of a letter of approval from NMRC which is expected to be issued 120 days after submission. In the event that an approval letter is not issued within the declared timeline, such changes can be implemented after the prescribed 120 days have lapsed and they can be considered accepted if an objection letter is not issued by NMRC within the prescribed timelines within 120 days.

6.4 Major variation (Vmaj)

Major variations are changes that could have major effects on the overall safety, efficacy and quality of the FPP. The documentation required for the changes included in this reporting type must be submitted. Prior approval by NMRC is required before the changes can be implemented.

A change that is not specified in this guideline should be considered as a major variation by default. However, if the applicant believes that the change is unlikely to have major effects on the overall quality, safety and efficacy of the product, they can provide an appropriate justification in the submission together with the proposed reporting category for NMRC to review.

6.5 Periodical reporting

The periodicity should be the same as the other variations or notifications. Reports such as PSURs which have periodicity, are not necessarily variations.

7.0 New applications

Certain changes are so fundamental that they alter the terms of the accepted dossier and consequently cannot be considered as changes. For these cases a new dossier must be submitted. Examples of such changes are listed in **section 15.0**.

8.0 Conditions to be fulfilled

For each variation, attempts have been made to identify particular circumstances where lower reporting requirements (IN, AN or Vmin) are possible. A change that does not meet the conditions stipulated for these specific circumstances may be considered to be a major variation.

9.0 Documentation required

For each variation, the required documentation to be submitted has been identified. Regardless of the documents specified, applicants should ensure that they have provided all relevant information to support each variation. Each application should be accompanied by a Tabulated schedule of amendments module 1.5.2.1.

10.0 Fees

Applicants should consult the current NMRC fees schedules (Regulation 47: fees payable to the Registrar) for respective type of variation. Immediate and Annual Notifications are exempted from payment unless a notification requires a new registration certificate, henceforth, Vmin. and Vmaj. applications should be paid for. Applications for notifications that require issuance of a new/ updated registration certificate should also be paid for. However, if after evaluation, a variation is found to be in another category such as Vmin. or Vmaj., the applicant will be required to make a payment. Proof of payment of fees should be included in the submission.

11.0 Variations submission form

An application for amendment using the prescribed form should accompany every submission; this should detail the amendment being requested for by the applicant (**Submission Form for Amendment of Entry in Register** (Section 20 of the Act) (Regulation 8(1)))

Further to the requirements of this guideline, NMRC may prescribe additional requirements.

12.0 Administrative changes

Description of change		**Conditions to be fulfilled**	**Documentation required**	**Reporting type**
1 Change of the Marketing Authorization Holder (MAH) of the FPP.				
1a	Change in the name and/or corporate address of the (MAH).	1	1,3, 5, 6	IN
1b	Change of MAH from one company to another.	None	1, 3-7	IN

Conditions to be fulfilled
1) Confirmation that the MAH of the FPP remains the same legal entity.
Documentation required
1. Application for registration of a medicine – Module 1.2.1: Administrative Information Application Form. 2. 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. 3. Notarized (signed and dated) transfer of ownership documents. 4. Letter of cessation from the current MAH and letter of acceptance from the proposed MAH 5. Written declaration confirming correctness of information submitted and that no other changes have been made. 6. Revised product information, where applicable. 7. Copies of the current certificates of registration

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
2 Change in the name and/or address of a manufacturer of an API.	1	1	IN
Conditions to be fulfilled			
1. No change in the location of the manufacturing site and in the manufacturing operations.			
Documentation required			
1. A formal document from a relevant official body (e.g. NMRA) in which the new name and/or address is mentioned.			

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
3 Change in the name and/or address of a manufacturer of the FPP.	1	1-3	IN
Conditions to be fulfilled			
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. 2. Application for registration of a medicine – Module 1.2.1: Administrative Information Application Form. 3. Revised product information, where applicable.			

Description 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	AN
4b	Production or testing of the API intermediate or API.	1–2	1	IN
4c	Production, packaging or testing of the FPP intermediate or FPP*.	1–2	1-2	IN

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.

* NB: Assuming there were more than one manufacturing sites approved at the time of registration or added prior to this variation. Otherwise, technology transfer must be proved or product will be regarded as a new application.

Documentation required

1. Clear identification of the manufacturing, packaging and/or testing site to be deleted, in the letter accompanying the application.
2. Application for registration of a medicine – Module 1.2.1: Administrative Information Application Form

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
5 Change in the name of Finished Pharmaceutical Product (FPP)	1-4	1-4	Vmin

Conditions to be fulfilled

1) The brand name should not have been accepted for another product by NMRC.
2) No confusion with another drug product either when spoken or written.
3) The new name does not (i) imply superiority over another similar product and (ii) imply the presence of substance(s) not present in the product.
4) The new name should not contain a stem of an already established INN.

Documentation required

1) Declaration from the MAH that there is no other change to the FPP except for the FPP name change.
2) Revised product information.
3) Application for registration of a medicine – Module 1.2.1: Administrative Information Application Form.
4) Copy of the current certificate of registration

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
6 Change of the layout/artwork without altering meaning.	1	1 - 3	IN

Conditions to be fulfilled

1) The changes to Package Insert (PI), Patient Information Leaflet (PIL), unit carton label, inner label and/or blister strips do not contain promotional information.

Documentation required

1) Current approved product labelling.
2) Proposed product labelling, a clean and annotated version highlighting the changes made.
3) Declaration from the MAH stating that there are no other changes on the label except for the intended change.

13.0 Changes to a Certificate of Suitability to the monographs of the European Pharmacopoeia (CEP) or to a Confirmation of API-prequalification document (CPQ).

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
7 Submission of a new or updated CEP for an API or starting material or intermediate used in the manufacturing process of the API:				
7a.1	From a currently accepted manufacturer.	1–5	1–5	AN
7a.2		1–4	1–6	IN
7a.3		1, 3–4	1–6	Vmin
7b.1	From a new manufacturer.	1–4	1–6	IN
7b.2		1, 3– 4	1–6	Vmin
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.				
Documentation 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.
2. A written commitment that the applicant will inform NMRC, 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 option stipulated under section 3.2.S of the *Namibia Guideline for Submission of Applications for Registration of Pharmaceuticals for Human Use in Common Technical Document format* and SADC *Guidance on submission of applications for registration in Common Technical Document format: quality part*.
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 NMRC.
6. (S.4.1) Copy of FPP manufacturer's revised API specifications.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
8 Submission of a new or updated CPQ.				
8a.1	From a currently accepted manufacturer.	1–3	1–3, 5	AN
8a.2		1–2	1–5	Vmin
8b.1	From a new manufacturer.	1–3	1–3, 5	IN
8b.2		1–2	1–5	Vmin

Conditions to be fulfilled

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-PQ 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-PQ procedure submission option (*Option 1: confirmation of API Prequalification document*) stipulated under section 3.2.S. of the *Namibia Guideline for Submission of Applications for Registration of Pharmaceuticals for Human Use in Common Technical Document format and SADC Guidance on Submission of Applications for Registration in Common Technical Document format: Quality.*

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 NMRC.

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
9 Submission of a new or updated transmissible spongiform encephalopathy (TSE) CEP for an excipient or API (addition or replacement).	None	1	AN
Conditions to be fulfilled			
None			
Documentation required			
1. Copy of the current (updated) TSE CEP.			

14.0 Quality changes

3.2. S Drug substance (or API)

3.2. S.2 Manufacture

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
10 Replacement or addition of a new manufacturing site or manufacturer of an API involving:				
10a.1	API testing only.	1, 2, 3	1, 3–4	IN
10a.2		2, 3	1, 3–4	Vmin
10b.1	Production of API starting material.	3–4	1–2, 11	Vmin
10b.2		None	1,2,5, 6–7,11, 12	Vmaj
10c.1	Production of API intermediate.	3, 5	1–2, 11	Vmin
10c.2		None	1, 2, 5, 6–7, 11, 12	Vmaj
10d.1	Production of API.	1, 8–10	1–2, 4, 7–8	Vmin
10d.2		None	1, 2, 4, 5, 6–7, 9–10, 12	Vmaj
10e	Addition of an alternative sterilization site for the API.	Conditions are not applicable	1,2,4,5,8	Vmaj
10f	Introduction of a new site of micronisation.	1, 11	1,4,5	AN
Conditions to be fulfilled				
1. The API is non-sterile. 2. The transfer of analytical methods has been successfully undertaken. 3. No change in the FPP manufacturer's API specifications.				

4. 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.

5. 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.

6. No change in the FPP release and end-of-shelf-life specifications.

7. 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.

8. 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.

9. 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).

10. 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.

11. The particle size specification of the API and the corresponding analytical methods remains the same.

Documentation required

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 *Namibia Guideline for Submission of Applications for Registration of Pharmaceuticals for Human Use in Common Technical Document format and SADC Guidance on submission of applications for registration in Common Technical Document format: quality*.

6. (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 NMRC.

7. (S.4.1) A copy of the FPP manufacturer's API specifications.

8. (S.2) A declaration from the supplier of the registered 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.

9. A discussion of the impact of the new API on the safety, efficacy and quality of the FPP.

10. 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.

11. 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.

12. 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 be fulfilled	Documentation required	Reporting type
11 Change or addition of a manufacturing block or unit at a currently accepted site of API manufacture.	1-5	1–4	Vmin

Conditions to be fulfilled

1. The API is non-sterile.

2. The API manufacturing block or unit is currently accepted.

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.

Documentation required

1. (S.2) A declaration from the supplier of the API 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.

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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
12a	12 Change in the manufacturing process of the API	1–3, 9	1-2,7	AN
12b.1		1–4, 6–9	2–3, 10–11	IN
12b.2		1–4, 6–8, 10	2–3, 10–11	Vmin
12c		1–4,7	2–3, 10–11	Vmin
12d		None	1–13	Vmaj

Conditions to be fulfilled

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.

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.

Documentation required

1. (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 NMRC.

2. (S.2.2) A side-by-side comparison of the current process and the new process.

3. (S.2.2) A flow diagram of the proposed synthetic process(es) and a brief narrative description of the proposed manufacturing process(es).

4. (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.

5. (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.

6. (S.2.4) Information on controls of critical steps and intermediates, where applicable.

7. (S.2.5) Evidence of process validation and/or evaluation studies for sterilization, if applicable.

8. (S.3.1) Evidence for elucidation of structure, where applicable.

9. (S.3.2) Information on impurities.

10. (S.4.1) A copy of currently accepted specifications of API (and starting material and intermediate, if applicable).

11. (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.

12. (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.

13. 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 be fulfilled	Documentation required	Reporting type
13 Change in the in-process tests or limits applied during the manufacture of the API:				
13a	Tightening of in-process limits	1–3	1	AN
13b	Addition of a new in-process test and limit	1,4	1–5	AN
13c	Addition or replacement of an in-process test as a result of a safety or quality issue	None	1–5, 7, 8–10	Vmin
13d.1	Deletion of an in-process test	1, 5–6	1–3, 6	AN
13d.2		None	1–3, 7–10	Vmaj
13e	Relaxation of the in-process test limits	None	1–3, 5, 7–10	Vmaj

Conditions to be fulfilled

1. The change is not necessitated by unexpected events arising during manufacture e.g. a new unqualified impurity or a change in total impurity limits.

2. The change is within the range of currently accepted limits.

3. The analytical procedure remains the same, or changes to the analytical procedure are minor.

4. Any new analytical procedure does not concern a novel non-standard technique or a standard technique used in a novel way.

5. The affected parameter is non-significant.

6. The change does not affect the sterilization procedures of a sterile API.

Documentation required

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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
14 Change in batch size of the API or intermediate involving:				
14a	Up to 10-fold compared to the currently accepted batch size.	1–2, 4, 5	1, 3–4	AN
14b.1	Downscaling.	1–4	1, 3–4	AN
14b.2		1–3	1–4	IN
14c	More than 10-fold increase compared to the currently accepted batch size.	1–2, 4, 5	1, 3–4	Vmin

Conditions to be fulfilled

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 proposed batch size increase is relative to either the originally accepted batch size, or the batch size accepted through a subsequent major or minor variation.

Documentation required

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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
15 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) involving:				
15a	Tightening of the specification limits	1–3	1–3	AN
15b	Minor change to an analytical procedure	4–6	2–3	AN
15c	Addition of a new specification parameter and a corresponding analytical procedure where necessary	1, 6–8	1–3	AN
15d	Deletion of a specification parameter or deletion of an analytical procedure	1, 9	1–4	AN
15e	Addition or replacement of a specification parameter as a result of a safety or quality issue	None	1–3, 5	Vmin
15f	Relaxation of the currently accepted specification limits for solvents, reagents, catalysts and raw materials	1, 6, 8–9	1, 3–4	IN
15g	Relaxation of the currently accepted specification limits for API starting materials and intermediates	None	1–3, 5	Vmaj
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. Any change is within the range of currently accepted limits.

3. The analytical procedure remains the same.

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 variations beyond the acceptable ranges or a different type of column and method).

5. 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.

6. No change to the total impurity limits; no new impurities are detected.

7. Any new analytical procedure does not concern a novel non-standard technique or a standard technique used in a novel way.

8. The change does not concern a genotoxic impurity.

9. The affected parameter is non-significant or the alternative analytical procedure has been previously accepted.

Documentation required

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	Conditions to be fulfilled	Documentation required	Reporting type
16 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.	1	1–4	IN
Conditions to be fulfilled			
1. 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.			
Documentation required			
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 why the change does not affect the FPP manufacturer's specifications.			

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

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
17 Change to the test parameters or acceptance criteria of the API specifications of the FPP manufacturer involving:				
17a	Updating a test parameter or acceptance criterion controlled in compliance with an officially recognized pharmacopoeial monograph as a result of an update to this monograph to which the API is controlled.	10	1–5	AN
17b.1	Deletion of a test parameter.	1–2	1, 6	AN
17b.2		None	1, 6	IN
17c.1	Addition of a test parameter.	1, 4–8	1–6	AN
17c.2		1, 5–6	1–6	Vmin
17c.3		None	1–7	Vmaj
17d.1	Replacement of a test parameter	1, 5–8	1–6	IN
17d.2		5, 7	1–6	Vmin
17d.3		None	1–7	Vmaj
17e.1	Tightening of an acceptance criterion	1, 3, 9	1, 6	AN
17f.1	Relaxation of an acceptance criterion	1, 5–9	1, 6	IN
17f.2		5, 7	1, 6	Vmin
17f.3		None	1, 6–7	Vmaj
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. No change is required in FPP release and shelf-life specifications.
Documentation required

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 NMRC for advice. For changes to the polymorph of an insoluble API the applicant should contact NMRC for advice before embarking upon any investigation.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
18 Change to the analytical procedures used to control the API by the FPP manufacturer involving:				
18a	Change in an analytical procedure as a result of a revision to the officially recognized pharmacopoeial monograph to which the API is controlled.	None	1–3	AN
18b	Change from a currently accepted in-house analytical procedure to an analytical procedure in an officially recognized pharmacopoeia or from the analytical procedure in one officially recognized pharmacopoeia to an analytical procedure in another official recognized pharmacopoeia.	None	1–4	IN
18c.1	Addition of an analytical procedure.	1–3	1–3	AN
18c.2		3,8	1–3	AN
18c.3		None	1–3	Vmaj
18d.1	Modification or replacement of an analytical procedure.	1–6	1–4	AN
18d.2		2–3, 5–6,8	1–4	AN
18d.3		1–3, 5–6	1–4	Vmin
18d.4		5–6,8	1–4	Vmin
18d.5		None	1–4	Vmaj
18e.1	Deletion of an analytical procedure.	6–7	1, 5	AN
18e.2		6,8	1, 5	IN
18e.3		None	1, 5	Vmaj

Conditions to be fulfilled
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 variations 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.
Documentation required
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. (S.4.5) Justification for the deletion of the analytical procedure, with supporting data.

3.2. S.6 Container-closure system

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
19a1	19 Change in the immediate packaging (primary and functional secondary components) for the storage and shipment of the API.	1–2, 3	2–3	IN
19a2		3	1–3	Vmin

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 is not the result of stability issues.

Documentation required

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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
20 Change in the specifications of the immediate packaging for the storage and shipment of the API involving:				
20a	Tightening of specification limits.	1–2	1	AN
20b	Addition of a test parameter.	2–3	1–3	AN
20c	Deletion of a non-critical parameter.	2	1, 4	AN

Conditions 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.

Documentation required

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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
21 Change to an analytical procedure on the immediate packaging of the API involving:				
21a	Minor change to an analytical procedure.	1–3	1	AN
21b	Other changes to an analytical procedure including addition or replacement of an analytical procedure.	2–4	1	AN
21c	Deletion of an analytical procedure.	5	2	AN

Conditions to be fulfilled

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 variations 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.

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

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
22 Change in the retest period or shelf-life of the API involving:				
22a	Reduction.	3	1–2	IN
22b	Extension.	1–2	1–3	Vmin
Conditions to be fulfilled				
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.				
Documentation required				
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.				

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
23 Change in the labelled storage conditions of the API involving:				
23a	Any change in the storage conditions.	1	1	Vmin
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.				
Documentation required				
1. (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

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
24a	24 Change in the composition of a solution dosage form.	1–6	2, 4, 7, 9–10	IN
24b		None	1–10	Vmaj
Conditions to be fulfilled				
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 ±10% of the amount (or concentration) of each excipient in the originally registered product.				
Documentation required				

1. Supporting clinical or comparative bioavailability data or justification for not submitting a new bioequivalence study according to the current SADC guidelines on bioequivalence - *GUIDELINE FOR BIOAVAILABILITY AND BIOEQUIVALANCE (SADC/ICM/2/2005/3.3*).

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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
25 Change in the colouring system or the flavouring system currently used in the FPP involving:				
25a	Reduction or increase of one or more components of the colouring or the flavouring system.	1–3, 6-7	1, 3, 5–7	AN
25b	Deletion, addition or replacement of one or more components of the colouring or the flavouring system.	1–7	1–7	IN

Conditions to be fulfilled

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 *NMRC Guidance on Submission of Application for Registration in Common Technical format: Quality*.

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 *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 an equivalent guide from the ICH region and associated countries.

6. For paediatric products, the change does not require submission of results of palatability studies.

7. The change is not the result of stability issues and/or should not result in potential safety concerns, i.e. differentiation between strengths.

Documentation required

1. (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).

2. (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.

3. (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.

4. (P.5.3) If applicable, data to demonstrate that the new excipient does not interfere with the analytical procedures for the FPP.

5. (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.

6. (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.

7. Revised product information, where applicable.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
26 Change in weight of tablet coatings or capsule shells involving:				
26a	Immediate-release oral FPPs.	1–3	2–5	AN
26b	Gastro-resistant, modified or prolonged release FPPs.	None	1–5	Vmaj

Conditions to be fulfilled

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.

[#] Multipoint dissolution profile of the biobatch should be provided for comparison.

Documentation required

1. Justification for not submitting a new bioequivalence study according to the current *SADC guideline on bioavailability/bioequivalence.*

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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
27 Change in the composition of an immediate-release solid oral dosage form including:				
27a.1	Replacement of a single excipient with a comparable excipient at a similar concentration.	1–5	1–11	Vmin
27a.2		None	1–11	Vmaj
27b.1	Quantitative changes in excipients.	1–4	1–4, 7–11	Vmin
27b.2		None	1–4, 7–11	Vmaj

Conditions to be fulfilled

1. No change in functional characteristics of the pharmaceutical form.

2. Only minor adjustments (see Section 16) 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 *Namibia Guideline for Submission of Applications for Registration of Pharmaceuticals for Human Use in Common Technical Document format and SADC Guidance on Submission of Application for Registration in Common Technical format: Quality* (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.

Documentation required

1. Supporting clinical or comparative bioavailability data or justification for not submitting a new bioequivalence study according to the current *SADC guidelines on bioavailability/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.

11. Revised product information, where applicable.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
28 Change or addition of imprints, embossing or other markings, including replacement or addition of inks used for product markings and change in scoring configuration involving:				
28a	Changes in imprints, embossing or other markings.	1–3	1–2, 4–6	IN
28b	Deletion of a scoreline.	2–5	1, 4–6	IN
28c.1	Addition of a scoreline.	2–4	1, 2, 4–6	Vmin
28c.2		None	1, 2–6	Vmaj

Conditions to be fulfilled

1. Any ink complies with section 3.2.P.4 of the *SADC Guidance on Submission of Application for Registration in Common Technical format: Quality.*

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 as requested by NMRC.

5. The scoring is not intended to divide the FPP into equal doses.

Documentation required

1. (P.1.) Qualitative composition of the ink, if purchased as a mixture.

2. (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.

3. (P.2) Demonstration of the similarity of the release rate of the tablet portions for gastro-resistant, modified or prolonged release products.

4. (P.5) Copies of revised FPP release and shelf-life specifications.

5. (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.

6. Revised product information, where applicable.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
29 Change in dimensions without change in qualitative or quantitative composition and mean mass of:				
29a	Tablets, capsules, suppositories and pessaries other than those stated in change no. 29b.	1–2	2-5	IN
29b	Gastro-resistant, modified or prolonged-release FPPs and scored tablets.	1–2	1–5	Vmin

Conditions to be fulfilled

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 *SADC guideline on bioavailability/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. (P.2) Discussion on the differences in manufacturing process(es) between the currently accepted and proposed products and the potential impact on product performance.

3. (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.

4. (P.5) Copies of revised FPP release and shelf-life specifications.

5. (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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
30..Change in the solvent/diluent container from the pack				
30a	Deletion of the solvent/diluent container from the pack.	None	1-2	Vmin
30b	Addition of solvent/diluent container in the pack.	None	2-4	Vmaj

Documentation required

1) Justification for the deletion, including a statement regarding alternative means to obtain the solvent/diluent as required for the safe and effective use of the pharmaceutical product.
2) Revised product information
3) Replacement of the relevant pages of the dossier as per the *Namibia Guideline for Submission of Applications for Registration of Pharmaceuticals for Human Use in Common Technical Document format* and *SADC Guidance on Submission of Applications for Registration in Common Technical Document format: Quality*.
4) Evidence that the site responsible for the manufacture of the solvent/diluent is authorized by the competent Authority in the country of origin and satisfactorily inspected by an authority recognised by NMRC.

3.2. P.3 Manufacture

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
31 Addition or replacement of a manufacturing site for part or all of the manufacturing process for an FPP involving:				
31a	Secondary packaging of all types of FPPs.	2–3	1	IN
31b	Primary packaging site of:			
31b.1	Solid FPPs (e.g. tablets, capsules), semi-solid FPPs (e.g. ointments, creams) and solution liquid FPPs.	2–4	1, 8	IN
31b.2	Other liquid FPPs (suspensions, emulsions).	2–5	1, 5, 8	IN
31c	Site where any manufacturing operation(s) take place, except batch release, batch control and/or release testing.	1-3,5	1-10	Vmin
31d	Site where any manufacturing operation(s) take place, including batch release, batch control and/or release testing.	1,3,5-6	1-11	Vmin
Conditions to be fulfilled				

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 by an authority recognised by NMRC and/or an SRA. 3. Evidence that the site is authorized by the competent Authority in the country of origin. 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. 6. Transfer of methods from the current testing site to the proposed testing site has been successfully completed.
Documentation required

1. Evidence that the site responsible for the manufacture of the FPP is authorized by the competent Authority in the country of origin and satisfactorily inspected by an authority recognised by NMRC.

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.

10. Revised product information.

11. (P.5.3) Documented evidence of successful transfer of analytical procedures from the current to the proposed site.

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
32 Replacement or addition of a site involving batch control testing.	1–2	1–3	IN

Conditions to be fulfilled

1. Site is appropriately authorized by NMRC and satisfactorily inspected either by an authority recognised by NMRC or an SRA.

2. Transfer of methods from the current testing site to the proposed testing site has been successfully completed.

Documentation required

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 an authority recognised by NMRC or an SRA.

3. (P.5.3) Documented evidence of successful transfer of analytical procedures from the current to the proposed site.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
33 Change in the batch size of the FPP involving:				
33a	Up to and including a factor of 10 compared to the biobatch.	1–7	2, 5–6	IN
33b	Downscaling.	1–5	2, 6	AN
33c	More than 10 folds compared to the biobatch.	1–7	1–7	Vmin

Conditions to be fulfilled

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.

Documentation required

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 *SADC Guidelines on bioavailability/bioequivalence.*

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
34..Change in the manufacturing process of the FPP/ Introduction or increase in the overage that is used for the API.				
34a	Change in the manufacturing process of the FPP.	1–9	1–4, 6–7	AN
34b		1–3, 5–9	1–7	Vmin
34c	Introduction or increase in the overage that is used for the API.	1-9	1-8	Vmin

Conditions to be fulfilled

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, or for the sole purpose of extending the shelf life.
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.

Documentation required

1. Supporting clinical or comparative bioavailability data or justification for not submitting a new bioequivalence study according to the current *SADC guidelines on bioavailability/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 non-dissolved 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.

8. Justification and supporting documentation for the introduction or increasing of an overage.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
35 Change to in-process tests or limits applied during the manufacture of the FPP or intermediate involving:				
35a	Tightening of in-process limits.	1–2, 5	1	AN
35b	Deletion of a test.	2, 4	1, 6	AN
35c	Addition of new tests and limits.	2–3	1–6	AN
35d	Revision or replacement of a test.	2–3	1–6	IN

Conditions to be fulfilled

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 variation).

5. No change in the analytical procedure.

Documentation required

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

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
36 Change in source of an excipient from a TSE risk to a material of vegetable or synthetic origin.	1	1	AN
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.			

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
37 Change in the specifications or analytical procedures for an excipient involving:				
37a	Deletion of a non-significant in-house parameter.	2	1–3	AN
37b	Addition of a new test parameter or analytical procedure.	2–3	1–2	AN
37c	Tightening of specification limits.	1–2, 4	1–2	AN
37d	Change or replacement of an analytical procedure.	2–3	1–2	Vmin
Conditions 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 to be fulfilled**	**Documentation required**	**Reporting type**
38 Change in specifications of an excipient to comply with an officially recognized pharmacopoeia.	1	1	AN
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

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
39 Change in FPP standard/Update to specifications				
39a	Change in the standard claimed for the FPP from an in-house to an officially recognized pharmacopoeial standard.	1–3	1–5	AN
39b	Update to the specifications to comply with an officially recognized pharmacopoeial monograph as a result of an update to this monograph to which the FPP is controlled.	None	1, 3, 5	AN
Conditions to be fulfilled				
1. The change is made exclusively to comply with the officially recognized pharmacopoeia. 2. No change to the specifications that result 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 39a or 39d and should follow the corresponding reporting types.				
Documentation required				

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.

Description of change		**Conditions to be fulfilled**	**Documentation required**	**Reporting type**
40 Change in the specifications of the FPP involving test parameters and acceptance criteria:				
40a	Deletion of a test parameter.	5	1, 6	AN
40b	Addition of a test parameter.	2–4, 7	1–6	AN
40c	Tightening of an acceptance criterion.	1–2	1, 6	AN
40d	Relaxation of an acceptance criterion.	2, 4, 6–7	1, 5–6	IN
40e	Replacement of a test parameter.	2–4, 6-7	1–6	IN
Conditions 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 e.g new unqualified impurity; change in total impurity limits, 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.

Documentation required

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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
41 Change in the analytical procedures for the FPP involving:				
41a	Deletion of an analytical procedure.	5	1, 6	AN
41b	Addition of an analytical procedure.	3–4, 6–7	1–5	AN
41c.1	Modification or replacement of an analytical procedure.	1–4, 6–7	1–5	AN
41c.2		2–4, 6–7	1–5	Vmin
41d	Updating the analytical procedure with an officially recognized pharmacopoeial monograph as a result of an update to that monograph.	None	1–5	AN
41e	Change from an in-house analytical 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.	2, 7	1–3, 5	IN
Conditions to be fulfilled				

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 variations 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.

Documentation required

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

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
42a	42 Replacement or addition of a primary packaging type.	1	1, 3–5	Vmin
42b		None	1–5	Vmaj

Conditions to be fulfilled

1. The change does not concern a sterile FPP.

Documentation required

1. (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.

2. (P.3.5) For sterile FPPs, process validation and/or evaluation studies.

3. (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).

4. (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.

5. (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.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
43 Change in the package size involving:				
43a	Change in the number of units (e.g. tablets, ampoules, etc.) in a package.	1–2	1–3	Vmin
43b.1	Change in the fill weight or fill volume of non-parenteral multidose products.	1–3	1–3	IN
43b.2		1–2	1–3	Vmin
Conditions to be fulfilled				
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.				
Documentation required				
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 NMRC guidelines for products where stability parameters could be affected. 3. Revised product information.				

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
44 Change in the shape or dimensions of the container or closure for:				
44a	Non-sterile FPPs.	1–2	1–3	AN
44b	Sterile FPPs.	1–2	1–4	Vmin

Conditions to be fulfilled
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.
Documentation required
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.

Description of change		**Conditions to be fulfilled**	**Documentation required**	**Reporting type**
45 Change in qualitative and/or quantitative composition of the immediate packaging material for:				
45a	Solid FPPs.	1–3	1–3	IN
45b	Semisolid and liquid FPPs.	1–3	1–3	Vmin
Conditions to be fulfilled				

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.
Documentation required
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.

Description of change		**Conditions to be fulfilled**	**Documentation required**	**Reporting type**
46 Change in the specifications of the immediate packaging involving:				
46a	Tightening of specification limits.	1–2	1	AN
46b	Addition of a test parameter.	2–3	1–2	AN
46c	Deletion of a non-critical parameter.	2	1, 3	AN
Conditions 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.
Documentation required
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.

Description of change		**Conditions to be fulfilled**	**Documentation required**	**Reporting type**
47 Change to an analytical procedure on the immediate packaging involving:				
47a	Minor change to an analytical procedure.	1–3	1	AN
47b	Other changes to an analytical procedure including addition or replacement of an analytical procedure.	2–4	1	AN
47c	Deletion of an analytical procedure.	5	2	AN
Conditions to be fulfilled				

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 variations 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.

Description of change	**Conditions to be fulfilled**	**Documentation required**	**Reporting type**
48 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).	1	1	IN
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.			
Documentation required			
1. (P.7) Information on the proposed packaging material (e.g. description, materials of construction, and specifications).			

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
49 Change to an administration or measuring device that is not an integral part of the primary packaging (excluding spacer devices for metered dose inhalers) involving:				
49a	Addition or replacement.	1, 2	1–2	IN
49b	Deletion.	3	3	IN

Conditions to be fulfilled

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

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
50 Change in the shelf-life of the FPP (as packaged for sale) involving:				
50a	Reduction.	3	1–3	IN
50b	Extension.	1–2	1–3	Vmin

Conditions to be fulfilled

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.

Documentation required

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.

4. Revised product information.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
51 Change in the in-use period of the FPP (after first opening or after reconstitution or dilution):				
51a	Reduction.	1	1, 3	IN
51b	Extension.	None	1–3	Vmin
Conditions to be fulfilled				
1. The change is not necessitated by unexpected events arising during manufacture or because of stability concerns.				
Documentation required				
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. 3. Revised product information.				

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
52 Change in the labelled storage conditions of the FPP (as packaged for sale), the product during the in-use period or the product after reconstitution or dilution.	1	1–3	Vmin
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.			
Documentation required			
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. 3. Revised product information			

15.0 Examples of changes that make a new application necessary.

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
1. Change of the API to a different API. 2. Inclusion of an additional API in a multicomponent product. 3. Removal of one API from a 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.	None	1	New application
Conditions to be fulfilled			
None.			
Documentation required			
1. Documents in fulfilment of the requirements outlined in the *Namibia Guideline for Submission of Applications for Registration of Pharmaceuticals for Human Use in Common Technical Document format* and *SADC Guidance on Submission of Application for Registration in Common Technical Document format: Quality*.			

16.0 Permissible quantitative 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	
• 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 not be 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.

17.0 Labelling, Safety and Efficacy related-changes

For any change to labelling information (PI/ SmPC, PIL, labels) not covered by the variation categories described in this document, NMRC must be consulted and submission of the revised labelling information is expected as per *NMRC Guidance for the Preparation and Submission of Common Technical Document*, *SADC Guideline on Product Information* and other relevant guidelines. For changes related to safety and efficacy, MAHs should provide the following:

Documentation required
1. A cover letter stating the changes to be made 2. Current NMRC approved PI/PIL 3. A clearly annotated PI/PIL in a word or text-selectable PDF format (not a scanned copy) 4. For generic applications, the latest NMRC approved innovator PI, and if not marketed in Namibia, the most recent NMRC updated generic medicine PI or SRA approved innovator PI. 5. Clinical study data / studies demonstrating additional pharmacokinetic properties in special populations / peer-reviewed literature-based studies / any other relevant studies that supports the variation 6. Dear Healthcare Professional (DHCP) Letter 7. PBRER/PSUR 8. RMP

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
53 Change(s) to therapeutic indication(s)				
53a.	Deletion of a therapeutic indication.	1, 3 - 4	1-5	Vmin
53b.		1 - 4	1-5	Vmaj
53c.	Addition of a new therapeutic indication or modification of an approved one supported by new clinical trial data	None	1-5	Vmaj

Conditions to be fulfilled

1. Product must be an innovator product. Generic/biosimilar products with changes to the indication that is independent of the innovator or reference product are also covered under this variation.
2. Deletion is due to safety and efficacy reasons
3. Deletion is not due to safety or efficacy reasons
4. Where the deletion of a therapeutic indication is deemed urgent for safety and efficacy reasons, applicants must follow the USRN procedure instead and use **variation 59**.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
54 Safety or safety-related change(s) in the PI/PIL of an innovator medicine, which has been approved by an SRA, and which does NOT alter the clinical benefit-risk profile for the use of the medicine, or does NOT soften any safety or safety related information				
54a.	Addition of post-marketing side effects / interactions	1	1-5	Vmin
54b.	Addition of special warnings and precautions for use / contraindications	2-4	1-5	Vmin

Conditions to be fulfilled

1. If significant modification to the PIL/PI/SmPC due to new quality, pre-clinical, clinical or pharmacovigilance data refer to **variation 57**
2. Additions to special warnings and precautions for use may NOT contradict existing contraindications approved by the NMRC.
3. For the addition of special warnings and precautions for use / contraindications, applicants are required to submit any new data in support of the application primarily for record-keeping purposes. However, the NMRC may review the data as part of the evaluation where necessary on a case-by-case basis
4. Where a safety restriction regarding special warnings and precautions for use is deemed urgent, applicants must follow the USRN procedure instead and use **variation 59.**

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
55 Change(s) in the PI or PIL of a generic/biosimilar product following approval/implementation of the same change for the innovator or reference product.	1	1-5	Vmin
Conditions to be fulfilled			
1. Any changes to contraindications and special warnings and precautions for use applied for under this variation may NOT contradict existing contraindications approved by the NMRC.			

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
56a.	56 Change(s) in the PI, PIL or Label of medicines intended to implement a recommendation from the Council arising from a USRN, PSUR, PASS, PBRER, or RMP, including those approved by an SRA.	1	1-3, 6	IN
56b.		None	1-8	Vmaj
Conditions to be fulfilled 1. For urgent safety restrictions, this variation category should be used together with the USRN procedure initiated by the MAH. In these instances, this category takes preference over others which may result in similar changes to the PI/PIL, but where the variation application is not deemed urgent (e.g., the addition of a warning / contraindication may also arise through variations 54 and 57 where no USRN procedure is required).				

Description of change	Conditions to be fulfilled	Documentation required	Reporting type
57 Significant modification to the PIL/PI/SmPC due to new quality, pre-clinical, clinical or pharmacovigilance data (includes but not limited to amendment to approved dosage instruction/information; modification / deletion of a contraindication; changes to the benefit-risk profile of the medicine; safety-related changes that stem from significant public health concern, food safety or environmental changes).	1,2	1-5,7,8	Vmaj

Conditions to be fulfilled

1. Where a safety restriction is deemed urgent, applicants must follow the USRN procedure instead and use **variation 59**
2. For a generic / biosimilar, variation 55 will apply instead when the same change has already been implemented for the associated reference product.

Description of change		Conditions to be fulfilled	Documentation required	Reporting type
58a.	58 Implementation of editorial changes to the PI and PIL	1	1-3	IN
58b.		2	1-3	Vmin

Conditions to be fulfilled

1. Changes that do not have an impact on the safe use of medicines (e.g. deleting obsolete information, improving the flow of information, harmonising or combining of PIs within a range in line with recent approvals)
2. Changes that have an impact on the safe use of medicines

59. URGENT SAFETY RESTRICTION NOTIFICATION (USRN)

The following amendments relating to safety will be allowed as USRNs. An USRN may only be used for an amendment which has a **more restrictive effect** on the safe use of the medicines than has been previously approved by the NMRC, such as:

- Modification/deletion of therapeutic indication
- Limiting the population in which the product may be used
- Adding a contraindication, warning and special precaution, interaction or adverse reaction
- Adding an instruction on posology that is intended to improve the safe use of the medicine

Changes not allowed include:

- Additional headings
- Changes which in any way may relax the way in which the medicine is used.
- Any wording or information to further qualify ("soften") or elaborate on the new safety-related information, such as "unknown clinical significance", "only occurs at higher dose", "occurs rarely", etc.
- Comparative statements
- Class statements, e.g., "as with other beta-blockers"
- Additional information on lack of interaction with other substances
- Additional information on treatment of overdose

The following procedures should be followed for USRNs:

1. The applicant should immediately notify the Council of the restrictions to be introduced.

2. The Council will respond to the applicant within **15 days** confirming whether the request qualifies as an USRN or not. If no response and/or objections are received from the Council within the **15 days**, the application is deemed accepted as an USRN.

3. The applicant must within **7 days** of receipt of response from the Council (or if no response is received from the Council within **15 days**) submit the USRN variation application accompanied by a Dear Healthcare Professional (DHCP) letter for urgent review.

4. In instances where the Council has imposed the USRN, the applicant must within **15 days** of initial notification from the Council submit the USRN and DHCP letter for urgent review.

5. USRN applications will typically be handled through variation **56** (the document requirements for a USRN application are those associated with **variation 56)**. In instances where there is no implementation of wording agreed by the Council, and where the USRN-related amendments have yet to be approved for the local innovator PI, generics may submit the DHCP letter separately from the USRN application. The DHCP letter should be submitted immediately upfront, with the USRN application following as a **variation 55** once the associated innovator PI has been finalised.

6. The review of the USRN application may run in parallel with the issuing of a DHCP letter. The draft DHCP letter will be reviewed according to internal NMRC procedures. The DHCP letter review should be finalised within a time period of no longer than **30 days** (includes interaction with the applicant/MAH).

7. The MAH should distribute the DHCP letter to the relevant healthcare professionals within **10 days** of receipt of the finalised DHCP letter.

8. Unless the applicant receives a written objection from NMRC within **60 days** of receipt of the submission for an USRN, the applicant shall commence implementation of the USRN to the PI.

9. The USRN and the variations which are related to the safety issues shall be implemented within the time frame agreed by the applicant and the Council and submission of the revised PI/PIL for the Council records.

10. The amended PI must be made publicly available (either in hard copy or electronically) within **120 days** of commencement of the implementation of the USRN.

11. If an applicant is found to have implemented an USRN to the PI without complying with the process, the applicant will be required to resubmit full documentation with repayment of the required fee.

18.0 REFERENCES

18.1 SADC Variation Guidelines Second Draft, SADC MRH PROJECT

18.2 South African Health Products Regulatory Authority Variations Addendum for Human and Veterinary Medicines 01 Feb 2022. Accessed from: https://www.sahpra.org.za/document/variations-addendum-for-human-and-veterinary-medicines/

18.3 Guidelines on Variations to a Prequalified Product, In: *WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-seventh report.* Geneva, World Health Organization, 2013, Annex 3 (WHO Technical Report Series, No. 981). Accessed from:https://www.who.int/docs/default-source/medicines/norms-and-standards/guidelines/prequalification/trs981-annex3-who-variations-prequalified-product.pdf?sfvrsn=809e81b_2

18.4 European Union Guidelines on the details of the various categories of variations to the terms of marketing authorizations for medicinal products for human use and veterinary medicinal products, 12 December 2008. Accessed from: https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2013:223:FULL:EN:PDF

19.0 APPENDICES

Appendix 1: Submission Form for Amendment of Entry in Register

SUBMISSION FORM FOR AMENDMENT OF ENTRY IN REGISTER

NAMIBIA MEDICINES REGULATORY COUNCIL

MINISTRY OF HEALTH AND SOCIAL SERVICES

Submission Form for Major Variations, Minor Variations, Immediate Notifications and Annual Notifications

The following documents must be included as part of the submission of a variation application to NMRC:

a) *Letter of application*
b) *Variation submission form*
c) *Application for registration of a medicine – Module 1.2.1: Administrative Information Application Form (if applicable)*
d) *Supporting documents*

Please complete each section of this application form electronically as a signed Word document or a text-selectable PDF document. Please ensure that the electronic and the printed versions of the completed form accompany your submission.

a) Particulars of the Market Authorization Holder

Name:	
Business address:	
Postal address:	
Telephone no:	
Fax no:	
E-mail address:	
Local Representative (for correspondence)	*Name:* *Phone:* *Fax:* *Email:*

b) Type of Variation:
(✓) where applicable

Administrative ☐	Pharmaceutical & Quality ☐	Safety ☐	Efficacy ☐

Reporting types

Major Variation (V.Maj) ☐	Minor Variation (V.Min) ☐	Immediate Variation (IN) ☐	Annual Variation (AN) ☐	USRN ☐

c) Summary of proposed changes

Pre-change details	Proposed Post-Change details	Justification

d) Documentation checklist

Note: All documents must be provided for this application to be valid	**Yes (Y)**	**No (N)**
Letter of application		
Application for registration of a medicine – Module 1.2.1: Administrative Information Application Form (if applicable)		
Supporting documentation *All parts of the dossier that are affected by a variation have been resubmitted for Variations to Registered Medicines.*		
Amendment fees *Applicable fees as per the fee schedule have been paid (POP)*		

Supporting Documents Attached			
1		**7**	
2		**8**	
3		**9**	
4		**10**	
5		**11**	
6		**12**	

e) Declaration

I declare that:

☐ *For each change all conditions as stipulated for the change requested are fulfilled.*

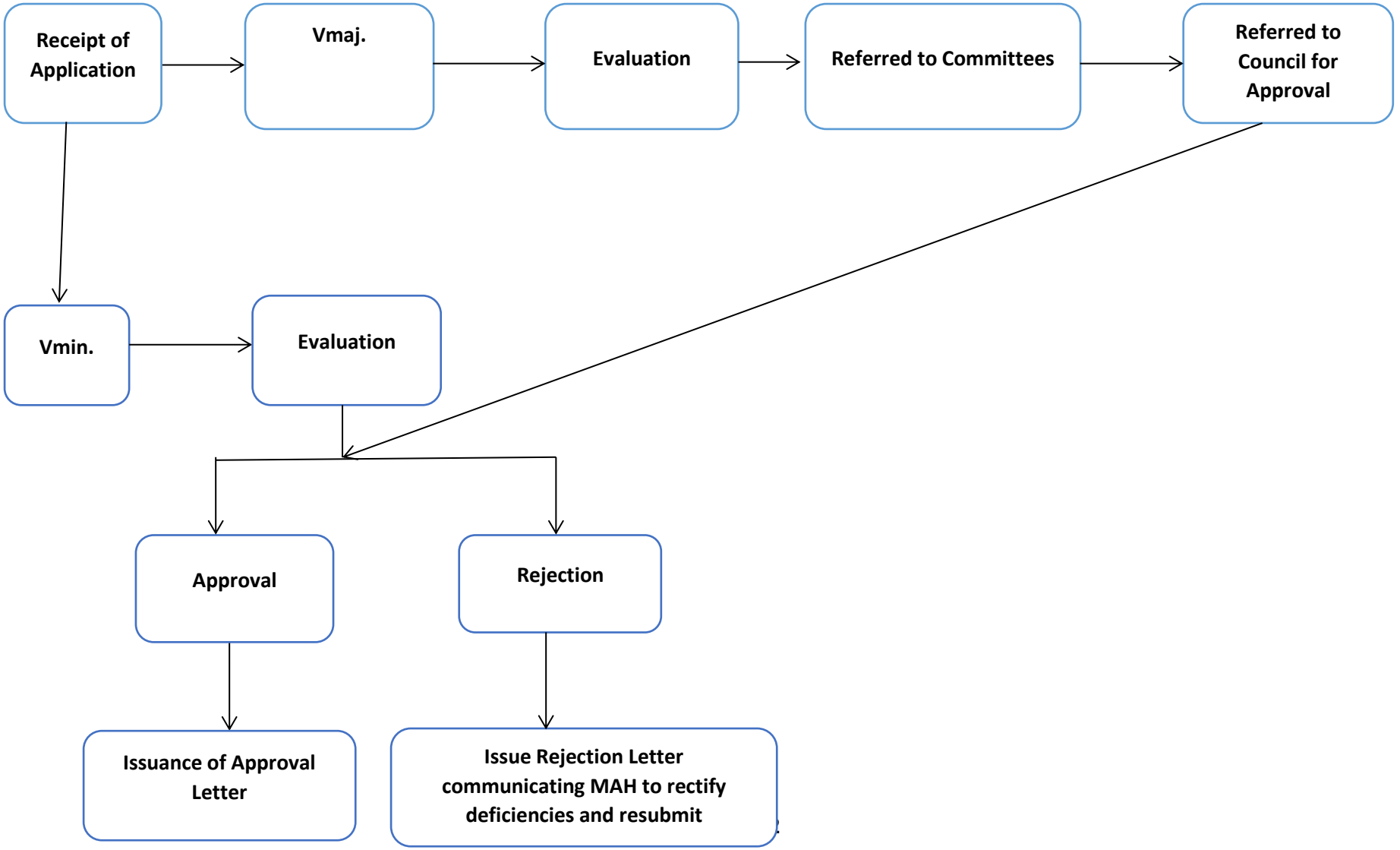
☐ *There are no changes being made other than those applied for in this submission, except for possible editorial changes. Any other changes will be applied for separately.*

☐ *The information contained herein and in supporting documents is correct and true.*

Name in block letters: _____

Signature: _____ *Date of current amendment(s):* _____

Appendix 2: Algorithm for Evaluation of Vmin. And Vmaj. Variations



Appendix 3: Timelines for NMRC[#] variations:

	AN	IN	Vmajor	Vminor	Urgent
Acknowledgement	Acknowledge receipt: 45 days**	Acknowledge receipt: 7 days	Acknowledge receipt: 7 days	Acknowledge receipt: 7 days	Acknowledge receipt: 7 days
Time to process variation	No definite timeline	60 days	180 days	120 days	30 days (IN); 90 days (Vmajor & Vmin) or following Council meeting

#NMRC will adopt / Follow the same timelines as WHO and SADC for the implementation of any future changes to the WHO or SADC variation classification guidelines (e.g., if the WHO or SADC implements a 3 – month transition period associated with a new requirement, the same timelines will apply in Namibia).

**Days refers to calendars days unless otherwise stated.

Appendix 4: Regulatory authorities and organisations that NMRC aligns with

MINISTRY OF HEALTH AND SOCIAL SERVICES

REGULATORY AUTHORITIES (RAs) AND ORGANISATIONS THAT NMRC ALIGNS WITH

NAMIBIA MEDICINES REGULATORY COUNCIL

A. FOR REGISTRATION AND POST REGISTRATION AMENDMENT/VARIATION PURPOSES:

Council may fast track the registration and/or review of post registration amendments of products registered/approved by the following regulatory authorities:

1. WHO via the WHO Collaborative Registration Procedure only.
2. United States Food and Drug Administration (USA)
3. Therapeutic Goods Administration (Australia)
4. Health Canada (Canada)
5. Ministry of Health, Labour and Welfare (Japan)
6. European Medicines Agency (EMA).
7. Medicines and Healthcare products Regulatory Agency and Veterinary Medicines Directorate (UK)
8. National Agency for Medicines and Health Products Safety (France)
9. Federal Institute for Drugs and Medical Devices (Germany)
10. Health Products Regulatory Authority (Ireland)
11. Swedish Medical Products Agency
12. National Authority of Medicines and Health Products (Portugal)
13. Medicines Evaluation Board (The Netherlands)

14. Federal Agency for Medicines and Health Products (Belgium)
15. New Zealand Medicines and Medical Devices Safety Authority
16. Danish Medicines Agency (Denmark)
17. Finnish Medicines Agency (Finland)
18. Spanish Agency for Medicine and Health Products (Spain)
19. National Medicines Institute (Poland)
20. Icelandic Medicines Agency (Iceland)
21. Norwegian Medicines Agency (Norway)
22. Department of Pharmaceutical (Liechtenstein)
23. Swissmedic (Switzerland)
24. South African Health Products Regulatory Authority (RSA)
25. Medicines Control Authority of Zimbabwe (Zimbabwe)
26. Zazibona collaborative procedure

B. FOR GMP INSPECTION PURPOSES

Council may approve or accept a valid GMP compliance certificate or inspection report issue by the following regulatoryauthorities:

1. All the regulatory authorities and organizations stated under A above
2. Regulatory authorities that participate in the Pharmaceutical Inspection Convention and Pharmaceutical Inspection Cooperation Scheme (PIC/s) before 25 October 2008.

Effective date: 10 March 2022

REGISTRAR OF MEDICINES

REGISTRAR OF MEDICINES REPUBLIC OF NAMIBIA