

## Speakers



Dr Peter Bachmann BfArM, Germany



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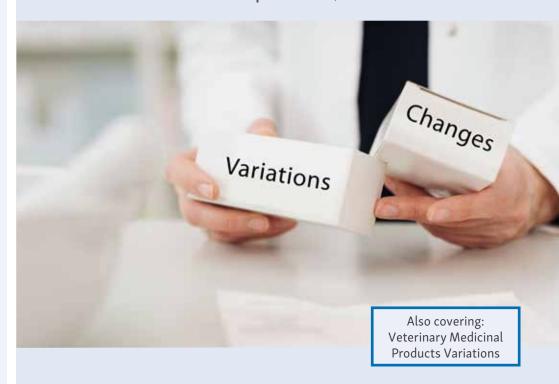
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# Handling Changes and Variations

05/06 November 2025 | Vienna, Austria



# Highlights

- The European Variations Procedure
- The supporting Guidelines on the Categories of Variations and the Operation of the Procedures
- The CMDh Best Practice Guides and Explanatory Notes
- Documenting Variations
- Grouping of Variations
- Classification of Variations
- National, European and Global Changes
- Variations in Packaging
- Changes in ASMFs and CEPs
- ICH Q12: Variations and Lifecycle Management

# Objective

This education course is intended to provide guidance on the provisions laid down in the EU variations regulation and the supporting guideline. You will get to know how the regulation works and you will learn about

- How to efficiently submit and process variations
- Which benefits the supporting guidelines provide and how to use them
- How to handle the complexity of the global supply chain
- How to handle changes in API manufacturing processes
- How to handle changes in packaging material
- How to manage changes in ASMFs and CEPs
- What is, and what is not, an established condition (EC) according to ICH Q12?

Participants will have the opportunity to choose 1 out of 2 parallel workshops dealing with

- Grouping of variations
- Classification of variations (APIs)

# Background

Since 1 January 2010 the Commission Regulation (EC) No. 1234/2008 is binding and directly applicable in all EU member states. It defines the procedure for handling variations to the terms of marketing authorisations. Article 4 of this regulation calls for detailed guidelines explaining the different categories of variations types as well as procedural questions on the documents to be submitted in each case. These Guidelines have been consolidated in one document and published as Chapter 5 of Eudralex Volume 2A (procedures for marketing authorization) in May 2013.

The variations regulation is intended to simplify the handling of the variations procedure and to provide more flexibility in the submission and processing of variations. However, the provisions are of considerable complexity and it is important for API manufacturers and the pharmaceutical industry to be well informed about the latest status of the details of the provisions about handling changes and variations.

Additionally, the final ICH Q12 Guideline for post-approval changes was published in March 2020. The guideline introduces new concepts to facilitate the management of post-approval CMC changes in a more predictable and efficient manner. The new ICH Q12 concepts include, for example, "Established Conditions" (ECs) and "Post-Approval Change Management Protocols" (PACMPs) to extent regulatory flexibility.

Finally, a lot of regulatory work (e.g. variations) needs to be managed due to the Brexit.

# **Target Audience**

The education course is designed for all persons involved in the compilation of pharmaceutical dossiers for marketing authorisations who want to become familiar with the EU variations regulation, in particular for personnel from Regulatory Affairs. Furthermore, the education course will be of interest to personnel from Quality Units, Quality Control and Production of the pharmaceutical and the API industry.

## Programme

#### The European Variations Procedure – an Overview

- Introduction and legal background
- General provisions of the Commission Regulation (EC) No 1234/2008
- Supporting guidelines
- Classification of variations
- Procedural handling of variations
- Grouping and worksharing of variations
- Impact of Brexit
- Conclusion and expectations

#### Veterinary Medicinal Products Variations

- Regulatory basis for variations to veterinary medicinal products - what are the differences to the human provisions
- Two categories of variations:
  - Variations that do not require assessment (VNRA)
  - Variations that do require assessment (VRA)
- Veterinary variation guidance (Classification Guideline)

#### Submission and Processing of Variations – the CMDh Best Practice Guides and Explanatory Notes & ICH Q12

- Best practice guides for the processing of different types of variations
- Best practice guides for the processing of grouped applications
- Best practice guides on worksharing and recommendations on unforeseen variations
- The explanatory notes on how to complete the Variation Application Form
- ICH Q12
  - What is, and what is not, an established condition subject to post-approval change reporting requirements?
  - Expected timelines for ICH Q12 implementation

#### The Complexity of the Global Supply Chain

- The global API supply chain
- How to deal with different expectations
- International collaboration
- Differences between registered processes

#### Grouping of Variations - Case Studies

- Cases for grouping variations according to Article 7 in connection with Annex III of the Commission Regulation
- Possibilities to combine several changes into one single application
- Examples



#### Workshops

- 1. Exercises for grouping of variations
- 2. Exercises for classification of variations API-related changes world wide

# How to manage API Changes in a Multi-Customer Situation using ASMFs or CEPs

- Why would you need to file a change
- Communication with the customers
- Differences between ASMFs and CEPs

#### Handling National, European and Global Changes

- Changes in national applications
- Variations project management
- Starting and processing the notification procedure within Europe
- Changes and variations in the US
- Handling global changes and variations
- Impact of Q8, Q9, Q10, Q12 and PAT

# How to handle Changes in API Manufacturing Processes

- Examples of changes
- How to categorize a change
- What information to provide to whom

#### Variations in Packaging

- Container closure systems of medicinal products
- Packaging materials qualification & specification
- Variations in drug product manufacturing
- Regulatory documentation and strategy

#### ICH Q12 - Variations and Lifecycle Management

- Reasons for variations
- Procedures and classifications
- Type II Variations: time scales
- Extension of an existing marketing authorisation
- Categorisation of new applications versus variation applications
- Established Conditions (ECs) and Post-Approval Change Management Protocols (PACMPs)

# Speakers

#### Dr Peter Bachmann BfArM, Germany



In 1999, Peter Bachmann has joined the Federal Institute for Drugs and Medical Devices (BfArM, Germany), Department of ,Drug Approval'. He was there as Head of the subunit, Variations' responsible for the coordi-

nation and administration of variations to medicinal products. From September 2002 to July 2005 he was Head of the Unit "Mutual Recognition Procedures" at the Department 'European Procedures'. At this time, he was the German representative to the MRFG (Mutual Recognition Facilitation Group). Following the reorganisation of the BfArM in July 2005, Peter Bachmann was appointed as Senior Expert for 'European Drug Regulatory Affairs' at Department 'European and International Affairs' and is the German Member of the CMD(h). He is also the German Member of the NtA, a member of different other European and AdHoc Working Parties, a lecturer for 'Drug Regulatory Affairs' at the Universities of Bonn and Duisburg-Essen.

#### Marieke van Dalen MARA Consultancy, The Netherlands



Marieke van Dalen is a global API regulatory specialist leading her own small consultancy in the Netherlands. Marieke has 38 years of experience in the API industry, always in the regulatory field. Her latest

position was with Aspen API in the Netherlands. She was for a long time a Board member of APIC (the European API organisation) and represented APIC often in meetings and symposia with helath Authorities all around the world.

#### Dr Josef Hofer exdra GmbH, Germany



Dr Josef Hofer is Managing Director of EXDRA GmbH (Excellence in Drug Regulatory Affairs). Working for and in international pharmaceutical industry since 1980. Dr Hofer holds a lectureship at the University

in Bonn for Drug Regulatory Affairs.

#### Dr Wilhelm Schlumbohm Berlin, Germany



Dr Schlumbohm worked 30 years with German drug licensing authorities. He was an expert for the Certification Procedure of the European Pharmacopoeia and a member of the TAB for several years. He was

also a member of the ASMF working group, and the CVMP coopted member for quality. He is a pharmacist, holds a Ph D in biochemistry, and is further qualified as pharmacist for drug information and for public health.

### Social Event



In the evening of the first course day you are cordially invited to a social event. This is an excellent opportunity to share your experiences with colleagues from other companies in a relaxed atmosphere.

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