REPUBLIC OF LEBANON
MINISTRY OF PUBLIC HEALTH

Reclassification of post marketing changes (Variations) For Imported Drugs

إعادة تصنيف التغيرات ما بعد التسويق للأدوية المستوردة

28 March 2014

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Outline

REPUBLIC OF LEBANON
MINISTRY OF PUBLIC HEALTH

- Introduction
- Variation's Types according to decree 571/2008
- Comparison between current and suggested classification of Variations Type I for Imported Drugs
- Comparison between current and suggested classification of Variations Type II for Imported Drugs
- Conclusion

Outline

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Introduction

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Efforts have been made by the MOPH in order to update texts related to the Registration of drugs

Many laws and decrees have been promulgated in order to organize it

In Lebanon, back to 2003 and concerning Drug Registration:

Law 530/2003 شروط تسجيل واستيراد وتسويق وتصنيف الأدوية

Applicative Decree 571/2008

تطبيق أحكام المادتين الثالثة والخامسة من القانون رقم530 والمواد ٥٢ و ٥٣ و ٥٤ و ٦٠ من قانون مزاولة مهنة الصيدلة ٣٦٧

Introduction

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Decree 571/2008:

- Identification and Classification of Post Marketing Changes related to already registered Imported and Locally Manufactured Drugs into two types:

Variations Type I and II

- Method of notification and approval required by the MOPH.

Introduction

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To fill the gaps detected after several years of implementation

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To align with the international classifications:

- Review the current classification of Variations
- Prepare a new classification technically and structurally inspired by several international guidelines especially WHO Guidance on Variations
- Update the documents required for each of these Variations in the new classification

Introduction

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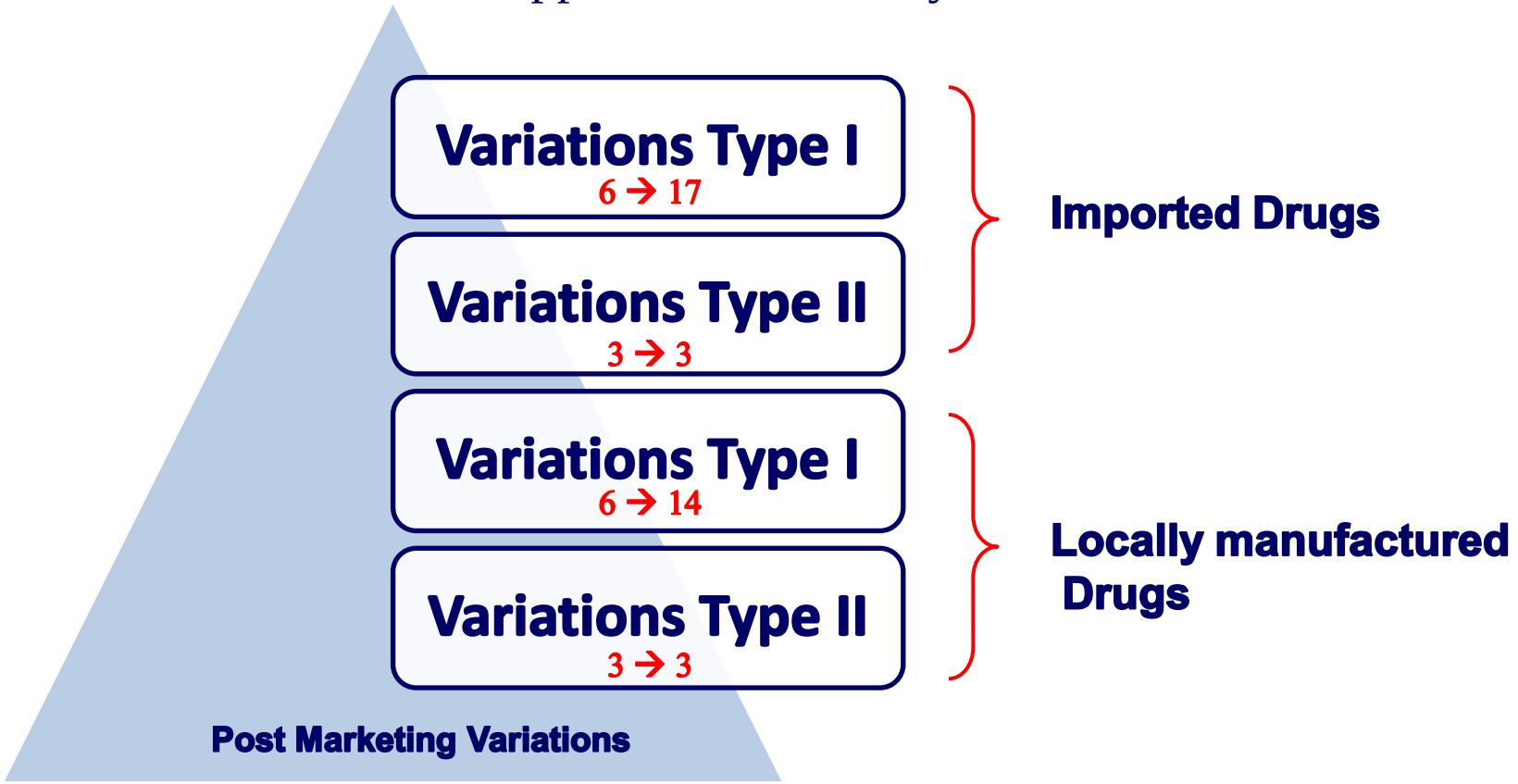
- New Variations are added
- Some old Variations are either deleted or modified
- Some Variations make a new application necessary



Based on WHO recommendations and guidelines

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Type I Variations

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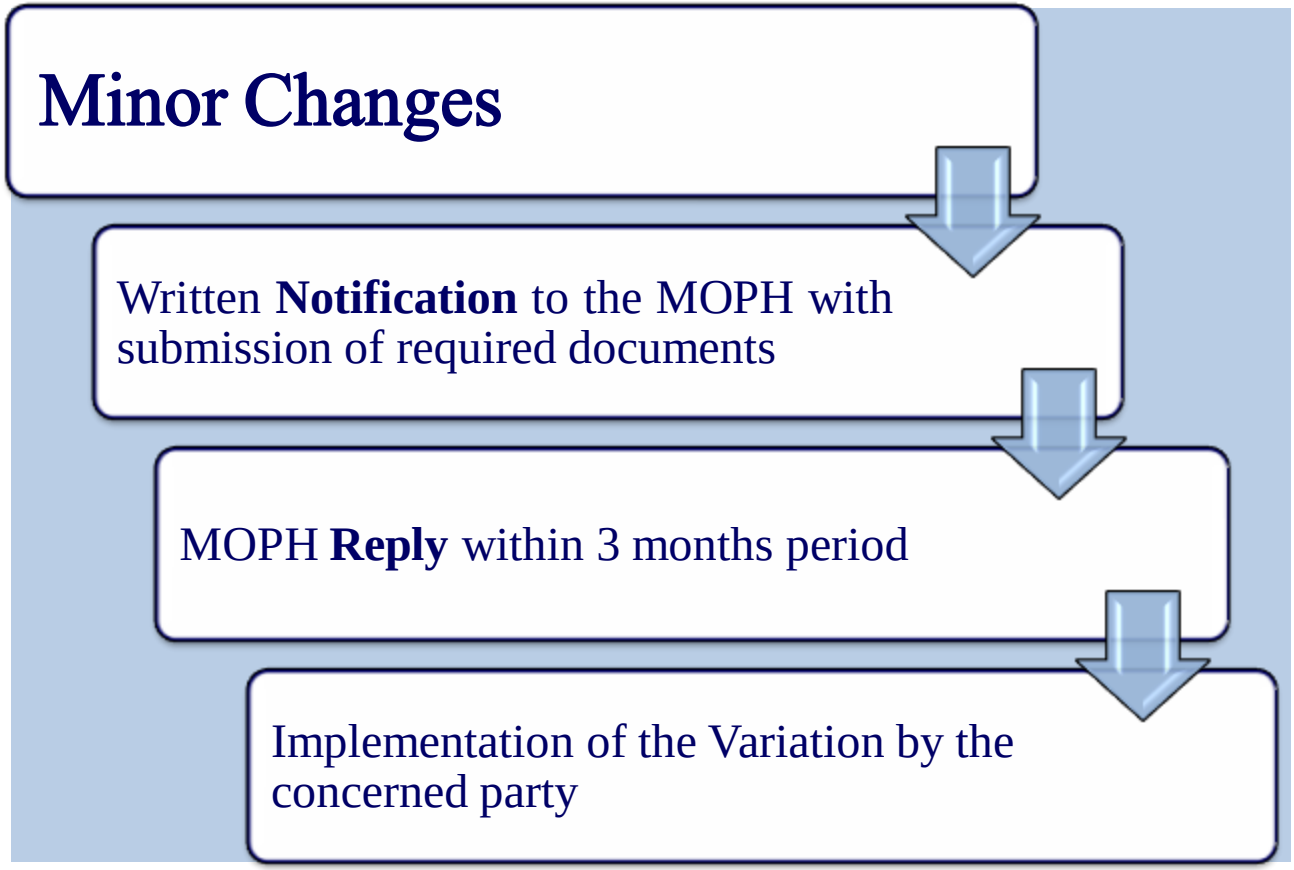

Type II Variations

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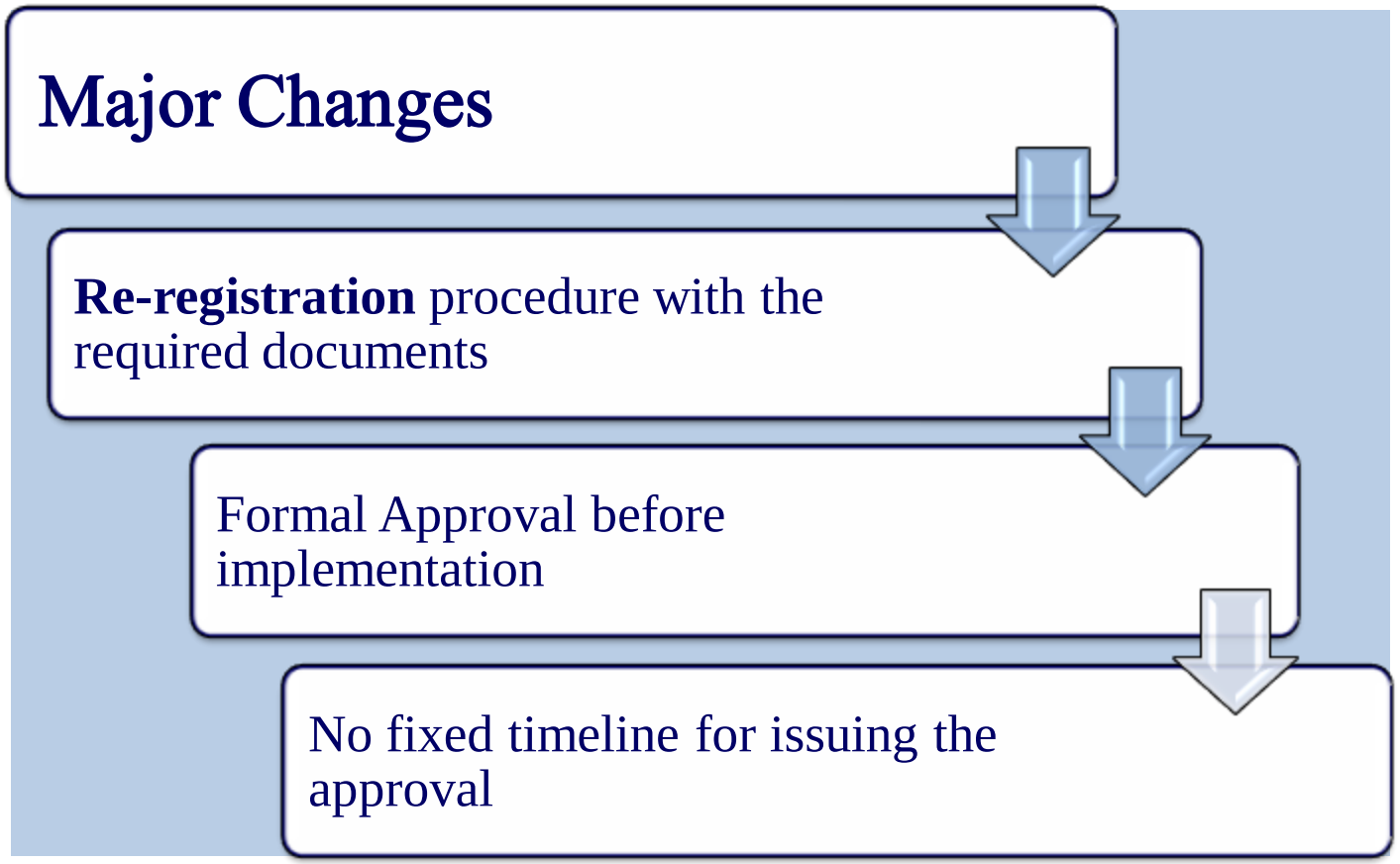

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Number of Variations

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Current Variation Classification	Suggested Variation Classification
• **6 Type I Variations**	• **17 Type I Variations**

Comparison between current and suggested variations Type I

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Frequent requested documents

- **Statement issued by the "RP"** certifying that no change occurred in the technical specifications of the registered products.

OR

- **Statement issued by the "RP"** regarding the change

- 2 Original specimens and their related COA are requested otherwise **Mock ups** and commitment letter to submit final samples before importation of the product after approval granted by MOPH.

Comparison between current and suggested variations Type I

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Variation Title

Current	*Suggested*
Change in the name of the product without any other changes in its basic characteristics تغيير أسم المستحضر دون أي تعديل في مواصفاته الأساسية	**1. Change or addition in the trade name of the product without any other changes in its basic characteristics** تغيير (أو اضافة) أسم المستحضر دون أي تعديل في مواصفاته الأساسية

Documents related to pricing if the new product comes in addition to the old one

Comparison between current and proposed variations Type I

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Variation Title

Current

Change the name of the "Responsible party" without any other change

تغيير أسم "الجهة المسؤولة" دون أي تعديل آخر

Suggested

2. Change in the name, address and/or office address of any of the parties involved in the manufacturing of the Finished Product

تغيير اسم، عنوان و/او عنوان مكتب لاي من الجهات المشاركة في تصنيع المستحضر النهائي

For the parties involved in the manufacturing of the Finished Product

- Statement issued by the "RP" certifying that the change is limited to the name, address and /or office address of the concerned party and there is **no change in the physical address** of the manufacturing site

Comparison between current and suggested variations Type I

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Variation Title	
Current	Suggested
Change one of the Plants which participate in the process of manufacturing to any other reference countries without changing the "Responsible Party" or the "Mother Company" تغيير احد المصانع المشاركة في التصنيع الى بلد من "بلدان المرجعية" دون تغيير "الجهة المسؤولة" او "الشركة الام"	4. Change in one of the factories participating in the production of the registered product to a country among the reference countries without changing the responsible party تغيير احد المصانع المشاركة في تصنيع المنتج المسجل الى بلد من "بلدان المرجعية" دون تغيير "الجهة المسؤولة"

- Plant profile of the new factory if not previously submitted to MOPH
- Documents related to pricing

Comparison between current and suggested variations Type I

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Variation Title

Current

Change in the origin of raw materials / Addition of a new source

تغيير أو تعدد في منشأ المواد الأولية

Suggested

5. Addition of new (or replacement) Drug Substance Manufacturer

اضافة (أو استبدال) مصنع جديد للمواد الفعالة

- COA for the DS from the new DS manufacturer and from the manufacturer of the FP.
- COA for the FP from the manufacturer of the FP corresponding to a batch obtained with the drug substance from the new manufacturer.

Comparison between current and suggested variations Type I

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Variation Title	*New Variation*
6.Change in the ATC Code (Anatomical Therapeutic Chemical Classification)	**تغيير في رمز نظام تصنيف الادوية الكيميائي العلاجي التشرحي**

Copy of **Proof of Acceptance** issued by WHO

Comparison between current and suggested variations Type I

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Variation Title

New Variation

7. Change in the name, address and/ or office address of one of the manufacturers of the Drug Substance

تغيير اسم، عنوان و/او عنوان مكتب لاحد مصنعي المادة الفعالة

- **Statement issued by the "RP"** certifying **that no change in the physical address** of the manufacturing site
- **Statement issued by the Drug Substance Supplier** mentioning the new name and/or address of the manufacturing site

Comparison between current and suggested variations Type I

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Variation Title

New Variation

8. Change in the Re-Test Period/or Storage Conditions of the Drug Substance

تغيير في مدة اعادة الاختبار و/او شروط حفظ المادة الفعالة

Stability Study for the Drug Substance according to ICH Guidelines

Comparison between current and suggested variations Type I

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Variation Title	
Current	Suggested
Change in the pack size of the registered product تغيير في حجم العبوة	9. Change (or addition) in the pack size (number of units in the pack) of the Registered Product تغيير(أواضافة) في حجم العبوة :عدد الوحدات داخل العبوة

Documents related to pricing

Comparison between current and suggested variations Type I

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Variation Title

Current	*Suggested*
Change in the primary packaging material تغيير في التوضيب الاولي	**10. Change in the primary packaging of the Finished Product** تغيير في التوضيب الاولي للمستحضر النهائي

Comparison between current and suggested variations Type I

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Variation Title

New Variation

11.Change in the Design

تغيير في تصميم العبوة

Comparison between the current and suggested design

Comparison between current and suggested variations Type I

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Variation Title

New Variation

12. Reduction of the Shelf life of the Finished Product

تقليص مدة صلاحية المستحضر النهائي

- Stability Study for the Finished Product as per ICH Guidelines
- CPP or FSC showing the new Shelf life
- Copy of Finished Product Specifications mentioning the new Shelf life

Comparison between current and suggested variations Type I

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Variation Title

New Variation

13. Extension of the Shelf life of the Finished Product

تمديد مدة صلاحية المستحضر النهائي

- Stability Study for the Finished Product as per ICH Guidelines
- CPP or FSC showing the new Shelf life
- Copy of Finished Product Specifications mentioning the new Shelf life

Comparison between current and suggested variations Type I

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Variation Title

New Variation

14.Change in the Storage Conditions of the Finished Product

تغيير في شروط تخزين المستحضر النهائي

- Stability Study for the Finished Product as per ICH Guidelines
- CPP or FSC with the new Storage Conditions
- Copy of Finished Product Specifications mentioning the new Storage Conditions

Comparison between current and suggested variations Type I

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Variation Title

New Variation

15. Change in the Manufacturing Process of the Finished Product

تغيير في طريقة تصنيع المستحضر النهائي

- The overall **Manufacturing Principle** remains the same and that the new process leads to an **identical product** regarding all aspect of Quality, Safety and Efficacy.
- Table comparing the current manufacturing process and the new manufacturing process
- Stability study for the FP obtained with the new manufacturing process
- COA for the FP obtained with the new manufacturing process

Comparison between current and suggested variations Type I

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Variation Title

New Variation

16. Change in the Specifications and/or Method of Analysis of Finished Product

تغيير في المواصفات و/أو طريقة التحليل للمستحضر النهائي

- Comparative table between old and new Specifications
- New Method of Analysis in comparison to old one
- Copy of Finished Product new Specifications

Comparison between current and suggested variations Type I

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Variation Title

New Variation

17. Leaflet Content Update

تحديث النشرة الدّاخليّة

- Updated Summary of Product Characteristics SmPC
- Published literatures of the studies covering the new additions
- Comparison table between the current and suggested leaflet

Comparison between current and suggested variations Type I

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Variation Title

Current = Cancelled

A secondary change in the Pharmaceutical form, from tablets to capsules or others

تغيير ثانوي في الشكل الصيدلاني
من حب إلى كابسول و ما شابه

New Application necessary for any changes to the Pharmaceutical Dosage Form

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Number of Variations

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Current Variation Classification	Suggested Variation Classification
• 3 Type II Variations	• 3 Type II Variations

Comparison between current and suggested variations Type II

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Variation Title Current	Suggested
Change in the Responsible Party and/or Mother Company تغيير " الجهة المسؤولة" و/او "الشركة الام"	**Change in the Responsible Party** تغيير " الجهة المسؤولة"

GMP certificate of the new factory (if applicable)

Comparison between current and suggested variations Type II

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Variation Title Current	Suggested
Change in one of the manufacturers participating in the manufacturing process to a country different from the "Reference Countries" without changing the "Responsible party" or the "Mother Company". تغيير احد المصانع المشاركة في التصنيع الى بلد خارج "بلدان المرجعية" دون تغيير "الجهة المسؤولة" و "الشركة الام	Change in one of the manufacturers participating in the production of the registered product, to a country out the reference countries, without changing the Responsible Party تغيير احد المصانع المشاركة في تصنيع المستحضر المسجل الى بلد خارج "بلدان المرجعية" دون تغيير "الجهة المسؤولة"

GMP certificate of the new factory

Comparison between current and suggested variations Type II

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Variation Title	
Current	Suggested
Change the dosage of the product تغيير في عيار العبوة	Change and or addition of a Strength تغيير (أو اضافة) في عيار العبوة

- Statement issued by the RP certifying that there is no change in the factories involved in the manufacturing of the product
- For innovators, Data demonstrating the efficacy in case of lower strength and the safety in case of higher strength
- Documents related to pricing

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Conclusion: What's Next?

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- The new classification was reviewed by the Technical Committee and was amended according to their remarks

- The new classification will be sent to the private parties: LPIA, OPL and all Concerned Parties for remarks and comments.

- According to the resolution No. 1638/2013, a legal text related to the new classification including all suggested changes will be prepared by a special committee

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Thank You!