# Post Approval Changes Management

**Cleber Gomes**
Regulatory Affairs Manager
Instituto Butantan

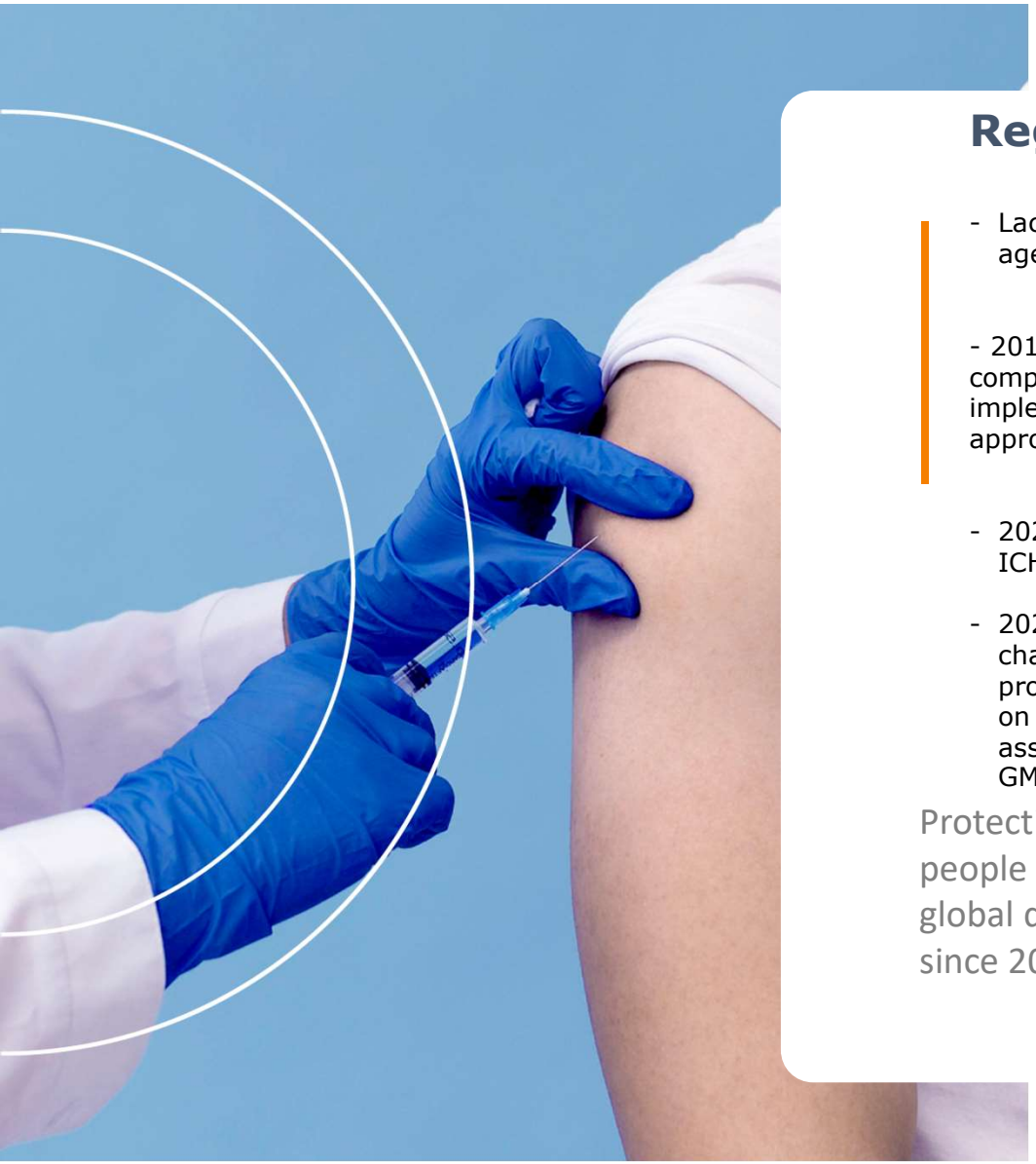
**Monique Cruz**
Regulatory Affairs Substitute Manager
Bio-Manguinhos/Fiocruz

DCVMN INTERNATIONAL
Developing Countries Vaccine Manufacturers Network International

# Situation in Brazil

Protecting people from global diseases since 2000.

DCVMN INTERNATIONAL
Developing Countries Vaccine Manufacturers Network International



# Regulatory Background

- Lack of harmonization/ alignment among the global drug regulatory agencies.

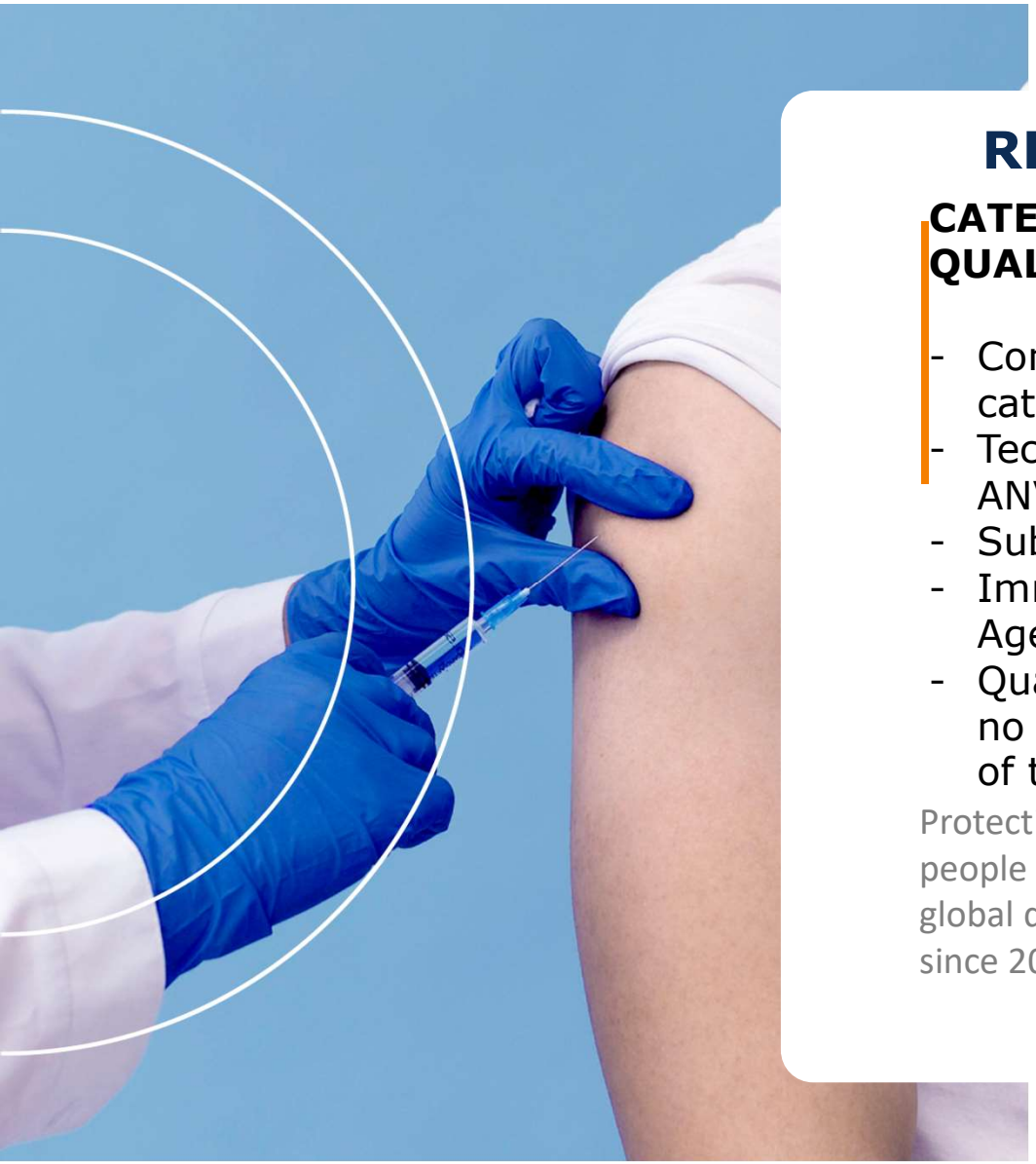
- 2011: RDC 49/2011 - categorized changes into three levels according to complexity: level 1 changes do not require prior approval from Anvisa for implementation, while levels 2 and 3 can only be implemented after approval by the Agency and risk analysis as a tool.

- 2020: RDC 413/2020 and IN 65/2020 - PAC legislation close to the ICH and WHO Guidelines (TRS 993- Annex 4 and TRS 1011- Annex 3).

- 2020: Change classification based on the potential effect of the quality change and on the potential impact on the safety or efficacy of the product. In addition, there are administrative changes with no impact on safety, efficacy and quality of the finished product. Therefore, no assessment is needed, and the company can implement the change. GMP documents (if impacted) can be reviewed during GMP inspections.

Protecting people from global diseases since 2000.

DCVMN INTERNATIONAL
Developing Countries Vaccine Manufacturers Network International



# RDC 413/2020 and IN 65/2020

## CATEGORIES: MINOR, MODERATE OR MAJOR QUALITY CHANGES

- Compliance with technical conditions for correct categorization
- Technical documentation to be presented to ANVISA
- Submission: dossier or Product Change History
- Immediate implementation (minor) or prior Agency´s approval (moderate or major).
- Quality change without impact: change that has no impact on the quality, safety or effectiveness of the product;

Protecting
people from
global diseases
since 2000.

DCVMN
INTERNATIONAL
Developing Countries Vaccine
Manufacturers Network International

**2002**

First resolution regarding licensing/BP
RDC nº 80/2002 - "Registration, Changes and Post-Registration Inclusion and Revalidation"

**2005**

Licensing and Post Licensing/BP
RDC nº 315/2005 "Registration, Post-Registration Changes and Revalidation"

**2010**

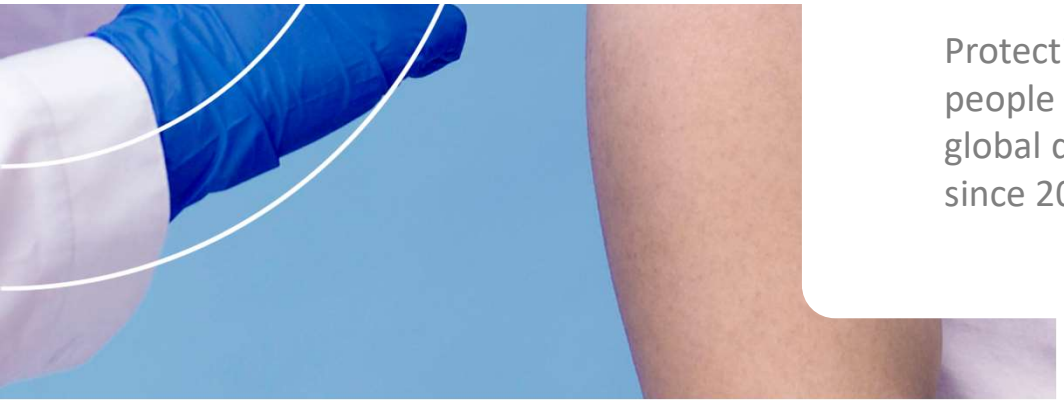
Licensing/BP
RDC 55/2010

**2011**

Post Licensing and Stability Studies/BP
RDC 49/2011 and RDC 50/2011

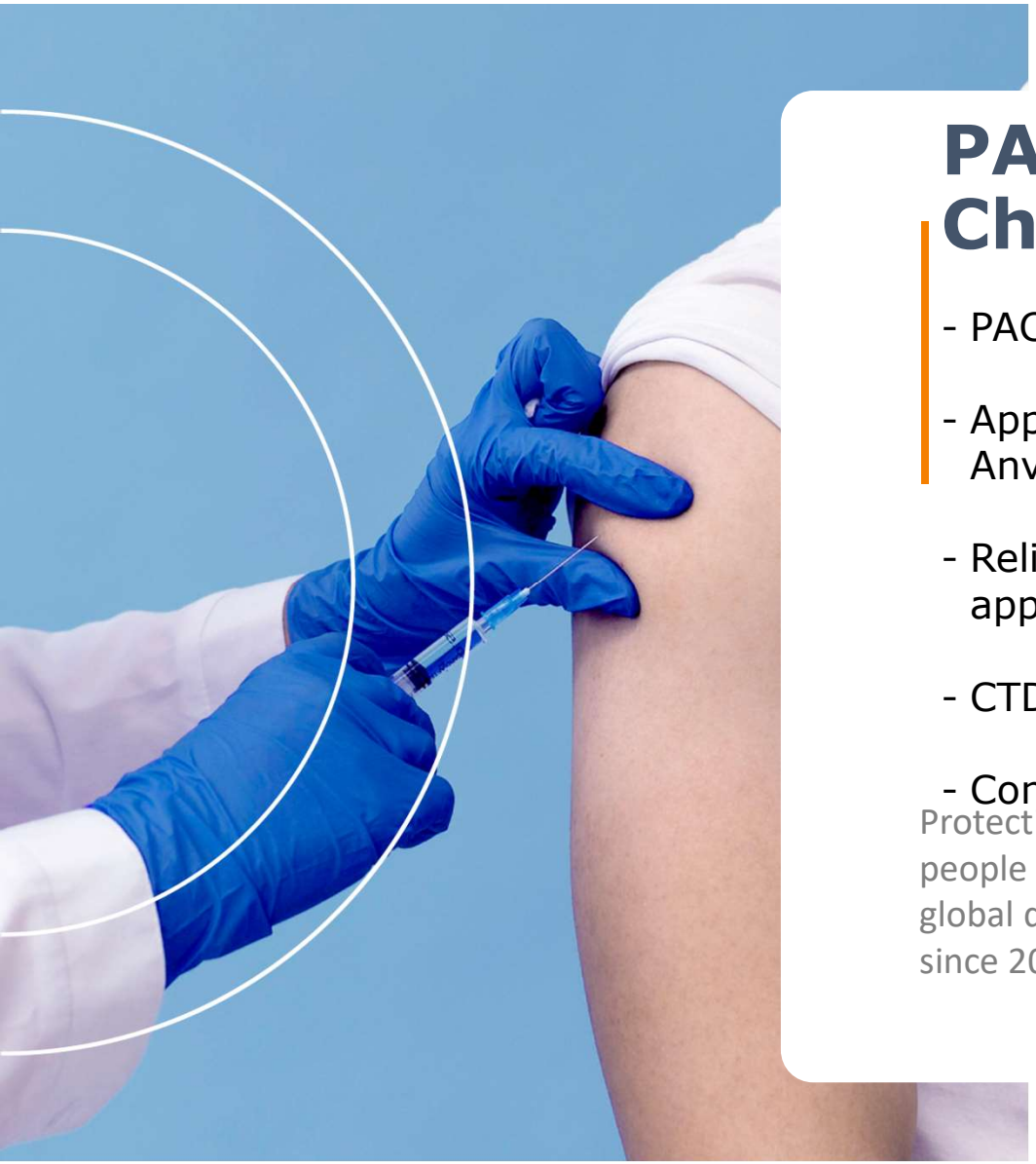
**2020**

Post Licensing and Stability Studies/BP
RDC 413/20 / IN 65/20 and RDC 412/20



Protecting people from global diseases since 2000.

DCVMN
INTERNATIONAL
Developing Countries Vaccine Manufacturers Network International



# PAC Management - Challenges

- PAC classification harmonization.

- Approval time for changes that depend on Anvisa's analysis

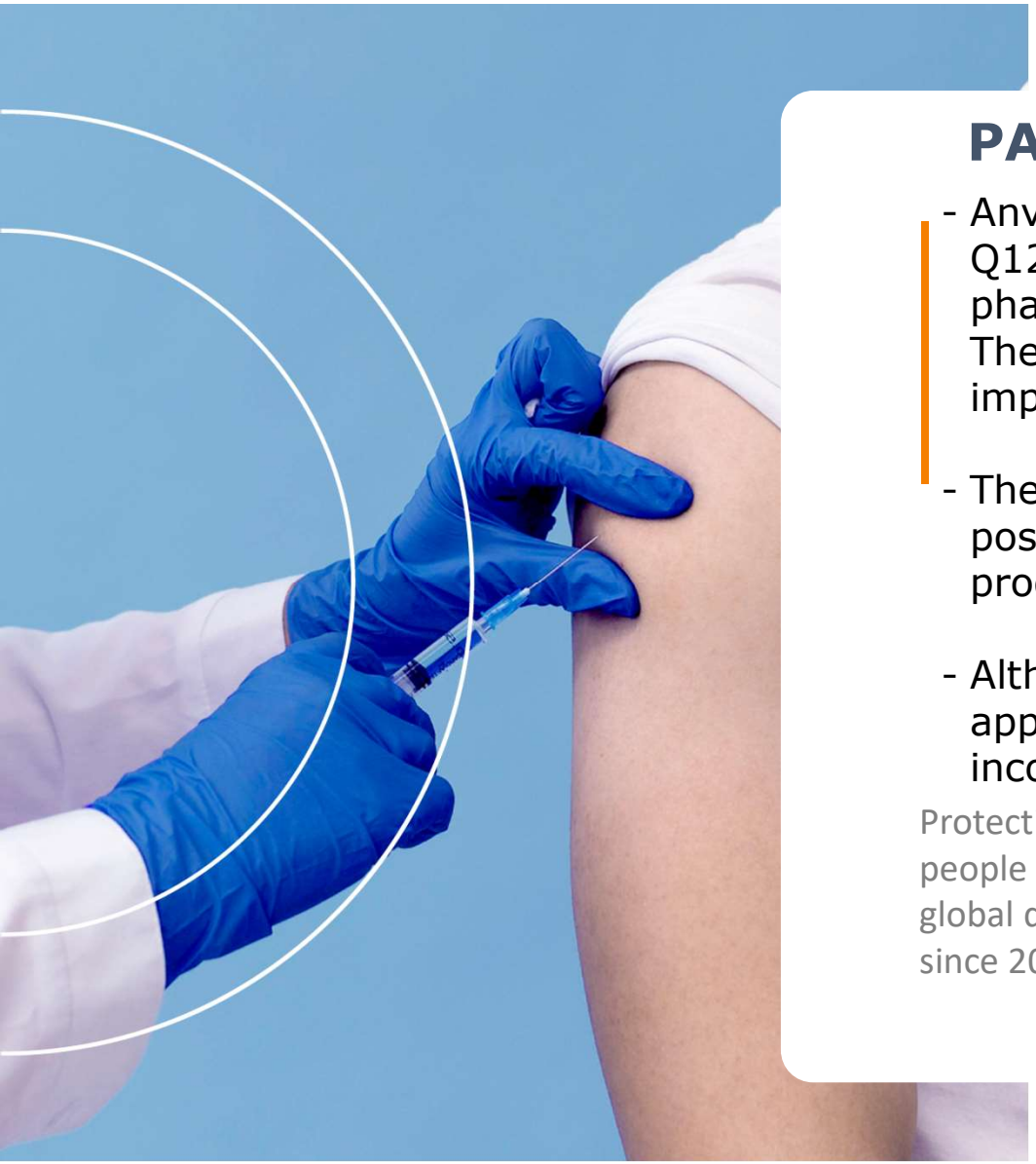
- Reliance on post-approval changes already approved by reference regulatory agencies.

- CTD format implementation.

- Comparability study.

Protecting
people from
global diseases
since 2000.

DCVMN
INTERNATIONAL
Developing Countries Vaccine
Manufacturers Network International



# PAC Management - Next Steps

- Anvisa is working on the implementation of ICH Q12 (Technical and regulatory considerations for pharmaceutical product lifecycle management). There is still a lack of planning for the implementation for biological products.

- The guide will have an impact on licensing and post-licensing resolutions for drugs and biological products.

- Although draft ICH Q12 guideline is a different approach to the WHO guideline, they are not incompatible, they are complementary.

Protecting
people from
global diseases
since 2000.

DCVMN
INTERNATIONAL
Developing Countries Vaccine
Manufacturers Network International

# Thank You!
# Obrigado!

**Cleber Gomes**
Regulatory Affairs Manager
Instituto Butantan

**Monique Cruz**
Regulatory Affairs Substitute Manager
Bio-Manguinhos/Fiocruz

Protecting
people from
global diseases
since 2000.

DCVMN
INTERNATIONAL
Developing Countries Vaccine
Manufacturers Network International