Variation dossier submission

All variation documentation must be submitted using the CTD format.

Type IA/IB Variation Applications and their supportive documentation

Module 1:

Where a cover letter is provided it should be placed in Module 1, ***1.0 Cover Letter***. Cover letter should contain date on variation implementation. Comparative table of current and proposed data should be organised as Annex for the Cover letter.

The checklist of conditions to be fulfilled and documentation to be supplied, i.e. the extract of the relevant page from the *Variation Guideline*, should be placed in ***1.2 Application Form*** after the Application Form itself.

Documents should be assigned, wherever possible, to the relevant CTD section, primarily within Module 3 Quality and ***1.3.1 Summary of Product Characteristics, Labelling and Package Leaflet***. These would include replacement sections and additional information.

Where documents cannot be assigned to specific CTD-defined locations then they should be organised as Annex for the Cover letter. These might include declarations, certificates, justifications etc.

1.20 Assessment report of the reference competent authority[1] (applicable only for the simplified national registration procedure). Documents appended to the report – specifications, original SmPC and Package Leaflet and their translated[2] versions (if not in English language) should be included in appropriate sections of the registration dossier.

Type II Variation Applications and their supportive documentation

Module 1:

1.0 Cover Letter

Cover letter should contain date on variation implementation.

[1] Reference competent authority – ICH member states medicines regulatory authority and, in the case of pre-qualification, WHO.

[2] It is necessary to submit notarized translations and, in the case of the Member States of the Hague Convention, also approved by the Apostille

1.1 Comprehensive Table of Contents

1.2 Application Form

1.3 Product Information

1.3.1 SmPC, Labelling and Package Leaflet (electronic versions in Microsoft Word format, where appropriate)

1.3.4 Consultation with Target Patient Population (e.g. in case of significant changes)

1.3.6 Braille (when Braille is implemented for an already authorised medicinal product as part of a variation)

1.4 Information about the Experts:

The relevant expert declaration(s) and signature(s) must be provided, corresponding to the Overview/Summary submitted in Module 2. In cases where MAHs wish to distinguish this declaration from any previous declarations, the variation procedure number (if applicable) may be included on top.

1.8.1 Pharmacovigilance system (e.g. in case of changes), where appropriate (electronic version in PDF format)

1.8.2 Risk Management System (electronic version in PDF format)

1.9 Information relating to clinical trials (in case clinical trials supporting the variation application)

1.20 Assessment report of the reference competent authority[3] (applicable only for the simplified national registration procedure). Documents appended to the report – specifications, original SmPC and Package Leaflet and their translated[4] versions (if not in English language) should be included in appropriate sections of the registration dossier.

Module 2:

As mentioned in the Variation Guideline any Type II variation should be accompanied by the relevant Overviews/Summaries updates or addenda (even if a variation is submitted at

[3] Reference competent authority – ICH member states medicines regulatory authority and, in the case of pre-qualification, WHO.

[4] It is necessary to submit notarized translations and, in the case of the Member States of the Hague Convention, also approved by the Apostille.

the request of the Regulatory Authority). Expert details and signature are to be provided in Module 1.4 separated from the actual Overview/Summary.

Module 3, 4, 5:

Supportive data are to be included in Modules 3, 4 and/or 5 as appropriate and in accordance with the EU-CTD structure.

Variation of an ASMF:

If a change concerns a section of an ASMF, the documentation for this change must be submitted in the CTD-format.

The corresponding variation has to be submitted by the MAH.