REQUIREMENT FOR POST APPROVAL CHANGING IN INDONESIA

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Summary of GMP Compliance Qualification Process in "your Country or Region"

Question1: ***Among the following proposed change cases "1-4", which case requires "a-c" for GMP qualification of the related manufacturing sites (Yes or No)?***

Assumption: For small molecule API change, proposed change would not create new impurity

(*) Additional document includes Process validation report, copies of analytical raw data, batch record, and submission of GMP certificate at the time of change submission

Change cases and requirements	1) Change of Manufacturing process	2) Change of Test Methods	3) Change of Manufacturing sites	4) Change of Packaging
a) Requirement of on-site inspection	For API: Yes/ No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No
b) Additional documents(*)	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No
c) Review period is longer than 6 months	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No

Please describe other comments on the GMP compliance qualification process (if any).

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Summary of Stability study documents required for the variations in "your Country/ Region"

Question2: ***For the following proposed change cases "1 – 4", does your agency requires to submit stability data at the time of change proposal (Yes or No) ?***

Assumption: For small molecule API change, proposed change would not create new impurity.
For small molecule DP change, API process/site remains the same as original submission.

Change cases and requirements	1) Change of Manuf. process	2) Change of Test Methods	3) Change of Manuf. sites	4) Change of Packaging
a) Real time stability data is required.	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No
b) NLT 6 months data is required for long term stability.	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No
c) Stability Commitment can be applied.	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No
d) Bracketing / Matrixing approach is acceptable.	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No	For API: Yes / No For DP: Yes / No

Any other comments regarding the stability data requirements (if any)

- *Change of test method that resulted change of specification requires real time stability data.*
- *Change of primary packaging require real time stability data (6 mo at submission), but not for change of secondary packaging.*

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Question 3: Please describe required documents in the following variations.

Change of manufacturing process		
Classification	Required documents	Detailed Requirements
Chemical Drug Products	Manufacturing methods	(1) Description on the manufacturing process change, including the IPC. (2) Process validation of drug product manufacturing.
	Spec and test method	(1) Specification of release and shelf life for drug product, (2) Validation/verification of analytical method report for spec and test method (if changed), (3) Comparability of batch analysis of new process and previous process (min 3 batches).
	Stability studies	(1) 6M data (accelerated), and (2) 6M data and declaration to continue up to shelf life (long term)
	Bioequivalence studies	Requires for (1) different API manufacturer (considering the BE classification requirement) and (2) for changes that affect to impurities and/or assays specification.
	Others	
Notes: The above requirements for change of manufacturing process without change site.		

Question 3: Please describe required documents in the following variations.

Change of manufacturing process		
Classification	Required documents	Detailed Requirements
Biological Drug Products	Manufacturing methods	(1) Description on the manufacturing process change, including the IPC. (2) Process validation of drug product manufacturing.
	Spec and test method	(1) Specification of release and shelf life for drug product, (2) Validation report for spec and test method (if changed), (3) Comparability of batch analysis of new process and previous process (min 3 batches).
	Stability studies	(1) 6M data (accelerated), and (2) 6M data and declaration to continue up to shelf life (long term).
	Bioequivalence studies	No required for biological drug products.
	Others	- No change in impurities and/or physicochemical natures. - Change does not give negative impact to the reproducibility of process . - Change does not the impact of any unintended result during manufacturing process or stability defect.
Notes:		

Question 3: Please describe required documents in the following variations.

Change (Addition) of manufacturing site (by the same manufacturing process)		
Classification	Required documents	Detailed Requirements
Chemical Drug Products	Manufacturing methods	(1) Description on the manufacturing process change, including the IPC. (2) Process validation of drug product manufacturing.
	Spec and test method	(1) Specification of release and shelf life for drug product, (2) Validation/verification of analytical method, (3) Comparability of batch analysis of new site and previous site (min 3 batches).
	Stability studies	(1) 6M data (accelerated), and (2) 6M data and declaration to continue up to shelf life (long term)
	Bioequivalence studies	For API requires BE study.
	Others	(1) Comparability of drug dissolution test profiles of new site and previous site (for oral solid dosage form), (2) labeling information included the new information of new site production.
Notes:		

Question 3: Please describe required documents in the following variations.

Change (Addition) of manufacturing site (by the same manufacturing process)		
Classification	Required documents	Detailed Requirements
Biological Drug Products	Manufacturing methods	(1) Description on the manufacturing process change, including the IPC. (2) Process validation of drug product manufacturing.
	Spec and test method	(1) Specification of release and shelf life for drug product, (2) Validation/verification of analytical method, (3) Comparability of batch analysis of new process and previous process (min 3 batches).
	Stability studies	(1) 6M data (accelerated), and (2) 6M data and declaration to continue up to shelf life (long term).
	Bioequivalence studies	No required for biological drug products.
	Others	- No change in impurities and/or physicochemical natures. - Change does not give negative impact to the reproducibility of process . - Change does not the impact of any unintended result during manufacturing process or stability defect.
Notes: If change impact to the impurities and/or physicochemical of drug, comparability non clinical and/or clinical study may be required.		

Question 3: Please describe required documents in the following variations.

Formulation Change or Addition of packaging		
Classification	**Required documents**	**Detailed Requirements**
Chemical Drug Products (Formulation Change- change of excipients)	Manufacturing methods	(1) Description on the manufacturing process, including the IPC. (2) Process validation of drug product manufacturing.
	Spec and test method	(1) Specification of release and shelf life for drug product, (2) Validation of analytical method report for spec and test method (if changed), (3) Comparability of batch analysis of drug product between new formulation and previous formulation (min 3 batches), (4) specification and analytical method for excipients.
	Stability studies	(1) 6M data (accelerated), and (2) 6M data and declaration to continue up to shelf life (long term).
	Bioequivalence studies	May be required (if the formulation change indicate safety and efficacy change)
	Others	Pharmaceutical development (justification of change), batch formulation.
Chemical Drug Products (addition packaging)	Manufacturing methods	(1) Description on the packaging manufacturing process, including the IPC. (2) packaging/filling validation (if type of packaging change, eg: blister to strip; blister to bottle) .
	Spec and test method	Comparability of batch analysis of drug product between new and previous packaging (min 3 batches).
	Stability studies	(1) 6M data (accelerated), and (2) 6M data and declaration to continue up to shelf life (long term).
	Bioequivalence studies	No required.
	Others	GMP certification (if using new packaging site).

Question 3: Please describe required documents in the following variations.

Formulation Change or Addition of packaging		
Classification	Required documents	Detailed Requirements
Biological Drug Products (Formulation change)	Manufacturing methods	(1) Description on the manufacturing process, including the IPC. (2) Process validation of drug product manufacturing.
	Spec and test method	(1) Specification of release and shelf life for drug product, (2) Validation of analytical method report for spec and test method (if changed), (3) Comparability of batch analysis of drug product between new formulation and previous formulation (min 3 batches), (4) specification and analytical method for excipients (including physicochemical impurity profiles).
	Stability studies	(1) 6M data (accelerated), and (2) 6M data and declaration to continue up to shelf life (long term).
	Bioequivalence studies	Not required
	Others	New Batch formulation vs previous batch formulation, rationale of change.
Biological Drug Products (addition of packaging)	Manufacturing methods	(1) Description on the packaging manufacturing process, including the IPC. (2) packaging/filling validation (if type of packaging change, eg: vial to ampoule) .
	Spec and test method	Comparability of batch analysis of drug product between new and previous packaging (min 3 batches).
	Stability studies	(1) 6M data (accelerated), and (2) 6M data and declaration to continue up to shelf life (long term).
	Bioequivalence studies	Not required
	Others	GMP certification (if using new packaging site).