



Australian Government

Department of Health

Therapeutic Goods Administration

Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data

Appendix 2: Variation types – biological medicines

Version 3.0, July 2019

TGA Health Safety
Regulation



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Introduction

The Therapeutic Goods Administration (TGA) takes a risk-based approach to assessing variations to prescription medicines. This means that the higher the risk associated with the variation, the greater the level of assessment required by the TGA before a decision can be made.

This guidance outlines the following types of variations and changes that can be made to [biological medicines](#) currently on the Australian Register of Therapeutic Goods (ARTG) and is split into two parts:

[Part 1: Corrections, notifications and quality information changes](#)

- Changes that do not require prior approval. These are:
 - changes that can be implemented without informing the TGA and
 - changes that can be implemented before you inform the TGA of the change.
- Corrections to an ARTG entry – a minor change to correct or complete information that was inadvertently recorded incorrectly or omitted in the ARTG entry, including the product information (PI).
- Notifications – very low risk variations with specific conditions. TGA approval for these variations is made automatically upon lodgement and payment of the application. The applicant must provide legal assurances that all conditions are met and submit supporting data using the approved electronic form.
- Self-assessable requests (SARs) – lower risk variations for which the sponsor can provide an assessment of their own data for the TGA to verify, including to the PI.
- Category 3 requests – variations that require evaluation of quality-related data only. These variation types are intended as representative types, where a summary of the exact changes being requested is included the cover letter. Includes changes to quality aspects of the PI.

[Part 2: Product information \(PI\) changes](#)

- Minor editorial changes to product information (MEC).
- Safety related requests (SRRs) – requests to either reduce the patient population that can receive the medicine or add a warning or precaution.

Category 1 applications are not covered by this guidance. These require evaluation of a full dataset, or any combination of quality, nonclinical, clinical and bioequivalence data. See the [Prescription medicines registration process](#) for information on how to lodge a Category 1 application.

See also:

- [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#)
- For changes to chemically derived prescription medicines see [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Appendix 1: Variation types – chemical entities](#).

Data supporting variation requests

The conditions outlined within each variation type set out the minimum documentation required for regulatory purposes, but depending on the particular circumstances surrounding the change, additional data may be needed. Additional data may also need to be generated to meet requirements under [Good Manufacturing Practice](#).

Refer to each type of change for full data requirements.

Index of variation types — biological medicines

Code	Description	Variation category	Requires update to ARTG data ¹
Part 1: Corrections, notifications and quality information changes			
Cell bank or seed lot changes			
CSNW	Cell bank or seed lot — addition of a new working cell bank or working seed lot	SAR	
CSSS	Cell bank or seed lot — change of storage site of master or working cell bank or seed lot	SAR	
CBSL	Cell banks or seed lots — changes	Category 3	
Drug substance or excipient changes			
	Drug substance and excipients — change to local handling agent contact details (including material of biological origin)	Does not require reporting to the TGA	
CAAO	Correct an ARTG entry — animal origin	Correction	Formulation
CAFC	Correct an ARTG entry — formulation	Correction	Formulation
ISAM	Drug substance and excipients specifications — change of test method	Notification	
ISNL	Drug substance and excipients specifications — narrowing of limits	Notification	
ISPT	Drug substance and excipients specifications — amendments resulting from pharmacopoeial or TGO changes	Notification	
IMRS	Drug substance and excipients manufacture (from Category IC ruminant tissues) — changes in source (from animal to non-animal) and/or manufacturing process or site	SAR	Formulation

¹ Also referred to as data within the Provisional ARTG Record (PAR) field.

Code	Description	Variation category	Requires update to ARTG data ¹
ISEM	Drug substance and excipients specifications — change to method of analysis of non-biological excipients in a biological medicine	SAR	
ISNT	Drug substance and excipients specifications — addition of new test and limit	SAR	
ISPE	Drug substance and excipients specifications — minor changes to physicochemical test methods and limits	SAR	
ISQC	Drug substance and excipients specifications — changes to quality control testing equipment	SAR	
ISRM	Drug substance and excipients specifications — change to method of determining residual solvents (including water)	SAR	
IMPC	Ingredients of human and animal origin — change to source	Category 3	Formulation
IMPM	Ingredients of human and animal origin — change to method of manufacture	Category 3	
PCDC	Ingredients — diluent or product component changes	Category 3	
GTCM	Gene technology — changes	Category 3	
Site of manufacture changes			
Report separately	Manufacturing — change to manufacturer's name or the manufacturing address, provided the actual site location does not change	Requires reporting to the TGA but not prior approval	
Report separately	Manufacturing — changes to the test method and/or acceptance criteria for raw materials	Requires reporting to the TGA but not prior approval	

Code	Description	Variation category	Requires update to ARTG data ¹
Report separately	Manufacturing — changes to manufacturing process documentation (editorial)	Requires reporting to the TGA but not prior approval	
OAMS	Albumin — change of manufacturer's name or contact details	Notification	
PMRS	Drug product site of manufacture — addition of new site of release-for-supply operations for a registered drug product	Notification	Manufacturers
OHMS	Heparin (crude) — change of heparin manufacturer or supplier	SAR	Manufacturers
PDDM	Drug product/substance site of manufacture — cessation of a site or deletion of a manufacturing step	SAR	Manufacturers
PDQC	Drug product/substance site of manufacture — change to quality control testing site	SAR	Manufacturers
PMER	Drug product site of manufacture — change to manufacturer or supplier of excipients or raw materials	SAR	Manufacturers
PMSP	Drug product site of manufacture — addition of new manufacturing site for secondary packaging operations	SAR	Manufacturers
APMN	Manufacturing — changes to the manufacturing site of the drug substance or drug product (no ARTG data update)	Category 3	
APMS	Manufacturing — changes to the manufacturing site of the drug substance or drug product	Category 3	Manufacturers
Drug product manufacture changes			
CAMC	Correct an ARTG entry — manufacturer	Correction	Manufacturers
PMDS	Drug product manufacture — changes to dimensions, shape, inked imprint, embossing or debossing of solid dosage forms	SAR	Visual Identification

Code	Description	Variation category	Requires update to ARTG data ¹
PMRO	Drug product manufacture — reduction or removal of API and excipient overages for ingredients that are not antioxidants or similar	SAR	
APMP	Manufacturing — changes to the manufacturing process of a drug substance and drug product	Category 3	
Drug product specifications or test changes			
PMPL	Drug product specification — minor changes to physicochemical test methods and limits	Notification	
PSNL	Drug product specification — narrowing of test limits	Notification	
PSNT	Drug product specification — addition of test and limit	Notification	
PSPT	Drug product specification — changes resulting from pharmacopoeial or TGO requirements	Notification	
PSQC	Drug product specification — change to quality control testing equipment	Notification	
PSSM	Drug product specification — change to sterility test method	SAR	
DFCI	Formulation — addition or deletion of, or variation to, an inked imprint	SAR - separate & distinct good	Formulation
DFFC	Formulation — change relating to colouring agent, flavour or fragrance	SAR - separate & distinct good	Formulation
IPCS	Drug substance and drug product — changes to specifications or test methods	Category 3	
PFCF	Formulation — changes (BM) — Retaining AUST R number	Category 3 - separate & distinct good - Retaining AUST R number	Formulation

Code	Description	Variation category	Requires update to ARTG data ¹
PFNA	Formulation — changes (BM) — New AUST R number	Category 3 - separate & distinct good - New AUST R number	Formulation
In-house reference standard changes			
IRSR	In-house reference standard — replacement	Notification	
IRNA	In-house reference standard — changes	Category 3	
Purification process changes			
PPCR	Purification process — column life reduction	Notification	
PPHR	Purification process — holding time reduction for a non-plasma-derived product	Notification	
Filling changes			
FLIS	Filling — introduction of a similar filling line	SAR	
PFCP	Filling — changes to drug product filling	Category 3	
Changes to storage of drug substance			
ASRS	API storage conditions — reduction in shelf life	Notification	
ACDM	API storage conditions — change of storage container dimensions or manufacturer	SAR	
DDSL	Shelf life — changes to shelf life or storage conditions of the drug substance	Category 3	
Changes to storage of drug product			
CASL	Correct an ARTG entry — shelf life / storage condition	Correction	Container & Shelf Life

Code	Description	Variation category	Requires update to ARTG data ¹
PSLD	Drug product storage conditions — reduction in shelf life	Notification	Container & Shelf Life
PSET	Drug product storage conditions — changes to excursion temperature during manufacture	Notification	
PSAR	Drug product storage conditions — addition of a restrictive shelf life or storage condition	Notification	Container & Shelf Life
PSLC	Shelf life — changes to shelf life or storage conditions of a drug product	Category 3	Container & Shelf Life
Fermentation process changes			
FPFM	Fermentation — change of filter manufacturer	Notification	
FPNC	Fermentation — more stringent internal process controls	Notification	
FPRP	Fermentation — reduction in fermentation period	Notification	
Plasma Master File changes			
Report separately	Plasma — master file changes	Requires reporting to the TGA but not prior approval	
PMFC	Plasma — master file changes	Category 3	
Plasma fractionation intermediates changes			
PFCR	Plasma — changes to fractionation intermediates — column life reduction	Notification	
PFSC	Plasma — changes to fractionation intermediates — more stringent internal process control	Notification	
PFIC	Plasma — changes to fractionation intermediates	Category 3	

Code	Description	Variation category	Requires update to ARTG data ¹
Product information (PI) changes: Quality aspects, corrections and self-assessable requests			
CAPI	Correct an ARTG entry – Product Information (PI)	Correction	
PIAE	PI — adding the names of excipients in the product	SAR	
PICA	PI — adding the Chemical Abstracts Service (CAS) number, molecular formula/weight and/or chemical structure/nomenclature of the API	SAR	
PIPD	PI — changing the PI of radiopharmaceuticals to give instructions that the patient dose should be measured immediately before administration	SAR	
PIPS	PI — changing the name, address or other details of the product's sponsor or distributor	SAR	
PIRI	PI — changing the PI of radiopharmaceuticals to give instructions / information on radiation protection and safety of user and patient	SAR	
PISR	PPI — putting into effect the guidelines in section 20.2 of Guidance 20: Radiopharmaceuticals	SAR	
PICC	PI — changes to quality aspects of the product information	Category 3	
Product label changes			
	Changes to labels that do not require reporting to the TGA.	Does not require reporting to the TGA	
LPCL	Label — addition or deletion of, or change to, the company logo or livery	Notification	
LPCP	Label — addition or deletion of, or change to, the pictogram of a product or its dosage form	Notification	

Code	Description	Variation category	Requires update to ARTG data ¹
LPCS	Label — addition or deletion of, or change to, the name or address of the Australian sponsor or supplier of the product	Notification	
LPDG	Label — deletion of existing graphics, pictures or diagrams, and any associated text	Notification	
LPDR	Label — deletion of repeated text (present elsewhere on a label) from selected side panels provided that the information is not mandatory	Notification	
LPIA	Label — addition/deletion of, or change to, simple instructional, informational or anti-tampering statements as outlined in the TGA Guidance	Notification	
LPOP	Label — addition/deletion of, or change to text of outer protective pouches or overwraps as outlined in the TGA guidance	Notification	
LOAI	Label — addition of a new TGA-approved route of administration for injectable medicines	SAR	
LOCA	Label — changes as a result of approved corrections made to an entry in the ARTG.	SAR	
LOCN	Label — change to names of actives, excipients or dosage forms resulting from changes in the AAN, ingredients database or code tables in TGA eBS.	SAR	
LOEI	Label — changes to the method of expressing the content of active ingredients or excipients, in accordance with the current labelling TGO.	SAR	
LOPR	Label — changes as a result of product rescheduling (following from changes to the Poisons Standard).	SAR	
LOPS	Label — amendments due to implementation of changes that do not require prior approval from the TGA.	SAR	

Code	Description	Variation category	Requires update to ARTG data ¹
LOSA	Label — amendments resulting from the implementation of a SAR that is either submitted simultaneously or has been previously approved by the TGA.	SAR	
LOTG	Label — changes to comply with current TGOs for labels that have previously been evaluated and approved by the TGA.	SAR	
LPCO	Label — addition/deletion of, or change to, the statement of country of origin or manufacture for imported products.	SAR	
LPDL	Label — changes to the colour, design or layout of labels with no change to content and retaining differentiation of strengths.	SAR	
LPSP	Label — change to the layout or design of a physician sample pack.	SAR	
LPWS	Label — addition or deletion of, or change to, the website address of an Australian owned and managed company.	SAR	
LQAB	Label — addition of excipients	SAR	
LQBM	Label — amendment of expression of API content in topical preparations as previously approved.	SAR	
LQHB	Label — addition of 'hypotonic', 'hypertonic' and 'isotonic' for large-volume injections.	SAR	
LQRB	Label — addition of a previously approved release rate for transdermal patches.	SAR	
LWAB	Label — addition of a warning or cautionary statement where an incorrect route for method of administration is hazardous	SAR	
LWSB	Label — changes to/addition of a warning or precaution statement resulting from an approved safety-related variation to the PI.	SAR	

Code	Description	Variation category	Requires update to ARTG data ¹
LCDE	Label changes — any changes requiring data for evaluation	Category 3	
DTTR	Trade name replacement – Retaining AUST R number	Category 3 - separate & distinct good – Retaining AUST R number	Good Name
Pack size changes			
CAPS	Correct an ARTG entry – pack size & poison schedule	Correction	Pack Size & Poison Schedule
PPRU	Pack size — reduction of number of units in pack size excluding volume of fill of injections or other sterile preparations	SAR	Pack Size & Poison Schedule
PSCA	Packaging — change to or addition of pack size	Category 3	Pack Size & Poison Schedule
Drug product packaging changes			
CACI	Correct an ARTG entry — container information	Correction	Container & Shelf Life
PPAT	Packaging — introduction of anti-tamper packaging (materials not in contact with drug product)	Notification	
CCPC	Packaging — changes	Category 3	Container & Shelf Life
PCCT	Packaging — changes to container type – New AUST R number	Category 3 - separate & distinct good – New AUST R number	Container & Shelf Life
Changes specific to influenza vaccines			
IVMP	Influenza vaccine — strain-specific variations to manufacturing processes.	SAR	
IVPL	Influenza vaccine — passage or lot number change of approved reassorted virus or approved virus isolate.	SAR	

Code	Description	Variation category	Requires update to ARTG data ¹
IVRR	Influenza vaccine — reference reagent replacement	SAR	
IVSL	Influenza vaccine — working seed lot change	SAR	
IVSC	Influenza vaccine changes	Category 3	
Other changes			
CADF	Correct an ARTG entry — dosage form	Correction	Dosage Form
CAGN	Correct an ARTG entry — good name	Correction	Good Name
CAIC	Correct an ARTG entry — indications	Correction	Indications
CANC	Correct an ARTG entry — ATC Nordic codes	Correction	ATC Nordic Codes
CAQI	Correct an ARTG entry — quality-related information, includes labels	Correction	
CARA	Correct an ARTG entry — route of administration	Correction	Route of Administration
CASI	Correct an ARTG entry — sterility information	Correction	Sterility
CAVI	Correct an ARTG entry — visual identification/product description.	Correction	Visual Identification
OMPS	Medicines and poisons — scheduling changes	SAR	Pack Size & Poison Schedule
SARO	Other self-assessable changes — an application using this type must include written advice from the TGA	SAR	
OQRC	Quality-related changes (other) that do not create a separate and distinct good.	Category 3	

Code	Description	Variation category	Requires update to ARTG data ¹
Associated changes (to be used when one variation requires multiple PAR fields to be updated)			
Changes associated with formulation changes DFCI and DFFC			
ZFSM	ARTG data - Manufacturer changes associated with DFCI or DFFC	SAR	Manufacturers
ZFSV	ARTG data - Visual identification changes associated with DFCI or DFFC	SAR	Visual Identification
Changes associated with formulation change PFCF or name change DTTR			
ZFRC	ARTG data - Container and shelf life changes associated with DFCF/PFCF or DTTR - Retaining AUST R number	Category 3 - separate & distinct good – Retaining AUST R number	Container & Shelf Life
ZFRM	ARTG data - Manufacturer changes associated with DFCF/PFCF or DTTR - Retaining AUST R number	Category 3 - separate & distinct good – Retaining AUST R number	Manufacturers
ZFRN	ARTG data - Good name changes associated with DFCF/PFCF - Retaining AUST R number	Category 3 - separate & distinct good – Retaining AUST R number	Good Name
ZFRO	Other consequential changes to the dossier associated with DFCF/PFCF or DTTR – Retaining AUST R number	Category 3 - separate & distinct good – Retaining AUST R number	
ZFRP	ARTG data - Pack size and poison schedule changes associated with DFCF/PFCF or DTTR - Retaining AUST R number	Category 3 - separate & distinct good – Retaining AUST R number	Pack Size & Poison Schedule
ZFRS	ARTG data - Sterility changes associated with DFCF/PFCF or DTTR - Retaining AUST R number	Category 3 - separate & distinct good – Retaining AUST R number	Sterility Information

Code	Description	Variation category	Requires update to ARTG data¹
ZFRV	ARTG data - Visual identification changes associated with DFCF/PFCF or DTTR - Retaining AUST R number	Category 3 - separate & distinct good – Retaining AUST R number	Visual Identification
Changes associated with formulation change PFNA or packaging change PCCT			
ZFNC	ARTG data - Container and shelf life changes associated with DFNA/PFNA - For the new AUST R number	Category 3 - separate & distinct good – New AUST R number	Container & Shelf Life
ZFNM	ARTG data - Manufacturer changes associated with DFNA/PFNA or PCCT - For the new AUST R number	Category 3 - separate & distinct good – New AUST R number	Manufacturers
ZFNN	ARTG data - Good name changes associated with DFNA/PFNA or PCCT - For the new AUST R number	Category 3 - separate & distinct good – New AUST R number	Good Name
ZFNO	Other consequential changes to the dossier associated with DFNA/PFNA or PCCT - For the new AUST R number	Category 3 - separate & distinct good – New AUST R number	
ZFNP	ARTG data - Pack size and poison schedule changes associated with DFNA/PFNA or PCCT - For the new AUST R number	Category 3 - separate & distinct good – New AUST R number	Pack Size & Poison Schedule
ZFNS	ARTG data - Sterility changes associated with DFNA/PFNA or PCCT - For the new AUST R number	Category 3 - separate & distinct good – New AUST R number	Sterility Information

Code	Description	Variation category	Requires update to ARTG data ¹
ZFNV	ARTG data - Visual identification changes associated with DFNA/PFNA or PCCT - For the new AUST R number	Category 3 - separate & distinct good – New AUST R number	Visual Identification
Part 2: Product information (PI) changes			
Product information (PI) changes: Minor editorial changes and safety related requests (SRRs)			
PIME	PI — make minor editorial changes	MEC	
PIID	PI — remove an indication with data	SRR	Indications
PIIN	PI — remove an indication — no data	SRR	Indications
PIOD	PI — make safety related changes with data	SRR	
PION	PI — make safety related changes no data	SRR	

1. Corrections, notifications and quality information changes

The Variation e-form for prescription medicines has four category groups which are described in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#):

- Correct an ARTG entry
- Notification
- Quality information
- Product information (PI).

Part 1 of this guidance describes the changes that can be made within the corrections, notifications and quality information category groups. This includes changes to the quality aspects of the PI, corrections to the PI and self-assessable requests (SARs) related to PI information.

For changes that can be made within the product information (PI) category including minor editorial changes and safety related requests see [Part 2: Product information \(PI\) changes](#).

1.1 Cell bank or seed lot changes

1.1.1 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

CSNW: Cell bank or seed lot — addition of a new working cell bank or working seed lot

Addition of a new working cell bank or working seed lot.

Conditions

- The new working cell bank or working seed lot is to be derived from the previously approved master cell bank or master seed lot.
- The TGA must have explicitly approved the protocol for this purpose. The protocol should have been submitted with the application for registration or a subsequent Category 3 application to change the working cell bank or working seed lot.
- Genetic stability, product yield, adventitious agent safety, and quality and purity must not be affected by the change, as shown by the validation study.

Data requirements

You must submit:

- Details of the new working cell bank or working seed lot.
- The proposed date of implementation.

- A declaration that the new working cell bank or working seed lot has been validated by an approved protocol (stating the date of approval of the protocol) and found to be acceptable.

CSSS: Cell bank or seed lot — change of storage site of master or working cell bank or seed lot

Change to the storage site for the master cell bank or seed lot, or working cell bank or seed lot.

Conditions

- The change must be to the backup/reserve storage site only.

Data requirements

You must submit:

- The address of the new site.
- Details of the facility that has taken responsibility for GMP compliance for the secondary storage site.

1.1.2 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

CBSL: Cell banks or seed lots — changes

Any proposed quality related change to cell banks or seed lots can be submitted as part of this Category 3 variation type (for biological medicines that are not [influenza vaccines](#)).

Examples of changes to cell banks and seed lots that require the evaluation of data include:

- The creation of a new master cell bank or seed lot. These may be permitted as a Category 3 application (versus a Category 1 application) only if there is justification for not providing clinical data.
- The creation of a new working cell bank or seed lot (in some circumstances such changes can be [self-assessable](#)).
- A change in storage conditions.
- A change in the primary storage site of the cell bank or seed lot – the new site will require GMP clearance.
 - A primary storage site for the master or working cell bank or master or working seed lot is the principal storage site or location from which the master and working cell bank/seed lot is retrieved for use in manufacturing. The site(s) which are used for back-up storage of the master or working cell bank/seed lot are considered secondary storage sites(s).

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the proposed change.

- Justification for the change, including changes to test procedures.
- Appropriate validation data.

1.1.3 Other cell bank or seed lot changes

Information about changes to the working seed lot for influenza vaccines is at:

- [IVSL: Influenza vaccine – working seed lot change](#)

1.2 Drug substance or excipient changes



Certified product details (CPD) documents

For many biological medicines, critical tests are conducted on the drug substance and not repeated on the drug product because of low concentrations of the drug substance or interference by excipients.

If any of the notification requests below result in changes to the drug substance or drug product specifications or the non-pharmacopoeial test methods, please provide a new copy of the entire document, including testing methodology, even if these details have not changed. The CPD document can be provided using the [CPD form](#) available on the TGA website.

1.2.1 Changes that do not require reporting to the TGA

These changes can be implemented without reporting to the TGA. This does not include any proposed changes that require a consequential change to the approved product information of the registered medicine.

Where these changes affect information within your dossier previously submitted to the TGA, the relevant update can be submitted as part of a subsequent variation. See information about changes that do not require reporting to the TGA in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

Drug substance and excipients — change to local handling agent contact details (including material of biological origin)

You do not need to notify the TGA if you are making a variation that involves changes to the local distributor of the drug substance and excipient including material of biological origin.

Conditions

- Same site and method of manufacture, specifications and, where applicable, biological source, including geographical origin and supplier.

1.2.2 Correction to, or completion of, an ARTG entry

Sponsors can request corrections to ARTG entries under s. 9D(1) of the [Therapeutic Goods Act 1989](#). Alternatively, the Secretary can make corrections to ARTG entries under s. 9D(1), at his or her initiative. Refer to the [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#) for further information.

CAAO: Correct an ARTG entry — Animal origin

Requires update to ARTG data: Formulation.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

CAFC: Correct an ARTG entry — Formulation

Requires update to ARTG data: Formulation.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

1.2.3 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

ISAM: Drug substance and excipients specifications — change of test method

Change to test method of the drug substance, where it is replaced with a pharmacopoeial method.

Conditions

- The method being changed must not be a viral safety testing method.
- The in-house test method being changed is replaced with a pharmacopoeial method. If there are differences in specifications between the two methods, the more stringent specifications should apply.
- The stringency of the specifications should not decrease as a result of the change.

- Batch analytical data for at least three commercial batches should have been generated to demonstrate compliance with the new test and limit.

Data requirements

You must submit:

- Details of the new method.
- An updated [CPD document, if applicable](#).

ISNL: Drug substance or excipients specifications — narrowing of limits

More stringent limits for test results of the drug substance, starting materials, intermediates or excipients in the drug product.

Conditions

- The proposed limits must be consistent with the relevant TGA standards and guidelines.
- Do not change the composition of the substance tested. For example, you cannot narrow the test limits for isoelectric point, as this could alter the substance by resulting in the omission of a charge isoform of protein.
- The change must not be a consequence of any commitment from previous assessments to review specification limits (e.g. made during the procedure for the marketing authorisation application or a variation application).
- The change must be within the range of currently approved limits.
- The test procedure remains the same, or changes in the test procedure are minor.

Data requirements

You must submit:

- The revised set of specifications for the substance.
- An updated [CPD document](#), if applicable.

ISPT: Drug substance or excipients specifications — amendments resulting from pharmacopoeial or TGO changes

Changes resulting from amendments to pharmacopoeial requirements or the requirements of Therapeutic Goods Orders.



If a substance complies with the requirements of an earlier edition of an official pharmacopoeia, such as the British pharmacopoeia [BP], it would be appropriate to substitute the requirements of the current edition of that pharmacopoeia. However, any tests that were performed in addition to those of the pharmacopoeial monograph should continue to be applied.

Changing from the requirements of one pharmacopoeia to those of another (such as from the USP to the BP) is not covered by this section and may require [evaluation of data by the TGA](#).

Conditions

- The change should not involve changing from the requirements of one pharmacopoeia to those of another.
- Any tests that were performed in addition to those of the pharmacopoeial monograph or TGO must continue to be performed.
- The new pharmacopoeial monograph or amended TGO must be applicable to the substance.

Data requirements

You must submit:

- The revised set of specifications for the drug substance.
- An updated [CPD document](#), if applicable.

1.2.4 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

IMRS: Drug substance and excipients manufacture (from Category IC ruminant tissues) — changes in source (from animal to non-animal) and/or manufacturing process or site

Change to source, manufacturing process or site of manufacture of excipients derived from Category IC ruminant tissues.

Requires update to ARTG data: Formulation.



Category IC ruminant tissues are defined in the TGA's [Transmissible Spongiform Encephalopathies \(TSE\): TGA approach to minimising the risk of exposure](#).

Conditions

- The product must only be intended for oral, topical, vaginal, rectal or inhalation routes, with no potential for cross-contamination with higher risk (Category A or B) tissues.
- The change should be from a ruminant-derived source to a plant or other non-animal source.
- The product should not be administered by the parenteral, ophthalmic or intra-tracheal routes.
- Either no changes to the specification of the excipients have been made, or the excipients have been changed as allowed in the [Drug substance or excipient changes](#) section.

Data requirements

You must submit:

- Where relevant, Certificate of Suitability (CEP) issued by the European Directorate for the Quality of Medicines and Healthcare (EDQM) to the manufacturer of the excipient

(acceptability of the CEP depends on the source country of the animal and the parts of the animal used to manufacture the excipient).

- A declaration that the [Category IC](#) material has been self-assessed and complies with the TGA's requirements regarding TSE risks.
- An assurance that records of compliance will be maintained for future inspection by the TGA.
- The revised specifications, if changes have been made.

ISEM: Drug substance and excipients specifications — change to method of analysis of non-biological excipients in a biological medicine

Change to the method of analysis of non-biological excipients for biological medicine products.

Conditions

- The change should only be to a non-pharmacopoeial method of analysis.



If tested according to a pharmacopoeial method, a change to the method of analysis of a non-biological excipient does not require prior approval.

- The change should demonstrably improve precision, accuracy or specificity, without reducing any of these parameters. The one exception is that improved specificity or accuracy may be associated with reduced precision, but only if precision remains within the specified limits.

Data requirements

You must submit:

- Details of the new test method.

You must generate the following:

- Appropriate validation data for the proposed method.

ISNT: Drug substance and excipients specifications — addition of new test and limit

Addition of a new test and limit to the existing specifications of the drug substance, starting materials, intermediates or excipients in the drug product.

Conditions

- The test should be relevant.
- The limits proposed should be based on batch analytical data and must comply with any applicable official standard or relevant guidelines.

Data requirements

You must submit:

- Details of the test method.
- The revised set of specifications for the substance.

- The updated [CPD document](#).

You must generate the following:

- Appropriate validation data for the test method.

ISPE: Drug substance and excipients specifications — minor changes to physicochemical test methods and limits

Minor changes to physicochemical tests for excipients.

Conditions

- The change should be a minor change to methods for parameters such as pH, osmolality, hydration state, water content or spectrometry. Any other changes require [evaluation of supporting data by the TGA](#).
- The proposed changes should meet pharmacopoeial requirements.
- The proposed changes should not include changes to specifications of excipients.

Data requirements

You must submit:

- A summary description of the change.
- Details of the new method.

ISQC: Drug substance and excipients specifications — changes to quality control testing equipment

Change to equipment used for quality control testing of the drug substance, starting materials, intermediates or excipients in the drug product.

Conditions

- The change should meet previously approved validity criteria for the test method. Changes that do not meet previously approved validity criteria are not self-assessable, and the TGA will need to [evaluate supporting data](#).

Data requirements

You must submit:

- Description of the new equipment.
- An updated [CPD document](#), if applicable.

You must generate the following:

- Appropriate validation data for the changed test equipment using the previously approved criteria and, where applicable, the same validation protocol as was used for the previously approved equipment.
- Appropriate validation data for the relevant consumables if the type or brand of consumables used with the equipment is critical (that is, included in the protocol).

ISRM: Drug substance and excipients specifications — change to method of determining residual solvents (including water)

Change to the method for determining the content of residual solvents, including water of the drug substance or excipients in the drug product.

Conditions

- The new method should demonstrably improve precision, accuracy or specificity, without reducing any of these parameters. The one exception is that improved specificity or accuracy may be associated with reduced precision, but only if precision remains within the specified limits.

Data requirements

You must submit:

- Details of the new method.
- An updated [CPD document](#).

You must generate the following:

- Appropriate validation data for the proposed method.

1.2.5 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

IMPC: Ingredients of human and animal origin — change to source

Any proposed changes to the source of ingredients of human and animal origin can be submitted as part of this Category 3 variation type.

This includes changes to the source of raw materials of human or animal origin, for example, albumin or heparin.

Requires update to ARTG data: Formulation.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- For excipients derived from Category IC tissues from TSE-relevant ruminant species that are used in products that are implants or injectable products given by the parenteral, ophthalmic or intra-tracheal routes, or for excipients derived from Category IA or IB tissues from TSE-relevant ruminant species (see [Transmissible Spongiform Encephalopathies \(TSE\): TGA approach to minimising the risk of exposure](#)) used in products given by the oral, topical, vaginal, rectal or inhalation routes:
 - details of the excipients and the proposed changes
 - measures taken by the manufacturer to minimise TSE risks.
- Refer to TGA's [Guidance 9](#) and [Guidance 10](#) for additional details on requirements for ingredients of human or animal origin. See also [PMFC](#) and [PFIC](#) for information about

changes to plasma-derived products. Refer to the [information box](#) for special requirements for heparin products.

IMPM: ingredients of human and animal origin — change to method of manufacture

Any proposed changes to the manufacturing process of ingredients of human and animal origin can be submitted as part of this Category 3 variation type. This includes changes to the manufacturing process of raw materials of human or animal origin, for example, albumin or heparin.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- For excipients derived from Category IC tissues from TSE-relevant ruminant species that are used in products that are implants or injectable products given by the parenteral, ophthalmic or intra-tracheal routes, or for excipients derived from Category IA or IB tissues from TSE-relevant ruminant species (see [Transmissible Spongiform Encephalopathies \(TSE\): TGA approach to minimising the risk of exposure](#)) used in products given by the oral, topical, vaginal, rectal or inhalation routes:
 - details of the excipients and the proposed changes
 - measures taken by the manufacturer to minimise TSE risks.
- Refer to TGA's [Guidance 9](#) and [Guidance 10](#) for additional details on requirements for ingredients of human or animal origin. See also [PMFC](#) and [PFIC](#) for information about changes to plasma-derived products. Refer to the [information box](#) for special requirements for heparin products.

PCDC: Ingredients — diluent or product component changes

Any proposed changes to product components require the TGA to evaluate the data can be submitted as part of this Category 3 variation type. This includes any changes to diluents and any change to, or addition of, a component of a biological medicine.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Description of the proposed change.
- Justification for the proposed change, including changes to test procedures.
- Appropriate validation data.

GTCM: Gene technology — changes

Please contact the TGA for advice before using this variation type. If you select this variation you will need to provide a copy of the written advice from the TGA advising that this variation type can be used.

Proposed changes to gene technology aspects can be submitted as part of this Category 3 variation type. Any changes to production cell lines are considered to be major manufacturing changes and will require thorough genetic characterisation, validation, comparability and stability studies.

If the product quality varies as a result of the change, clinical data will likely be required to support the variation application. This requires lodgement of a Category 1 application under the [Prescription medicines registration process](#).

Conditions

- Sponsors must revalidate the manufacturing process if there is any change in batch size or batch definition (for example, pooling of multiple batches from fermentation), or a change to the in-process controls.
- Analytical validation will need to be redone if there are any changes to analytical methods or specifications.

Data requirements

You must submit:

- If you choose not to provide validation, you must include a statement of assurance that there have been no changes to the process, in-process controls, analyses and specifications.
- A copy of the written advice from the TGA advising that this variation type can be used.

1.2.6 Other drug substance changes

For other changes to the manufacturing process of a drug substance see:

- [APMP: Manufacturing – changes to the manufacturing process of a drug substance and drug product](#)

1.3 Site of manufacture changes

Definitions

Change in site of manufacture means a change in the location of the manufacturing premises.

Packaging material means any material employed in the packaging of a medicinal product, excluding any outer packaging used for transportation or shipment:



- Packaging materials are referred to as primary or secondary according to whether or not they are intended to be in direct contact with the product.
- Secondary packaging includes any packaging or labelling (including repackaging or labelling, over-labelling or supplementary labelling) where the medicine remains in the primary container and that primary container is not opened, breached or modified in the secondary packaging process.
- Primary and secondary packaging require different levels of good manufacturing process certification.

Release for supply means that ‘medicinal products are not sold or supplied before an authorised person has certified that each production batch has been produced and controlled in accordance with the requirements of the market authorisation and other regulations relevant to the production control and release of medicinal products’ (refer to the [Guide to Good Manufacturing Practice for Medicinal Products](#)).

- There may be more than one site involved in release for supply of a product. However, release for supply should only happen once, to ensure that the complete batch records (and responsibility for release) are held in one place. All sites must demonstrate compliance with good manufacturing practice (GMP) through a Therapeutic Goods Administration licence or clearance. Compliance with shipping conditions during importation into Australia is the responsibility of the Australian sponsor for products released for supply overseas. The sponsor does not require a GMP licence to perform this step.

1.3.1 Changes that do not require prior approval

These changes can be implemented before you inform the TGA of the change. Reporting to the TGA should be made in writing, together with any relevant documentary evidence required in support and the date of implementation advised. No specific form is required. This process cannot be used if the proposed changes require a consequential change to the approved product information of the registered medicine.

See information on changes that do not require prior approval in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

Manufacturing — change to manufacturer’s name or the manufacturing address, provided the actual site location does not change

Change to manufacturer’s name only (including manufacturers who are also product sponsors) or the manufacturing address, provided the actual site location does not change.

Conditions

- The change includes manufacturers who are also product sponsors.
- The physical location of the manufacturing facility remains the same.

Data requirements

You must submit:

- Notification of the change
- Valid evidence of good manufacturing practice (GMP) for the company with the new name.

Manufacturing — changes to the acceptance criteria for raw materials

Changes to the method of manufacture of a drug substance or drug product.

Conditions

- The changes must meet the specifications of the relevant official standard.

- There is no reduction in the quality of the product.

Data requirements

You must submit:

- Written notification of the change, including date of implementation.
- A summary of the new acceptance criteria, preferably in tabular format.
- Any relevant documentary evidence.

Manufacturing — changes to manufacturing process documentation (editorial)

Typographic and editorial changes to documentation for the manufacturing process.

Conditions

- The performance of the procedure has not changed.

Data requirements

You must submit

- Written notification of the change, including date of implementation.
- A clean and a marked-up copy of the manufacturing process documentation.
- Any relevant documentary evidence.

1.3.2 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

OAMS: Albumin — change of manufacturer's name or contact details

Change in details of albumin manufacturer or supplier.

Conditions

- The change may apply to the name or contact details of albumin suppliers or manufacturers, but not to the site or process of manufacture.
 - Changes to site or process of manufacture of albumin products require TGA [evaluation of supporting data](#).

Data requirements

You must submit:

- Details of the new manufacturer or supplier.
- Evidence of GMP clearance, showing the changed name.
- An assurance that the albumin still complies with relevant TGO and other standards such as the European or British Pharmacopoeia (Ph Eur or BP).

PMRS: Drug product site of manufacture — addition of new site of release-for-supply operations for a registered drug product

Addition of a new manufacturer for release for supply of the final drug product.

Requires update to ARTG data: Manufacturers.

Conditions

- The new site must either have:
 - for Australian manufacturers, a current manufacturing licence issued by the TGA for this type of manufacture or
 - for overseas manufacturers, current GMP clearance issued by the TGA and valid at the time of this application for this type of manufacture.

Data requirements

You must submit:

- Details of the new manufacturing site
- The Australian licence and/or GMP clearance number.

1.3.3 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

OHMS: Heparin (crude) – change of heparin manufacturer or supplier

Change in manufacturer or supplier of crude heparin.

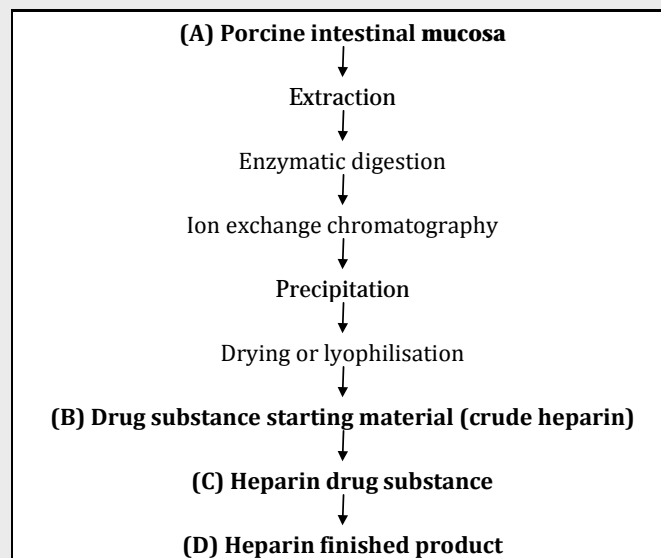
Requires update to ARTG data: Manufacturers.



Heparin products

The stage of manufacture at which starting material for a heparin product is considered to be the drug substance (also known as the active pharmaceutical ingredient, or API) is earlier than for other biological medicines. This is described in current monographs and good manufacturing practice (GMP) requirements for heparin products. It means that GMP clearance is required earlier in the process for heparin products than for products that do not contain heparin.

The point at which the drug substance starting material is introduced into the process, as interpreted by the Therapeutic Goods Administration (TGA) for manufacture of a heparin drug substance, is defined in the flowchart below. It is important to note that steps A to B in the flowchart are the only steps in manufacture that do not have to be covered by TGA-issued GMP clearance.



Flowchart of the manufacturing process for heparin drug product from porcine intestinal mucosa

Manufacturing steps A to B result in the drug substance starting material (crude heparin). Any step of manufacture beyond this point is regarded as drug substance manufacture and must be covered by TGA-issued GMP clearance.

Conditions

- There should be no change to the country of origin of the crude heparin.

Data requirements

You must submit:

- Details of the change, including the following:
 - names and addresses of the supplier(s) of the crude heparin
 - names and addresses of the suppliers of the raw starting material (the porcine intestinal mucosa)
 - names and addresses of the suppliers any of the intermediates up to the crude heparin.

PDDM: Drug product/substance site of manufacture — cessation of a site or deletion of a manufacturing step

Deletion of site of manufacture.

Requires update to ARTG data: Manufacturers.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- The name and site address of the manufacturer and the steps of manufacture to be deleted.

- GMP clearance to show that there is at least one validly registered site of manufacture performing the same step(s) of manufacture as the deleted site. This evidence should be in the form of the current printout from the TGA eBusiness Services website for the product or a copy of the TGA approval.

PDQC: Drug product/substance site of manufacture — change to quality control testing site

Change to site of quality control testing.

Requires update to ARTG data: Manufacturers.

Conditions

- There should be no modifications to the testing procedure, and the previously approved validation criteria should be met.
- The new site must either have:
 - a current manufacturing licence issued by the TGA (Australian manufacturers) for this type of manufacture or
 - a current GMP clearance issued by the TGA and valid at the time of this application (overseas manufacturers) for this type of manufacture.
- There should be no changes to the test methods used for testing the product, whether or not the test methods have been provided to the TGA previously, except where allowed by other sections within this document.
- There should be no impact on existing method validations, and the test methods have been adequately qualified to generate results comparable to that of currently approved quality control sites. The qualification data should be provided to TGA on request.
- The change should not be a change to a viral safety testing site.

Data requirements

You must submit:

- The name and address of the new site.
- Details of the manufacturing step(s) undertaken at the new site of manufacture.
- A copy of the Australian licence and/or GMP clearance.

PMER: Drug product site of manufacture — change to manufacturer or supplier of excipients or raw materials

Change to manufacturer or supplier of excipients or raw materials.

Requires update to ARTG data: Manufacturers.

Conditions

- The change should not be to excipients or raw materials of animal or human origin.
- The change should not be to excipients or raw materials used in heparin products.
- The change should not be to excipients produced by recombinant DNA technology.

Data requirements

You must submit:

- The name and street address of the new manufacturer.
- An assurance that the excipients or raw materials comply with previously approved acceptance criteria and/or storage conditions.

PMSP: Drug product site of manufacture — addition of new manufacturing site for secondary packaging operations

Addition of a new site of secondary packaging operations for an already registered product.

Requires update to ARTG data: Manufacturers.

Conditions

- The new site must either have:
 - a current manufacturing licence issued by the TGA (Australian manufacturers) for this type of manufacture or
 - a current GMP clearance issued by the TGA and valid at the time of this application (overseas manufacturers) for this type of manufacture.
- Apart from the change in site of manufacture, there should be no changes to any other aspect of the quality data other than changes to manufacturing equipment. Where a change in manufacturing equipment is made, this should have been validated in accordance with the principles of GMP.

Data requirements

You must submit:

- Details of the manufacturing step(s) undertaken at the new site of manufacture.
- A copy of the Australian licence and/or GMP clearance.

1.3.4 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

APMN: Manufacturing — changes to the manufacturing site of the drug substance or drug product (no ARTG data update)

Any proposed changes to the site of manufacture of the drug substance and drug product that do not require an update to ARTG data can be submitted as part of this Category 3 variation type. For example, relocation of manufacturing step(s) to another room in a facility with GMP clearance or licence.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- GMP evidence (that is, the Australian licence for an Australian site, or a current GMP clearance for an overseas site or reference to the clearance submission number) showing that the new site is already covered by an existing GMP clearance/ licence/ certificate. The Australian licence or GMP clearance should cover the relevant manufacturing steps and must be valid at the time of the request.
- A declaration that the manufacturing process, including batch size, is the same as that used at the currently approved manufacturing site, or a description of any differences between the processes at the new and currently approved sites.
- For plasma products, comparative impurity profiles from representative batches from the current and new sites of manufacture using validated test methods.
- Appropriate validation of the process at the new site (including validation of sterile manufacture and sterilisation processes, if applicable) to demonstrate that the product manufactured at the new site meets the currently registered requirements for in-process controls and the drug product specifications.
- Description and validation of quality control test methods where there is a change in test procedures or where the laboratory testing the product (site of quality control testing) has changed.
- Certificates of analysis for three sequential, preferably full-scale batches of drug product that were manufactured at both the currently approved site and the new site.
- Relevant comparative data on the product (see [APMP: Manufacturing – changes to the manufacturing process of a drug substance and drug product](#)).
- Relevant stability data for batches produced at the new site (refer to guidance on [Stability testing for prescription medicines](#)).
 - For biological medicine products requiring refrigeration or freezing, stability testing must be in real time at the specified storage temperature, for at least the requested shelf life. The time out of refrigeration (which also includes time out of the freezer) during normal manufacturing processes, up to the point of return to the fridge or freezer following labelling and packaging, should have been defined and justified. From that point onward, all storage and shipping conditions should be justified by the real-time stability data; the data for justifying any temperature excursions should include real-time studies of the proposed excursion followed by return to the normal storage conditions for the remainder of the shelf life.
- If the change is likely to affect critical quality parameters, data from comparability studies on pre-variation and post-variation product.
- Appropriate validation data (including revised viral load reduction claims), where a change is to a process involved in viral reduction.

APMS: Manufacturing — changes to the manufacturing site of the drug substance or drug product

Any proposed changes to the site of manufacture of the drug substance and drug product that require an update to ARTG data can be submitted as part of this Category 3 variation type.

Requires update to ARTG data: Manufacturers.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- GMP evidence for the new site (that is, the Australian licence for an Australian site, or a current GMP clearance for an overseas site or reference to the clearance submission number). The Australian licence or GMP clearance should cover the relevant manufacturing steps and must be valid at the time of the request.
- A declaration that the manufacturing process, including batch size, is the same as that used at the currently approved manufacturing site, or a description of any differences between the processes at the new and currently approved sites.
- For plasma products, comparative impurity profiles from representative batches from the current and new sites of manufacture using validated test methods.
- Appropriate validation of the process at the new site (including validation of sterile manufacture and sterilisation processes, if applicable) to demonstrate that the product manufactured at the new site meets the currently registered requirements for in-process controls and the drug product specifications.
- Description and validation of quality control test methods where there is a change in test procedures or where the laboratory testing the product (site of quality control testing) has changed.
- Certificates of analysis for three sequential, preferably full-scale batches of drug product that were manufactured at both the currently approved site and the new site.
- Relevant comparative data on the product (see [APMP: Manufacturing – changes to the manufacturing process of a drug substance and drug product](#)).
- Relevant stability data for batches produced at the new site (refer to guidance on [Stability testing for prescription medicines](#)).
 - For biological medicine products requiring refrigeration or freezing, stability testing must be in real time at the specified storage temperature, for at least the requested shelf life. The time out of refrigeration (which also includes time out of the freezer) during normal manufacturing processes, up to the point of return to the fridge or freezer following labelling and packaging, should have been defined and justified. From that point onward, all storage and shipping conditions should be justified by the real-time stability data; the data for justifying any temperature excursions should include real-time studies of the proposed excursion followed by return to the normal storage conditions for the remainder of the shelf life.
- If the change is likely to affect critical quality parameters, data from comparability studies on pre-variation and post-variation product.
- Appropriate validation data (including revised viral load reduction claims), where a change is to a process involved in viral reduction.

1.4 Drug product manufacture changes

1.4.1 Correction to, or completion of, an ARTG entry

Sponsors can request corrections to ARTG entries under s. 9D(1) of the [Therapeutic Goods Act 1989](#). Alternatively, the Secretary can make corrections to ARTG entries under s. 9D(1), at his or her initiative. Refer to the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#) for further information.

CAMC: Correct an ARTG entry — manufacturer

Requires update to ARTG data: Manufacturers.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.
- Valid GMP clearances and/or Australian manufacturing licences for the relevant steps of manufacture.

1.4.2 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

PMDS: Drug product manufacture — changes to dimensions, shape, inked imprint, embossing or debossing of solid dosage forms

Changes to dimensions, shape, inked imprint, or embossing and debossing of solid dosage forms.

Requires update to ARTG data: Visual Identification.



Definitions

An **inked imprint** is a marking or pattern on the product made by printing with an ink during product manufacture.

Embossing/debossing is either the raised (embossed) or depressed (debossed) marking, pattern or engraving on the product that is formed by special tools used during product manufacture.

Conditions

- The product should be a solid dosage form (note that capsules are considered to be solid dosage forms, but impregnated sponges are not).
- There should be no concurrent change to the formulation except as allowed in [self-assessable requests that create a separate and distinct good](#).
- There should be no change to, or addition or deletion of, scoring.
- Where an inked imprint is changed, there should be no change to the imprinting ink used.

Data requirements

You must submit:

- The new product description.
- The revised set of drug product specifications at release and expiry.
- An updated CPD document.
- Where the proposed change requires an update to the PI, details of changes to the PI, as outlined in the [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

PMRO: Drug product manufacture — reduction or removal of API and excipient overages for ingredients that are not antioxidants or similar

Reduction or removal of overage.

Conditions

- Stability testing of the product with reduced overage on at least three production batches of the post-variation product should show that all products meet specifications at the expiration date. This should be done according to [International Conference on Harmonisation \(ICH\) requirements](#), and data should be made available to the TGA on request.



Any failure to meet drug product specifications during the stability trials should be notified to the TGA as a priority.

The TGA reserves the right to withdraw the product from the market if this requirement is not met.

- Any excipient involved should not be an antioxidant or another ingredient whose function (at least in part) involves being 'consumed' over time.

Data requirements

You must submit:

- The revised manufacturing formula.
- An updated [CPD document](#).

You must generate the following data:

- Appropriate validation data for manufacture of the product with reduced overage.

1.4.3 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

APMP: Manufacturing — changes to the manufacturing process of a drug substance and drug product

Any proposed changes to the method of manufacture of the drug substance and drug product can be submitted as part of this Category 3 variation type.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- A detailed description of the changed manufacturing process, including a flow diagram.
- Process validation data for the changed process (including validation of sterile manufacture and sterilisation processes, if applicable).
- If the drug substance is made entirely by fermentation, details of any material of animal origin used during the process that is classified as Category IC in the TGA's [Transmissible Spongiform Encephalopathies \(TSE\): TGA approach to minimising the risk of exposure](#). If appropriate, provide the necessary assurance regarding self-assessment of TSE risks of such materials.
- Where a manufacturer produces multiple products at the same site, details of the manufacturing process(es) and the measures taken to ensure that there is no cross-contamination of different drug substances.
- Batch analytical data generated for three full production-scale batches of drug substance or drug product manufactured using the proposed process, unless otherwise justified. These data should be compared with data from at least three batches of recently manufactured pre-variation product and the mean, standard deviation and range of historical data. All data should be generated using approved routine quality control methods, unless otherwise justified and details are provided of the non-routine methods used.
- Real-time stability data generated for batches produced using the new process (refer to guidance on [Stability testing for prescription medicines](#)).
 - For biological medicine products requiring refrigeration or freezing, stability testing should be in real time at the specified storage temperature, for at least the requested shelf life. The time out of refrigeration (which also includes time out of the freezer) during normal manufacturing processes, up to the point of return to the fridge or freezer following labelling and packaging, should have been defined and justified. From that point onward, all storage and shipping conditions should be justified by the real-time stability data; the data for justifying any temperature excursions should include real-time studies of the proposed excursion followed by return to the normal storage conditions for the remainder of the shelf life.
- If the changes proposed are to the drug product and may affect bioavailability of the product, comparative bioavailability data.
 - If bioavailability data are required and are submitted to support the change, the application becomes a Category 1 application.

- If the change is likely to affect critical quality parameters, data from comparability studies on pre-variation and post-variation drug substance or drug product.
- If the change is approved, an updated [CPD document](#).
- Appropriate validation data (including revised viral load reduction claims), where a change is to a process involved in viral reduction.

1.5 Drug product specifications or test changes



Certified product details (CPD) documents

For many biological medicines, critical tests are conducted on the drug substance and not repeated on the drug product because of low concentrations of the drug substance or interference by excipients.

If any of the notification requests below result in changes to the drug substance or drug product specifications or the non-pharmacopoeial test methods, please provide a new copy of the entire document, including testing methodology, even if these details have not changed. The CPD document can be provided using the [CPD form](#) available on the TGA website.

1.5.1 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

PMPL: Drug product specification — minor changes to physicochemical test methods and limits

Minor changes to physicochemical tests.

Conditions

- There is no change in test method other than minor changes to existing test methods for physicochemical parameters of the drug product such as pH, density, specific gravity, optical rotation, extractable volume, osmolality, osmolarity or viscosity.
- The test limit must either remain unchanged or be more stringent.

Data requirements

You must submit:

- A summary description of the change, and details of the new method.
- An updated CPD document.

You must generate the following data:

- Appropriate validation data demonstrating the new test is at least equivalent to former procedure.

PSNL: Drug product specification — narrowing of test limits

Revision of the approved specifications for testing of the final drug product, to make the limits applied to test results more stringent.

Conditions

- The new limits must be either the same as, or more stringent than, any applicable standard or guidelines.

Data requirements

You must submit:

- The revised set of specifications.

PSNT: Drug product specification — addition of test and limit

Addition of a new test and limit to the existing specifications.

Conditions

- The additional test must have been previously evaluated by the TGA.
- The proposed limit (release and expiry) should be based on batch analytical data and should comply with, or be more stringent than, any applicable official standard or relevant accepted guidelines for such a test.
- The test method should only be used at a registered quality control testing site that has appropriate GMP clearance.

Data requirements

You must submit:

- Details of the new test method.
- The revised set of drug product specifications (release and expiry).
- An updated [CPD document](#).

You must generate the following data:

- Appropriate validation data for the new test method.

PSPT: Drug product specification — changes resulting from amendments to a TGO or pharmacopoeial requirement.

Changes resulting from amendments to pharmacopoeial requirements or the requirements of Therapeutic Goods Orders.

Conditions

- The new pharmacopoeial monograph or TGO should be suitable for the product.
- The change must not involve changing from the requirements of one pharmacopoeia to those of another.
- Any tests that are performed in addition to those of the pharmacopoeial monograph or TGO must continue to be performed.

- The test method must only be used at a registered quality control testing site that has appropriate GMP clearance.
- If the change involves updating microbiological test requirements for non-sterile products to meet TGO No. 77—Microbiological standards for medicines (TGO 77)², the product should have undergone a risk assessment for objectionable microorganisms, in addition to those specified in the pharmacopoeias that form the basis of TGO 77².
- The change must not be a consequence of any commitment from previous assessments to review specification limits (e.g. made during the procedure for the marketing authorisation application or a variation application) unless the supporting documentation has been already assessed and approved within another procedure.
- The change must not result from unexpected events arising during manufacture e.g. new unqualified impurity; change in total impurity limits.
- The change must be within the range of currently approved limits.
- The test procedure must remain the same, or the changes in the test procedure are minor.

Data requirements

You must submit:

- The revised set of drug product specifications (release and expiry).
- An updated [CPD document](#).
- For updating microbiological test requirements for non-sterile products to meet TGO No. 77², an assurance that the report of the risk assessment for objectionable microorganisms is available for review, if required by the TGA.

You must generate the following data:

- Appropriate validation data must have been generated where applicable.

PSQC: Drug product specification — change to quality control testing equipment

Changes to equipment used for quality control testing of the final drug product (including sterility, microbiological, chemical, physical and bacterial endotoxin or pyrogen testing).

Conditions

- The change must meet any previously approved test method validity criteria.

Data requirements

You must submit:

- A description of the new equipment.
- An updated [CPD document](#).

You must generate the following data:

- Appropriate validation data must have been generated for the changed equipment using the previously approved criteria and, where applicable, the same validation protocol as was used for the previously approved equipment.

² This should be read as the current relevant TGO pertaining to microbiological standards.

- If the type or brand of consumables used with the equipment is critical (that is, included in the protocol), appropriate validation data must also be generated for the relevant consumables.

1.5.2 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

PSSM: Drug product specification — change to sterility test method

Change to sterility test method.

Conditions

- All aspects of the test are in accordance with the requirements of the internationally harmonised test published in the BP, Ph. Eur. or USP and as specified in [TGO 100 - Microbiological standards for medicines 2018](#).
- The test follows the guidelines on particular aspects of the sterility test in [Guidance 17 — Microbial quality of prescription and over-the-counter medicines](#).

Data requirements

You must submit:

- Details of the new test method.
- An updated [CPD document](#).

You must generate the following data:

- Comparative batch data using validated test methods.

1.5.3 Self-assessable requests (SARs) that create a separate and distinct good (s. 23)

These variations fall under s. 23 of the [Therapeutic Goods Act 1989](#) because they create a separate and distinct good. However, the existing AUST R number can be retained under the provisions of the [Therapeutic Goods \(Groups\) Order No. 1 of 2001](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

All other formulation changes require the submission of data for TGA evaluation. See [PFCE: Formulation changes \(BM\) – Retaining AUST R number](#) or [PFNA: Formulation changes \(BM\) – New AUST R number](#).

DFCI: Formulation - addition or deletion of, or variation to, an inked imprint

Inked imprints on a solid oral dosage form may be added, deleted or varied through self-assessment.

Requires update to ARTG data: Formulation.

Note: If the proposed change is to the inking pattern, but the same ink is used, this represents a change to an existing ARTG entry — see [PMDS: Drug product manufacture – changes to dimensions, shape, inked imprint, embossing or debossing of solid dosage forms](#).

Conditions

- Any new colour or ink should be in the current TGA list of colours permitted for use in medicines for ingestion (see [Colourings used in medicines for topical and oral use](#)), and should comply with the specifications in that list.
- Any new proprietary excipient to be used must already be present in another prescription medicine registered on the ARTG.
- If relevant, the drug product specification should be revised to incorporate any change in product description.
- The new markings do not reduce product differentiation or cause confusion.

Data requirements

You must submit:

- A comparative list of the current and new product formulations.
- Information on use or non-use of human embryos or human embryonic stem cells, or other material sourced from human embryos or human embryonic stem cells, in the manufacture of the product (this is a requirement under Regulation 9B of the [Therapeutic Goods Regulations 1990](#)).
- The revised product description (if this has changed), incorporated into the revised set of drug product specifications (release and expiry).
- The ingredient number for the new proprietary excipient, together with the ARTG number of the existing good that contains that ingredient, if relevant.
- An updated [CPD document](#) that incorporates the changes, if applicable.
- Revised labels, if applicable.
- A clean copy of the PI must be provided. Where the proposed change would involve amendment of a PI, a marked-up copy should also be provided.

Associated changes

You may need to update other information about your medicine as a result of the changes to the inked imprint. Associated variation types that you can include with DFCI are:

- [ZFSM: ARTG data - Manufacturer changes associated with DFCI or DFFC](#)
- [ZFSV: ARTG data - Visual identification changes associated with DFCI or DFFC](#).

DFFC: Formulation - — change of colouring agent, flavour or fragrance

Certain changes to, or addition or deletion of, colouring agents, flavour or fragrance of a product may be made through self-assessment.

Requires update to ARTG data: Formulation. Where a consequential change is required to visual identification ARTG data, see variation type DFVI.

Note: If the colouring agent, flavour or fragrance is present at more than 2% w/w or w/v, this requires evaluation of data. See variation type [PFCE: Formulation – changes \(BM\) – Retaining AUST R number](#).

Conditions

- The colouring agent, fragrance or flavour is present in the formulation at not more than 2% w/w or w/v.
- Any new colour is listed in the current TGA list of colours permitted in medicines for oral use, and complies with the specifications in the same list (see [Colourings used in medicines for topical and oral use](#)).
- Any new proprietary excipient to be used must already be present in another prescription medicine registered on the ARTG.
- There are only changes to, or addition or deletion of excipients that are colours, flavours or fragrances. You should consider if the formulation of a proprietary excipient contains excipients that are not colours, flavours or fragrances.
- If relevant, the drug product specifications (release and expiry) should be revised to incorporate any new product description or other organoleptic properties of the product.

Data requirements

You must submit:

- The ingredient number for the new proprietary excipient, together with the ARTG number of the existing good that contains that ingredient, if relevant.
- A comparative list of the current and new product formulations.
- Information on use or non-use of human embryos or human embryonic stem cells, or other material sourced from human embryos or human embryonic stem cells, in the manufacture of the product (this is a requirement under Regulation 9B of the [Therapeutic Goods Regulations 1990](#)).
- An updated [CPD document](#) for the product that incorporates the changes, if applicable.
- A clean copy of the PI must be provided. Where the proposed change would involve amendment of a PI, a marked-up copy should also be provided.

You must generate the following data:

- Relevant comparative data of the type listed below should have been generated for the dosage form manufactured using the new and old formulations.
- At least three recently manufactured batches of the pre-variation product and one production batch of the post-variation product should be tested, preferably at the same time and using the same method. The second and third batches manufactured under the new conditions, if not available at the time of application, should be tested, and the results should be reviewed by the sponsor as soon as they become available. The TGA should be notified of any differences as a priority. The following data (where applicable) is to be provided for each batch of the product to be tested:
 - All solid dosage forms (for example, tablets, capsules, compressed suppositories and pessaries) must have similar comparative dissolution profiles — that is, the similarity factor, f_2 , should be between 50 and 100. These data are not required if the API is in solution at any stage during manufacture of the drug product, or if it is in solution in the drug product or present as liquid globules.
 - For semi-solid and liquid products (for example, ointments, creams, lotions, oral liquids, moulded suppositories and pessaries), comparative batch data using appropriate methodology should demonstrate that there has been no change to the

particle size distribution and polymorphic form of the drug substance in suspension. These data are not required if the drug substance is in solution at any stage during manufacture of the drug product, or if it is in solution in the drug product or present as liquid globules.

- A stability test on the reformulated product should have begun on at least one production-scale batch, and should begin on the second and third batches as they become available. If the results of the stability test do not meet the specifications, the TGA should be notified immediately, and the reformulated product may be withdrawn from the market at the TGA's discretion.

Associated changes

You may need to update other information about your medicine as a result of the changes to the colour, flavour or fragrance. Associated variation types that you can include with DFFC are:

- [ZFSM: ARTG data - Manufacturer changes associated with DFCI or DFFC](#)
- [ZFSV: ARTG data - Visual identification changes associated with DFCI or DFFC](#).

1.5.4 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

IPCS: Drug substance and drug product — changes to specifications or test methods

Any proposed changes to the specifications or test methods of the drug substance or drug product can be submitted as part of this Category 3 variation type. This includes changes to, or removal of, a test method, or changes to specifications.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- A copy of the revised specifications; where relevant, this should be consolidated to apply to all sites of drug substance manufacture.
- Justification for the proposed changes, including any changes to test procedures. Data demonstrating the equivalence of the alternative and/or pharmacopoeial methods may also be required, if relevant.
- Validation of any changed test procedures (including microbiological tests, if applicable).
- Certificates of analysis for three representative batches (preferably sequential batches) of the bulk drug substance or drug product, demonstrating the manufacturer's ability to meet the revised specifications. Where the expiry specifications change, stability data may be necessary.
- If the change is approved, an updated [CPD document](#).

1.5.5 Category 3 requests — Data evaluation required under s. 23 (separate and distinct good) – Retaining AUST R number

These variations fall under s. 23 of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

PFCF: Formulation changes (BM) – Retaining AUST R number

Please contact the TGA for advice before using this variation type. If you select this variation you will need to provide a copy of the written advice from the TGA advising that this variation type can be used.

Some minor formulation changes with no clinical impact may be submitted as a Category 3 application.

However, many changes to the formulation of a biological medicine require evaluation of clinical and nonclinical data. These types of variations should be submitted as Category 1 applications.

Requires update to ARTG data: Formulation.



The AUST R number can be retained

Under s. 16(1) of the [Therapeutic Goods Act 1989](#), a change in formulation means that the reformulated product is a separate and distinct good from the existing product, and this requires a new ARTG entry.

However, the provisions of the [Therapeutic Goods \(Groups\) Order No. 1 of 2001](#) allow the AUST R number of the existing product to be retained for the new product if the new product replaces the existing product, for certain types of formulation changes.

The following formulation changes allow the current AUST R number to be retained:

- removal or addition of fragrance, flavour, ink or colour
- change in existing quantity of excipient (but not total removal).

Any other formulation changes will result in a new AUST R number, see variation type [PFNA: Formulation changes \(BM\) – New AUST R number](#).

Conditions

- An excipient can only be removed from the formulation if it is a flavour, ink or colour.

Data requirements

This list of what to submit is not exhaustive. You must submit:

- A copy of the written advice from the TGA advising that this variation type can be used.

Associated changes

You may need to update other information about your medicine as a result of the changes to the excipients in the formulation. Associated variation types that you can include with PFCF are:

- [ZFRC: ARTG data – Container and shelf life changes associated with DFCE/PFCF or DTTR – Retaining AUST R number](#)

- [ZFRM: ARTG data – Manufacturer changes associated with DFCF/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRN: ARTG data – Good name changes associated with DFCF/PFCF – Retaining AUST R number](#)
- [ZFRO: Other consequential changes to the dossier associated with DFCF/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRP: ARTG data – Pack size and poison schedule changes associated with DFCF/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRS: ARTG data – Sterility changes associated with DFCF/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRV: ARTG data – Visual identification changes associated with a result of DFCF/PFCF or DTTR – Retaining AUST R number.](#)

1.5.6 Category 3 requests — Data evaluation required under s. 23 (separate and distinct good) – New AUST R number

These variations fall under s. 23 of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

PFNA: Formulation changes (BM) – New AUST R number

Please contact the TGA for advice before using this variation type. You will need to provide a copy of the written advice from the TGA advising that this variation type can be used.

Some minor formulation changes with no clinical impact may be submitted as a Category 3 application.

However, many changes to the formulation of a biological medicine require evaluation of clinical and nonclinical data. These types of variations should be submitted as Category 1 applications.

Requires update to ARTG data: Formulation.



The AUST R number cannot be retained

Under s. 16(1) of the [Therapeutic Goods Act 1989](#), a change in formulation means that the reformulated product is a separate and distinct good from the existing product, and this requires a new ARTG entry. The [Therapeutic Goods \(Groups\) Order No. 1 of 2001](#) only applies for certain types of formulation changes.

For formulation changes that allow the AUST R number to be retained, see variation type [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#).

Conditions

- Data is submitted as described below.

Data requirements

This list of what to submit is not exhaustive. You must submit:

- A copy of the written advice from the TGA advising that this variation type can be used.

Associated changes

You may need to update other information about your medicine as a result of the changes to the formulation. Associated variation types that you can include with PFNA are:

- [ZENC: ARTG data – Container and shelf life changes associated with DFNA/PFNA – For the new AUST R number](#)
- [ZENM: ARTG data – Manufacturer changes associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZENN: ARTG data – Good name changes associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZENO: Other consequential changes to the dossier associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZENP: ARTG data – Pack size and poison schedule changes associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZENS: ARTG data – Sterility changes associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZENV: ARTG data – Visual identification changes associated with DFNA/PFNA or PCCT – For the new AUST R number.](#)

1.6 In-house reference standard changes**1.6.1 Notifications**

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

IRSR: In-house reference standard — replacement

Replacement of an in-house reference standard.

Conditions

- The TGA should have explicitly approved the protocol and acceptance criteria including traceability for establishing a replacement standard. The protocol should have been submitted with the application for registration or a subsequent [Category 3 application to change the in-house reference standard](#). This also includes a change in shelf life of the reference standard.

Data requirements

You must submit:

- Details of the new reference standard, including assigned values.
- The reference to the TGA approval of the protocol (that is, TGA submission number).
- The proposed date of implementation.
- An updated [CPD document](#).

1.6.2 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

IRNA: In-house reference standard — changes

Any proposed changes to in-house reference standards can be submitted as part of this Category 3 variation type.

This applies to the introduction of a new reference standard (that is, a reference standard that has not been previously approved by the TGA) or an additional reference standard.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Description of the proposed change.
- Justification for the proposed change, including changes to test procedures.
- Appropriate validation data.
- If the change is approved, an updated [CPD document](#), if relevant.

1.7 Purification process changes

1.7.1 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

PPCR: Purification process — column life reduction

Reduction in the approved column life for columns used in the purification process.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- A scientific justification for the column life reduction.

PPHR: Purification process — holding time reduction for a non-plasma-derived product

Reduction in the holding time for the drug substance, or intermediates created during manufacture of the drug substance, where the final drug product is non-plasma derived.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- A scientific justification for the holding time reduction.

1.7.2 Other purification process changes

Other purification process changes require the TGA to evaluate data. See:

- [APMP: Manufacturing – changes to the manufacturing process of a drug substance and drug product](#)

1.8 Filling changes**1.8.1 Self-assessable requests (SARs)**

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

FLIS: Filling — introduction of a similar filling line

Introduction of a similar filling line.

Conditions

- The new filling line should be similar to the existing filling line.
- There should be no modifications to the procedure, and the previously approved validation criteria (including validated aseptic holding and filling times) and/or release specifications should be met.
- This can include upgrades to an existing filling line.

Data requirements

You must submit:

- General details of the new/upgraded filling line.

1.8.2 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

PFCP: Filling — changes to drug product filling

Any proposed changes to filling processes can be submitted as part of this Category 3 variation type. The types of changes to filling processes for which evaluation of data is required include:

- change to in-process controls

- change in filling equipment that involves use of equipment significantly different from that used previously and that does not involve upgrade of an existing filling line
- increase in filling time.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Description of the proposed change.
- Justification for the proposed change, including changes to test procedures.
- Appropriate validation data.
- If the drug substance is sterile and undergoes no further sterilisation, supporting data for changes to filling time or storage of sterile bulk drug substance. Appropriate validation data to support an increase in filling time should be provided.

1.9 Changes to storage of drug substance

1.9.1 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

ASRS: API storage conditions — reduction in shelf life

Reduction in shelf life.

Conditions

- The change must not be due to unexpected events arising during manufacture or because of stability concerns.

Data requirements

You must submit:

- Details of the new shelf life.
- A reason for the planned reduction in shelf life.

1.9.2 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

ACDM: API storage conditions — change of storage container dimensions or manufacturer

Change in dimensions or manufacturer of storage container.

Conditions

- The surface area in contact with the product should not change.
- The dimensions of the storage container should only increase by 50% or less.
- There should be no change to the container material.

Data requirements

You must submit:

- Details of the change.
- Justification for the change.
- An assurance that stability studies have been conducted.

1.9.3 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

DDSL: Shelf life — changes to shelf life or storage conditions of the drug substance

Any proposed changes to the shelf life or storage conditions of the drug substance or drug product can be submitted as part of this Category 3 variation type.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Real-time stability data on at least three production-scale batches to support the change. Data from fewer batches or pilot-scale batches may be acceptable, if justified. Shelf life will not be assigned based on accelerated testing.
- If the change is approved, an updated [CPD document where applicable](#).

1.10 Changes to storage of drug product



Stability testing

For biological medicine products requiring refrigeration or freezing, stability testing should be in real time at the specified storage temperature, for at least the requested shelf life.

The time out of refrigeration (which also includes time out of the freezer) during normal manufacturing processes, up to the point of return to the fridge

or freezer following labelling and packaging, should have been defined and justified. This should be based on worst-case storage scenarios and include storage conditions inherent in the manufacturing process and transport.

From that point onward, all storage and shipping conditions should be justified by the real-time stability data:

- The data for justifying any temperature excursions should include real-time studies of the proposed excursion followed by return to the normal storage conditions for the remainder of the shelf life.

Refer to guidance on [Stability testing for prescription medicines](#) for requirements for stability testing of biological medicines.

1.10.1 Correction to, or completion of, an ARTG entry

Sponsors can request corrections to ARTG entries under s. 9D(1) of the [Therapeutic Goods Act 1989](#). Alternatively, the Secretary can make corrections to ARTG entries under s. 9D(1), at his or her initiative. Refer to the [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#) for further information.

CASL: Correct an ARTG entry – shelf life / storage condition

Requires update to ARTG data: Container & Shelf Life.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

1.10.2 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

PSLD: Drug product storage conditions — reduction in shelf life

Reduction in shelf life.

Requires update to ARTG data: Container & Shelf Life.

Conditions

- The change must not be due to unexpected events arising during manufacture or because of stability concerns.

Data requirements

You must submit:

- Details of the new shelf life.
- A reason for the reduction in shelf life.

PSET: Drug product storage conditions — changes to excursion temperature during manufacture

Changes to excursion temperature during manufacture.

Conditions

- The change is one of the following:
 - a removal of an excursion temperature
 - a reduction in the time spent out of refrigeration, including time out of the freezer.
- All other changes to the excursion temperature require the TGA to evaluate the data. See [PSLC: Shelf life – changes to shelf life or storage conditions of a drug product](#).

Data requirements

You must submit:

- Details of the change.

PSAR: Drug product storage conditions — Addition of a restrictive shelf life or storage condition

Addition of a restrictive shelf life or storage condition.

Requires update to ARTG data: Container & Shelf Life.

Conditions

- The change must be to a more restrictive shelf life or storage conditions.

Data requirements

You must submit:

- Details of the change.
- The reason for the change.

1.10.3 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

PSLC: Shelf life — changes to shelf life or storage conditions of a drug product

Any proposed changes to the shelf life or storage conditions of the drug product can be submitted as part of this Category 3 variation type.

Requires update to ARTG data: Container & Shelf Life.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Real-time stability data on at least three production-scale batches to support the change. Data from fewer batches or pilot-scale batches may be acceptable, if justified. Shelf life will not be assigned based on accelerated testing.
- For multi-dose products (drug product only):
 - Results of antimicrobial preservative efficacy testing, in accordance with the requirements of [TGO 100 - Microbiological standards for medicines](#) to support changes to the closed shelf life.
 - Results of simulated in-use testing to support changes to the open in-use shelf life. Details on this testing are provided in [Guidance 17: Microbial quality of prescription and over-the-counter medicines](#).
- For drug products that are to be reconstituted or diluted before use, data to support changes in the storage periods and conditions if the conditions are specified to be longer than 24 hours at 2–8°C or 6 hours at room temperature:
 - Appropriate microbiological data consists of microbiological challenge experiments similar to preservative efficacy testing. Ideally, the results should show evidence of microbial death, but demonstration of stasis (that is, not more than 0.5 log₁₀ units higher than the initial value of the inoculum) over the proposed storage period is the minimum requirement.
 - Chemical and physical data showing the stability of the reconstituted product are also required.
- Revised labelling for drug products, if the storage conditions are to be changed.
- Where the proposed change to a drug product would involve approval of an amended PI, details of the amended PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).
- If the change is approved, an updated [CPD document](#).

1.11 Fermentation process changes

1.11.1 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

FPFM: Fermentation — change of filter manufacturer

Change to the manufacturer of the filter used in the fermentation process.

Conditions

- Do not change the internal process controls.
- Do not use the filter for steps that require viral safety validation.
- The new filter meets the same acceptance criteria as the previous filter.
- The new internal process controls for the filtrate have not been changed.

Data requirements

You must submit:

- The reason for the change.
- The new manufacturer's details.

FPNC: Fermentation — more stringent internal process controls

Introduction of more stringent internal controls on the fermentation process.

Conditions

- Do not change the quality characteristics of the product.

Data requirements

You must submit:

- The reason for the change.
- Details of the new internal process controls.

FPRP: Fermentation — reduction in fermentation period

Reduction in the fermentation period, i.e. the time required to culture and harvest the cell line.

Conditions

- Reducing the fermentation period must not change the batch size.
- Do not change the internal process controls.

Data requirements

You must submit:

- The reason for the change.
- Details of the change.

1.11.2 Other fermentation process changes

Other fermentation process changes require the TGA to evaluate data. See:

- [APMP: Manufacturing – changes to the manufacturing process of a drug substance and drug product.](#)

1.12 Plasma Master File changes

1.12.1 Changes that do not require prior approval

These changes can be implemented before you inform the TGA of the change. Reporting to the TGA should be made in writing, together with any relevant documentary evidence required in support and the date of implementation advised. No specific form is required. This process cannot be used if the proposed changes require a consequential change to the approved product information of the registered medicine.

See information on changes that do not require prior approval in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

Plasma - master file changes

The following changes are included in annual updates to plasma master files and therefore do not require separate notification to the TGA:

- addition or removal of collection centres for a currently approved collection organisation (see [Guidance 9: Therapeutic goods that contain or are produced from human blood or plasma](#))
- change of sites for testing of individual donations
- change of tests for testing individual donations.

1.12.2 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

PMFC: Plasma — master file changes

Any proposed changes to plasma master files can be submitted as part of this Category 3 variation type. This section also applies to albumin when it is used as an excipient. The format of the plasma master file should comply with the EMA guidance document [EMA/CPMP/BWP/3794/03 Guideline on the Scientific Data Requirements for a Plasma Master File \(PMF\)](#), which has been adopted by the TGA.

Evaluation of data by the TGA is required for the following types of changes:

- country of origin of plasma
- include a new organisation acting as a supplier of plasma (addition of a new collection site within an organisation can be provided in the PMF annual update)
- tests and site of viral testing of manufacturing plasma pool
- manufacturing pool size or number of donations per pool
- hold times for plasma
- donor selection/exclusion criteria
- donation quarantine period.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Description of the proposed change.
- Justification for the proposed change, including changes to test procedures.
- Appropriate validation data.

1.13 Plasma fractionation intermediates changes

1.13.1 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

PFCCR: Plasma — changes to fractionation intermediates — column life reduction

Reduction in the approved column life for columns used in plasma fractionation.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the change.
- A justification for the proposed reduction.

PFSC: Plasma — changes to fractionation intermediates — more stringent internal process control

Introduction of more stringent internal controls on the plasma fractionation process.

Conditions

- Do not change the quality characteristics of the product.

Data requirements

You must submit:

- Details of the change.
- The reason for the change.

1.13.2 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

PFIC: Plasma — changes to fractionation intermediates

Examples of types of changes to plasma fractionation intermediates that require evaluation of data by the TGA include changes to:

- filter manufacturer
- batch size
- increase in hold times
- equipment
- addition or deletion of, or change to, a step
- increase in column life
- shelf life for storage of intermediate
- manufacturer (for example, alternative supplier of an intermediate, with no change in the method of fractionation).

A change in the method of fractionation may require supporting clinical data, and would be a Category 1 application

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Description of the proposed change.
- Justification for the proposed change, including changes to test procedures.
- Appropriate validation data.

1.14 Product information (PI) changes: Quality aspects, corrections and self-assessable requests (SARs)

The changes listed here are to the quality aspects of the product information, corrections to the PI and SARs. For safety related requests and minor editorial changes see [Part 2: Product information \(PI\) changes](#).



Consequential changes to the product information

Changes to the PI that are a consequence of a quality change **do not** require a separate variation type to be selected. These PI changes should be submitted with the quality change request. See Consequential changes to the product information that result from variations to an ARTG entry in [Variations to prescription medicines – excluding variations requiring evaluation of clinical](#)

[or bioequivalence data; Process guidance.](#)

A single PI often refers to multiple ARTG entries (products). If the affected PI refers to additional ARTG entries that are not selected in Variation e-form then these additional ARTG entries should be listed in the application cover letter and comments field of the Variation e-form. A statement should be included requesting that the PI for these additional products is also varied.

1.14.1 Correction to, or completion of, an ARTG entry

Sponsors can request corrections to ARTG entries under s. 9D(1) of the [Therapeutic Goods Act 1989](#). Alternatively, the Secretary can make corrections to ARTG entries under s. 9D(1), at their initiative. Refer to the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#) for further information.

CAPI: Correct an ARTG entry – Product Information (PI)

Conditions

- The correction does not involve subsection 9D(2) and subsection 9D(3) changes to the PI.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.
- A clean and marked-up copy of the draft revised PI.

1.14.2 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

PIAE: PI — adding the names of excipients in the product

Adding the names of excipients in the product, whether or not those excipients are referred to in the TGO pertaining to labels.

Conditions

- Any included technical information should be accurate and should be obtained from recognised reference sources.
- All names and terminology used in the PI should be Australian approved names or entered in the TGA eBusiness Services code tables.
- Products should not be supplied with a new PI until the change has come into effect.
- The approved amended PI should be updated on the TGA website when the proposed changes come into effect.

Data requirements

You must submit:

- Details of changes to the PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#). If the amendments are necessary because of other regulatory actions that have already been approved or notified, evidence of such approval or notification.

PICA: PI — adding the Chemical Abstracts Service (CAS) number, molecular formula/weight and/or chemical structure/nomenclature of the API

Adding the Chemical Abstracts Service (CAS) number, chemical structure, molecular formula, molecular weight and/or chemical name/nomenclature of the API.

Conditions

- Any included technical information should be accurate and should be obtained from recognised reference sources.
- All names and terminology used in the PI should be Australian approved names or entered in the TGA eBusiness Services code tables.
- Products should not be supplied with a new PI until the change has come into effect.
- The approved amended PI should be updated on the TGA website when the proposed changes come into effect.

Data requirements

You must submit:

- Details of changes to the PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#). If the amendments are necessary because of other regulatory actions that have already been approved or notified, evidence of such approval or notification.

PIPD: PI — changing the PI of radiopharmaceuticals to give instructions that the patient dose should be measured immediately before administration**Conditions**

- Any included technical information should be accurate and should be obtained from recognised reference sources.
- All names and terminology used in the PI should be Australian approved names or entered in the TGA eBusiness Services code tables.
- Products should not be supplied with a new PI until the change has come into effect.
- The approved amended PI should be updated on the TGA website when the proposed changes come into effect.

Data requirements

You must submit:

- Details of changes to the PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

[guidance](#). If the amendments are necessary because of other regulatory actions that have already been approved or notified, evidence of such approval or notification.

PIPS: PI — changing the name, address or other details of the product's sponsor or distributor

Conditions

- Any included technical information should be accurate and should be obtained from recognised reference sources.
- All names and terminology used in the PI should be Australian approved names or entered in the TGA eBusiness Services code tables.
- Products should not be supplied with a new PI until the change has come into effect.
- The approved amended PI should be updated on the TGA website when the proposed changes come into effect.

Data requirements

You must submit:

- Details of changes to the PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#). If the amendments are necessary because of other regulatory actions that have already been approved or notified, evidence of such approval or notification.

PIRI: PI — changing the PI of radiopharmaceuticals to give instructions/ information on radiation protection and safety of user and patient.

These may include radiation shielding data, decay charts, procedures to minimise radiation doses to staff and unintended doses to patients, and references to guidelines and codes of practice relating to radiation protection.

Conditions

- Any included technical information should be accurate and should be obtained from recognised reference sources.
- All names and terminology used in the PI should be Australian approved names or entered in the TGA eBusiness Services code tables.
- Products should not be supplied with a new PI until the change has come into effect.
- The approved amended PI should be updated on the TGA website when the proposed changes come into effect.

Data requirements

You must submit:

- Details of changes to the PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#). If the amendments are necessary because of other regulatory actions that have already been approved or notified, evidence of such approval or notification.

PISR: PI — putting into effect the guidelines in section 20.2 of Guidance 20: Radiopharmaceuticals

Conditions

- Any included technical information should be accurate and should be obtained from recognised reference sources.
- All names and terminology used in the PI should be Australian approved names or entered in the TGA eBusiness Services code tables.
- Products should not be supplied with a new PI until the change has come into effect.
- The approved amended PI should be updated on the TGA website when the proposed changes come into effect.

Data requirements

You must submit:

- Details of changes to the PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#). If the amendments are necessary because of other regulatory actions that have already been approved or notified, evidence of such approval or notification.

1.14.3 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

PICC: PI — changes to quality aspects of the product information

Proposed quality-related changes to the ARTG entry resulting in changes to the PI that are not described above may be submitted as this variation type. However, changes to the PI that are a consequence of a quality change do not require a separate variation type to be selected. These PI changes should be submitted with the quality change request. See Consequential changes to the product information that result from variations to an ARTG entry and Multiple related changes in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

Note that safety-related changes to the PI must be separately submitted as a SRR.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- A description of the proposed changes to the PI.
- Details of changes to the PI, as outlined in the [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).
- Relevant technical data to support the proposed change(s).

1.15 Product label changes



Requirements for labels

Mandatory labelling requirements for prescription medicines are set out in the [Therapeutic Goods Order \(TGO\)](#) that pertains to labels, as amended from time to time. It is the sponsor's responsibility to ensure that their product labels meet any state and territory government requirements.



Multiple related and unrelated changes to the label

Multiple changes to the label may not require the selection of multiple variation types. For information and an example on submitting multiple unrelated changes to medicine labels see [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

Consequential changes to the label (changes to the label that are a consequence of a quality change) **do not** require a separate variation type to be selected. These label changes should be submitted with the quality change request. See Multiple related changes with an example in the process guidance.

1.15.1 Changes that do not require reporting to the TGA

These changes can be implemented without reporting to the TGA. This does not include any proposed changes that require a consequential change to the approved product information of the registered medicine.

You do not need to notify the TGA if you are making the following variations to a label:

- change to AUST R number following an approved change that requires a new AUST R number
- inclusion or removal of, or changes to, sponsor or supplier telephone/facsimile number, email address, barcodes, ABN or Australian Company Number, product code number, patent number, recycle logo and associated text, trademark and other such symbols
- inclusion or removal of date of manufacture of product
- inclusion or removal of foreign national registration number or serialisation pharmacode (e.g. EU pharmacode)
- changes to colours of artwork
- inclusion or removal of, or changes to, name and address of supplier in New Zealand
- change of typeface and increase in font size of print only
- change in web address, without a change in the content of the website
- change to the prefix used for batch and/or expiry details
- change in location of the prefix used for batch and/or expiry details.

Conditions

- There must be strictly no other changes and the minimum letter height requirements of the therapeutic goods order pertaining to labels are still observed.
- A change to barcodes may include 2-D matrix codes but not quick response [QR] codes.
- Other symbols that may be changed include ®, © and ™.
- Any change to the colours of artwork must be made without impairing legibility of labels (and unless colour-coding is used to indicate product strength).
- The prefixes must be one of those stated in Section 6 of the Therapeutic Goods Order No. 91 and the batch number of the medicine must be preceded by the batch number prefix and the expiry date of the medicine is preceded by the expiry date prefix.

1.15.2 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

LPCL: Label — addition or deletion of, or change to, the company logo or livery**Conditions**

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPCL: Label — addition or deletion of, or change to, the pictogram of a product or its dosage form**Conditions**

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.
- The addition or change of a pictogram of a product or its dosage form must only be designed to clarify information about the medicine which is useful for the patient, to the exclusion of any element of a promotional nature.
- The change must not involve removal of information relating to the safe use of the product.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPCS: Label — addition or deletion of, or change to, the name or address of the Australian sponsor or supplier of the product**Conditions**

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.
- The new name or address must be the same as amended on the register.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPDG: Label — deletion of existing graphics, pictures or diagrams, and any associated text**Conditions**

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.
- The change must not involve removal of information relating to the safe use of the product.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPDR: Label — deletion of repeated text (present elsewhere on a label) from selected side panels provided that the information is not mandatory***Conditions***

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPIA: Label — addition of simple instructional/informational/anti-tampering statements, or information about a changed appearance of the dosage form***Conditions***

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPOP: Label — addition or deletion of, or change to, label text of outer protective pouches or overwraps of the container or primary pack***Conditions***

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.
- The new text must not be confusing, promotional or contradictory to text on the container or primary pack labels.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

1.15.3 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

LOAI: Label — addition of a new TGA-approved route of administration for injectable medicines**Conditions**

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.
- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LOCA: Label — changes as a result of approved corrections made to an entry in the ARTG

Proposed changes as a result of approved corrections can be submitted as this variation type. However, for changes to labels as a consequence of another change that are requested at the same time, a separate variation type is not required. For further information and an example see Multiple related changes in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.
- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LOCN: Label — change to names of actives, excipients or dosage forms resulting from changes in the AAN, ingredients database or code tables in TGA eBS**Conditions**

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.
- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LOEI: Label — changes to the method of expressing the content of active ingredients or excipients, in accordance with the current labelling TGO.**Conditions**

- The change is minor, such as changing from '0.5 mg' to '500 micrograms'.
- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work

or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LOPR: Label — changes as a result of product rescheduling (following from changes to the Poisons Standard)

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.
- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LOPS: Label — amendments due to implementation of changes that do not require prior approval from the TGA.

Refer to this guidance for the types of variations included within 'Changes that do not require prior approval' from the TGA. For information about reporting on changes that do not require prior TGA approval see [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.
- The change can apply to manufacturers who are also product sponsors.
- The change to the address is allowable provided the actual site location does not change.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and

indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LOSA: Label — amendments resulting from the implementation of a SAR that is either submitted simultaneously or has been previously approved by the TGA

Proposed changes as a result of approved SARs can be submitted as this variation type. However, for changes to labels as a consequence of another change that are requested at the same time, a separate variation type is not be required. For further information and an example see Multiple related changes in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.
- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LOTG: Label — changes to comply with current TGOs for labels that have previously been evaluated and approved by the TGA.

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one

representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LPCO: Label — addition/deletion of, or change to, the statement of country of origin or manufacture for imported products

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.
- The change results from a requirement by other relevant Australian legislation.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPDL: Label — changes to the colour, design or layout of labels with no change to content and retaining differentiation of strengths

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPSP: Label — change to the layout or design of a physician sample pack

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

- May include changes in content if this is to ensure compliance with Australian pharmaceutical industry codes of conduct.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LPWS: Label — addition or deletion of, or change to, the website address of an Australian owned and managed company**Conditions**

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.
- For addition of, or changes to, a company website address, an assurance that the sponsor has full control over the content of the site.

LQAB: Label — addition of excipients

Inclusion of the names of excipients on the medicine label, regardless of whether the substances must be declared on a label to comply with a Ministerial standard.

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LQBM: Label — amendment of expression of API content in topical preparations as previously approved

Amendment to the expression of the proportion of active ingredient in a topical preparation.

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LQHB: Label — addition of 'hypotonic', 'hypertonic' and 'isotonic' for large-volume injections

Addition of the terms hypotonic, hypertonic and isotonic on the labels of large-volume injections.

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LQRB: Label — addition of a previously approved release rate for transdermal patches

Addition of an approved release rate on the label of medicines that are transdermal patches.

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.
- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

LWAB: Label — addition of a warning or cautionary statement where an incorrect route for method of administration is hazardous

Addition of a warning or cautionary statement to a medicine label, to indicate that an incorrect route or method of administration may be hazardous.

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

LWSB: Label — changes to/addition of a warning or precaution statement resulting from an approved safety-related variation to the PI

Change to, or addition of, a warning or cautionary statement on the medicine label, resulting from or relating to a safety-related variation to the entry in the Register for the product made by the Secretary under subsection 9D(2) of the Act, and an associated variation to the Product Information for the product made by the Secretary under subsection 25AA(4) of the Act.

Conditions

- There must be no other changes to the label made under this change request.
- The changes must ensure continued compliance with the relevant TGO pertaining to labels and not contravene labelling best practice.

Data requirements

You must submit:

- Copies of the existing labels (with tracked changes) and final copies or mock-ups of the amended labels (for each strength, where applicable) which include any logos, design work

or graphics. The copies must be to scale and verify the size/dimensions of the labels and indicate the colours to be used. Where there are multiple pack sizes available, one representative label can be provided (for each strength), as long as the only difference between the labels is the pack size.

- For changes to labels resulting from other regulatory actions that have been either already notified or approved, appropriate evidence of the notification or approval (such as a TGA submission number).

1.15.4 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

LCDE: Label changes — any changes requiring data for evaluation

Any proposed changes to the label can be submitted as part of this Category 3 variation type.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Description of the proposed changes.
- Copies of both the currently approved labels and the changed labels. The proposed labels should meet the format requirements of [Module 1.3.3 of the CTD format](#) to the stated scale.

1.15.5 Category 3 requests — Data evaluation required under s. 23 (separate and distinct good) – Retaining AUST R number

These variations fall under s. 23 of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

DTTR: Trade name replacement – Retaining AUST R number

Replacement of trade name.

Requires update to ARTG data: Good Name.



The AUST R number can be retained

Under s. 16(1) of the [Therapeutic Goods Act 1989](#), a change in trade name means that the renamed product is a separate and distinct good from the existing product, and this requires a new ARTG entry. However, the provisions of the Therapeutic Goods (Groups) Order No. 1 of 2001 allow the AUST R number of the existing product to be retained for the new product, if the new product replaces the existing product.

Conditions

- Only the trade name — not the nonproprietary name of the drug substance — can be changed under this application type.

- The details of the product, including indications and sponsor, should remain the same.

Data requirements

You must submit:

- Proposed replacement trade name.
- The revised label.
- Information on use or non-use of human embryos or human embryonic stem cells, or other material sourced from human embryos or human embryonic stem cells, in the manufacture of the product (this is a requirement under Regulation 9B of the [Therapeutic Goods Regulations 1990](#)).
- A clean copy of the PI. Where the proposed change would involve approval of a new PI, a marked-up copy should also be provided.

Associated changes

You may need to update other information about your medicine as a result of the changes to the trade name. Associated variation types that you can include with DTTR are:

- [ZFCR: ARTG data – Container and shelf life changes associated with DFCE/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRM: ARTG data – Manufacturer changes associated with DFCE/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRO: Other consequential changes to the dossier associated with DFCE/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRP: ARTG data – Pack size and poison schedule changes associated with DFCE/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRS: ARTG data – Sterility changes associated with DFCE/PFCF or DTTR – Retaining AUST R number](#)
- [ZFRV: ARTG data – Visual identification changes associated with a result of DFCE/PFCF or DTTR – Retaining AUST R number](#)

1.16 Pack size changes

1.16.1 Correction to, or completion of, an ARTG entry

Sponsors can request corrections to ARTG entries under s. 9D(1) of the [Therapeutic Goods Act 1989](#). Alternatively, the Secretary can make corrections to ARTG entries under s. 9D(1), at his or her initiative. Refer to the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#) for further information.

CAPS: Correct an ARTG entry – pack size & poison schedule

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

1.16.2 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

Pack size definitions

For products presented as:

- **discrete dosage units** (for example, tablets, capsules, compressed or moulded suppositories, pessaries, or other single-dose medicine inside a unit container), the pack size is the number of units in the container.
- **non-sterile solid, powder, semi-solid and liquid products**, the pack size is the weight or volume of the container contents.
- **injections** and other **sterile preparations**, the pack size is the number of ampoules, vials, prefilled syringes, bags, bottles and so on per primary pack (carton).
- **transdermal patches**, the pack size is the number of patches per primary pack (carton).
- **pressurised metered-dose preparations** or **dry powder inhalers**, the pack size is the nominal number of doses in the container.
- **non-pressurised metered-dose preparations**, the pack size is the minimum number of doses in the container, or the volume or weight of the container contents.



Volume of fill of a sterile product is defined as the nominal volume of solution in the container, the total content of which represents the strength of the product as listed on the label. It may include an overfill.

Inclusion of a new volume of fill, or a change in the existing nominal volume of fill of an injection or a peritoneal dialysis solution is considered under the legislation as a change in product strength and requires a Category 1 application.

PPRU: Pack size — reduction of number of units in pack size excluding volume of fill of injections or other sterile preparations

Reducing the number of units (vials, syringes, ampoules, cartridges) in a pack.

Requires update to ARTG data: Pack Size & Poison Schedule.

Conditions

- The change should not be a change in the volume of fill of an injection or other sterile preparation.
- The change should be the result of either of the following:
 - Pharmaceutical Benefits Advisory Committee recommendation (including a larger pack size)
 - to introduce a smaller pack size; or
 - deletion of an existing pack size that is no longer to be supplied.
- The change in pack size should not be accompanied by changes to dosage regimen or indications.
- The label for the new pack size should be the same as for the current pack size, except for quantity of goods or other changes allowed in other sections of this document.
- The additional or changed pack size should be consistent with the treatment recommendations in the PI.
- The container material, size and shape should be either unchanged, or changed in a manner permitted in this document.

Data requirements

You must submit:

- Relevant details regarding the change in pack size.
- A copy of the label for the new pack size, as appropriate.
- Where the proposed change would involve approval of an amended PI, details of changes to the PI.

1.16.3 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

PSCA: Packaging — change to or addition of pack size

Any proposed changes to the pack size can be submitted as part of this Category 3 variation type.

Requires update to ARTG data: Pack Size & Poison Schedule.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the new or additional pack size and the rationale for its introduction.
- Revised labelling, if applicable.

- Where the proposed change requires an update to the PI, details of the amended PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

1.17 Drug product packaging changes

1.17.1 Correction to, or completion of, an ARTG entry

Sponsors can request corrections to ARTG entries under s. 9D(1) of the [Therapeutic Goods Act 1989](#). Alternatively, the Secretary can make corrections to ARTG entries under s. 9D(1), at his or her initiative. Refer to the [Variations to prescription medicines - excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#) for further information.

CACI: Correct an ARTG entry — container information

Requires update to ARTG data: Container & Shelf Life.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

1.17.2 Notifications

These variations fall under section 9D(2C) of the [Therapeutic Goods Act 1989](#).

Conditions that are outlined below the description of each variation type must be met for the request to be processed as a notification.

PPAT: Packaging — introduction of anti-tamper packaging (materials not in contact with drug product)

Introduction of anti-tamper packaging for the drug product.

Conditions

- The packaging materials should not be in contact with the product.

Data requirements

You must submit:

- Details of the change.

1.17.3 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

CCPC: Packaging — changes

Most proposed changes to packaging can be submitted as part of this Category 3 variation type. This includes container shape, size and material, as well as any measuring or delivery device included in the pack, but excludes container type. It also refers to relevant aspects of packaging of diluents, kits and other product components. For changes to container type see [PCCT: Packaging — changes to container type – New AUST R number](#).

Requires update to ARTG data: Container & Shelf Life.

Note: If your entry allows the medicine container to be made of alternative materials (for example glass and plastic ampoules; PVCD/ aluminium and PVC/ aluminium blisters) you will need to include separate Container & Shelf Life details for each container material. Include these details in both the cover letter and the comments field of the application.

Conditions

- Any change in the material contacting the product will require evidence of biomaterial safety testing and stability data.
- Changes to the container/closure system will require container/closure integrity testing.

Data requirements

You must submit:

- Specifications of the packaging and packaging materials.
- If relevant, biomaterial safety evidence that any new polymeric or rubber packaging materials used that are in contact with the product are free from any leachable toxic impurities and comply with BP/Ph. Eur./USP and Australian requirements for polymeric materials used in packaging of medicines.
- Relevant stability data if the packaging may be expected to be less protective than the currently approved packaging or if the change may affect the stability of the product; otherwise, a commitment to generate such data according to relevant stability guidelines and in accord with GMP requirements. Comparative moisture permeability data of the current and proposed container/closure system may be required.
- If the container/closure system is a child-resistant package or is implied by its presentation to be a child-resistant package, a declaration that the re-closable package meets all of the requirements of the current TGO on child-resistant packaging. State in the declaration which of the recognised international standards on child-resistant packaging the closure complies with, and include evidence of adequate directions for opening and reclosing the package.
- Validation data on the changed measuring/delivery system in the pack.
- For sterile products, sterile manufacture information and sterility testing data, as appropriate, including (for example) validation of aseptic media fills and preservative efficacy test data.
- Revised labelling, instructions for use and any other appropriate information or data that relate to the change, if applicable.
- Where the proposed change would require an update to the PI, details of the amended PI, as outlined in the [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

1.17.4 Category 3 requests — Data evaluation required under s. 23 (separate and distinct good) – New AUST R number

These variations fall under s. 23 of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

The changes listed here are representative, rather than exhaustive.

PCCT: Packaging — changes to container type – New AUST R number

Any proposed changes to the container type can be submitted as part of this Category 3 variation type.

Requires update to ARTG data: Container & Shelf Life.



The AUST R number cannot be retained

Under s. 16(1) of the [Therapeutic Goods Act 1989](#), a change in container type means that the repackaged product is a separate and distinct good from the existing product, and this requires a new ARTG entry. The provisions of the [Therapeutic Goods \(Groups\) Order No. 1 of 2001](#) do not apply so it is not possible for the current AUST R number to be used for the new product.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Description and relevant specifications of container/closure system and materials.
- The proposed shelf life and storage conditions in the new container type.
- Stability data (including physical, chemical and microbiological aspects, as applicable) from at least three production-scale batches, to confirm the stability of the product in the proposed new container. Stability data obtained only from pilot scale batches should be justified.
- Information on use or non-use of human embryos or human embryonic stem cells, or other material sourced from human embryos or human embryonic stem cells, in the manufacture of the product (this is a requirement under Regulation 9B of the [Therapeutic Goods Regulations 1990](#)).
- For sterile products, information on sterile manufacture, validation of sterilisation processes, preservative efficacy data and sterility testing data, as appropriate.
- If relevant, biomaterial safety evidence may be required. This is assessed on a case-by-case basis.
- For non-sterile products, details of the revised manufacturing process in the new container, together with process validation data, if appropriate.
- Proposed labels for the product in the new container type.
- A clean copy of the PI. Where the proposed change would involve approval of a new PI, a marked-up copy should also be provided, as outlined in the [Variations to prescription](#)

[medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance.](#)

Associated changes

You may need to update other information about your medicine as a result of the changes to the container. Associated variation types that you can include with PCCT are:

- [ZFNМ: ARTG data – Manufacturer changes associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZFNN: ARTG data – Good name changes associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZFNO: Other consequential changes to the dossier associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZFNP: ARTG data – Pack size and poison schedule changes associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZFNS: ARTG data – Sterility changes associated with DFNA/PFNA or PCCT – For the new AUST R number](#)
- [ZFNV: ARTG data – Visual identification changes associated with DFNA/PFNA or PCCT – For the new AUST R number.](#)

1.18 Changes specific to influenza vaccines



Influenza vaccines

Some of the processes for regulating quality-related changes to influenza vaccines are different from the processes for other vaccines. This is because of the changing nature of the vaccine virus strains.

This section may also be applicable to new vaccines that have similar requirements to influenza vaccines.

1.18.1 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

IVMP: Influenza vaccine — strain-specific variations to manufacturing processes

Strain-specific variations to manufacturing processes.

Conditions

- Changes can only be made within previously approved parameters.
- The change must not be to a manufacturing process step used as a control measure for adventitious agents.

Data requirements

You must submit:

- Details of the changes.

IVPL: Influenza vaccine — passage or lot number change of approved reassorted virus or approved virus isolate

Change in the passage or lot number of the approved reassorted virus or approved virus isolate.

Conditions

- The new lot should be derived from an approved reassorted virus or virus isolate, using an approved process.

Data requirements

You must submit:

- The lot number and passage history.

IVRR: Influenza vaccine — reference reagent replacement

Replacement of reference reagent.

Conditions

- Changes can only be made to the reference antigen or antiserum.

Data requirements

You must submit:

- The lot number and source of the reference antigen or antiserum.

IVSL: Influenza vaccine — working seed lot change

Change in the working seed lot.

Conditions

- The working seed lot should be derived from an approved reassorted virus or virus isolate, using an approved process.
- Neuraminidase identity should be performed on the first three monovalent pooled harvests from the changed working seed lot, and data should be supplied to the TGA before any lots will be released.

Data requirements

You must submit:

- The lot number and passage history.

1.18.2 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

IVSC: Influenza vaccine changes

Any proposed quality-related changes specific to influenza vaccines can be submitted as part of this Category 3 variation type.

The following types of changes that are specific to influenza vaccines require evaluation of data by the TGA:

- Change in strain for seasonal influenza vaccines — details of the reassorted virus or virus isolate should be provided in the application.
- Change in the approved reassorted virus or virus isolate for influenza vaccines:
 - this refers to a change in the approved reassorted virus or virus isolate of the same strain used to produce the working seed lot. Details of the approved reassorted virus or virus isolate should be provided in the application.
- Any other changes requiring evaluation, such as strain-specific variations to production processes that exceed approved parameters.

Conditions

- Data is submitted as described below.

Data requirements

You must submit

- Description of the proposed change.
- Justification for the proposed change, including changes to test procedures.
- Appropriate validation data.

1.19 Other changes

1.19.1 Correction to, or completion of, an ARTG entry

Sponsors can request corrections to ARTG entries under s. 9D(1) of the [Therapeutic Goods Act 1989](#). Alternatively, the Secretary can make corrections to ARTG entries under s. 9D(1), at his or her initiative. Refer to the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#) for further information.

CADF: Correct an ARTG entry — dosage form

Requires update to ARTG data: Dosage Form.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.

- An assurance that the only changes being made to the ARTG entry are those identified in the request.

CAGN: Correct an ARTG entry — good name

Requires update to ARTG data: Good Name.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

CAIC: Correct an ARTG entry — indications

Requires update to ARTG data: Indications.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

CANC: Correct an ARTG entry — ATC Nordic codes

Requires update to ARTG data: ATC Nordic Codes.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

CAQI: Correct an ARTG entry — quality-related information, includes labels***Conditions***

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

CARA: Correct an ARTG entry — route of administration

Requires update to ARTG data: Route of Administration.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

CASI: Correct an ARTG entry — sterility information

Requires update to ARTG data: Sterility.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

CAVI: Correct an ARTG entry — visual identification / product description

Requires update to ARTG data: Visual Identification.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Details of the correction or additional information.
- Relevant justification and documentary evidence.
- An assurance that the only changes being made to the ARTG entry are those identified in the request.

1.19.2 Self-assessable requests (SARs)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

The conditions outlined below the description of each variation type must be met for the request to be processed as self-assessable.

OMPS: Medicines and poisons — scheduling changes

Requires update to ARTG data: Pack Size & Poison Schedule.

**Changes to medicines and poisons scheduling**

Any changes to the [Standard for the Uniform Scheduling of Medicines and Poisons](#) signal heading and cautionary statements are matters for the states and territories, and therefore should be handled through state and territory authorities.

If a medicine has been rescheduled from Schedule 4 or 8 to Schedule 2 or 3, any necessary changes to the product should be handled according to the [Australian Regulatory Guidelines for Over-the-Counter Medicines](#), where appropriate.

Conditions

- The change in scheduling is from a Schedule 2 or 3 medicine to a Schedule 4 or 8, or from a Schedule 4 to a Schedule 8 medicine.

or

- The medicine has been rescheduled from Schedule 4 or 8 to Schedule 2 or 3, but continues to be regulated as a prescription medicine (see Part 1 of Schedule 10 of the [Therapeutic Goods Regulations 1990](#)).

Data requirements

You must submit:

- Relevant evidence of the change, such as a copy of the final Advisory Committee on Medicines Scheduling decision.
- A copy of the revised label.
- A clean and marked-up copy of the proposed amended PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

SARO: Other self-assessable changes - an application using this type must include written advice from the TGA

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Written advice from the TGA advising the use of this variation type.
- Details of the proposed changes and appropriate supporting data relevant to the change(s) concerned.
- Details of the variation should be described in both the cover letter and in the comments field of the e-form.

1.19.3 Category 3 requests — Data evaluation required under s. 9D(3)

These variations fall under s. 9D(3) of the [Therapeutic Goods Act 1989](#) and require the submission of data for evaluation.

OQRC: Quality-related changes (other) that do not create a separate and distinct good

This can include any quality-related changes that do not create a separate and distinct good. For example, a new supplier or manufacturer of albumin for a blood product.

Conditions

- Data is submitted as described below.

Data requirements

You must submit:

- Appropriate supporting data for the change(s).
- Details of the variation should be described in both the cover letter and in the comments field of the e-form.
- Where the proposed change would involve approval of an amended PI, details of the amended PI, as outlined in the [Variations to prescription medicines — excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).
- If applicable, and if the change is approved, an updated [CPD document](#).

1.20 Associated changes

When requesting a change that will result in a new and distinct good, there may be situations where your variation requires multiple PAR fields to be updated. For example, varying the formulation of your product may result in the need to update the visual identification information.

To prevent the creation of unnecessary separate submissions you can use the 'Associated changes.' These variation types are listed here. They can only be selected in combination with the variation type specified in the conditions. Variations that can be requested as 'Associated

changes' must be described in other parts of this guidance and must not require evaluation of clinical or bioequivalence data. The conditions stated in other parts of the guidance for related variation types would also apply to the associated variation types.

See also:

- Associated changes in the [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

1.20.1 Changes associated with DFCI and DFFC

ZFSM: ARTG data - Manufacturer changes associated with DFCI or DFFC

Change to data within ARTG Manufacturers as a consequence of a change to an inked imprint or to a colouring agent, flavour or fragrance.

Requires update to ARTG data: Manufacturers.

Conditions

- This variation type can only be selected in combination with either:
 - [DFCI: Formulation - addition or deletion of, or variation to, an inked imprint](#)
 - [DFFC: Formulation - change of colouring agent, flavour or fragrance](#).
- This change that is associated with DFCI or DFFC is not a category 3 change requiring the submission of data for evaluation. If this associated change is a category 3 change, select a category 3 formulation variation type first, then an associated change. See [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#) and [PFNA: Formulation changes \(BM\) – New AUST R number](#). Please contact TGA if you would like to use PFCF or PFNA.
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Manufacturers variation types.

ZFSV: ARTG data - Visual identification changes associated with DFCI or DFFC

Change to data within ARTG Visual Identification as a consequence of a change to an inked imprint or to a colouring agent, flavour or fragrance.

Requires update to ARTG data: Visual Identification.

Conditions

- This variation type can only be selected in combination with either:
 - [DFCI: Formulation - addition or deletion of, or variation to, an inked imprint](#)
 - [DFFC: Formulation - change of colouring agent, flavour or fragrance](#).
- This change that is associated with DFCI or DFFC is not a category 3 change requiring the submission of data for evaluation. If this associated change is a category 3 change, select a

category 3 formulation variation type first, then an associated change. See [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#) and [PFNA: Formulation changes \(BM\) – New AUST R number](#). Please contact TGA if you would like to use PFCF or PFNA.

- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Visual Identification variation types. For example, the new product description.

1.20.2 Changes associated with PFCF and DTTR

ZFRC: ARTG data – Container and shelf life changes associated with DFCF/PFCF or DTTR – Retaining AUST R number

Change to data within ARTG Container & Shelf Life associated with a s.23 Category 3 change to formulation or trade name.

Requires update to ARTG data: Container & Shelf Life.

Conditions

- This variation type can only be selected in combination with:
 - [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#)
 - [DTTR: Trade name replacement – Retaining AUST R number](#).
- The change is only to container material or shelf life.
- This change that is associated with PFCF or DTTR is not a change that requires a new AUST R number. If this associated change requires a new AUST R number use [PFNA: Formulation changes \(BM\) – New AUST R number](#) then [changes associated with PFNA and PCCT](#). Please contact TGA if you would like to use PFNA.
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate stability data as described in relevant Container & Shelf Life variation types. Note that the allowable shelf life will be based on what the submitted data supports.

ZFRM: ARTG data – Manufacturer changes associated with DFCF/PFCF or DTTR – Retaining AUST R number

Change to data within ARTG Manufacturers associated with a s.23 Category 3 change to formulation or trade name.

Requires update to ARTG data: Manufacturers.

Conditions

- This variation type can only be selected in combination with:
 - [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#)
 - [DTTR: Trade name replacement – Retaining AUST R number](#).
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Manufacturers variation types.

ZFRN: ARTG data – Good name changes associated with DFCF/PFCF – Retaining AUST R number

Change to data within ARTG Good Name associated with a s.23 Category 3 change to formulation.

Requires update to ARTG data: Good Name.

**The AUST R number can be retained**

Under s. 16(1) of the [Therapeutic Goods Act 1989](#), a change in trade name means that the renamed product is a separate and distinct good from the existing product, and this requires a new ARTG entry. However, the provisions of the [Therapeutic Goods \(Groups\) Order No. 1 of 2001](#) allow the AUST R number of the existing product to be retained for the new product, if the new product replaces the existing product.

Conditions

- This variation type can only be selected in combination with:
 - [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#).
- This change that is associated with PFCF is not a change that would require a new AUST R number. If this associated change requires a new AUST R number use [PFNA: Formulation changes \(BM\) – New AUST R number](#) then [changes associated with PFNA and PCCT](#). Please contact TGA if you would like to use PFNA.
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Good Name variation types.

ZFRO: Other consequential changes to the dossier associated with DFCF/PFCF or DTTR – Retaining AUST R number

Change to data within the dossier associated with a s.23 Category 3 change to formulation or trade name.

Conditions

- This variation type can only be selected in combination with:
 - [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#)
 - [DTTR: Trade name replacement – Retaining AUST R number](#).
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.
- This change does not require update to ARTG data.

Data requirements

You must submit:

- Appropriate data as described in relevant variation types.

ZFRP: ARTG data – Pack size and poison schedule changes associated with DFCF/PFCF or DTTR – Retaining AUST R number

Change to data within ARTG Pack Size & Poison Schedule associated with a s.23 Category 3 change to formulation or trade name.

Requires update to ARTG data: Pack Size & Poison Schedule.

Conditions

- This variation type can only be selected in combination with:
 - [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#)
 - [DTTR: Trade name replacement – Retaining AUST R number](#).
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Pack Size & Poison Schedule variation types.

ZFRS: ARTG data – Sterility changes associated with DFCF/PFCF or DTTR – Retaining AUST R number

Change to data within ARTG Sterility associated with a s.23 Category 3 change to formulation or trade name.

Requires update to ARTG data: Sterility.

Conditions

- This variation type can only be selected in combination with:
 - [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#)
 - [DTTR: Trade name replacement – Retaining AUST R number](#).
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Sterility variation types.

ZFRV: ARTG data – Visual identification changes associated with DFCF/PFCF or DTTR – Retaining AUST R number

Change to data within ARTG Visual Identification associated with a s.23 Category 3 change to formulation or trade name.

Requires update to ARTG data: Visual Identification.

Conditions

- This variation type can only be selected in combination with:
 - [PFCF: Formulation changes \(BM\) – Retaining AUST R number](#)
 - [DTTR: Trade name replacement – Retaining AUST R number](#).
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Visual Identification variation types. For example, the new product description.

1.20.3 Changes associated with PFNA and PCCT**ZFNC: ARTG data – Container and shelf life changes associated with DFNA/PFNA – For the new AUST R number**

Change to data within ARTG Container & Shelf Life associated with a s.23 Category 3 change to formulation.

Requires update to ARTG data: Container & Shelf Life.

Conditions

- This variation type can only be selected in combination with:
 - [PFNA: Formulation changes \(BM\) – New AUST R number](#).

- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate stability data as described in relevant Container & Shelf Life variation types. Note that the allowable shelf life will be based on what the submitted data supports.

ZFNM: ARTG data – Manufacturer changes associated with DFNA/PFNA or PCCT – For the new AUST R number

Change to data within ARTG Manufacturers associated with a s.23 Category 3 change to formulation or container type.

Requires update to ARTG data: Manufacturers.

Conditions

- This variation type can only be selected in combination with:
 - [PFNA: Formulation changes \(BM\) – New AUST R number](#)
 - [PCCT: Packaging — changes to container type – New AUST R number.](#)
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Manufacturers variation types.

ZFNN: ARTG data – Good name changes associated with DFNA/PFNA or PCCT – For the new AUST R number

Change to data within ARTG Good Name associated with a s.23 Category 3 change to formulation or container type.

Requires update to ARTG data: Good Name.

Conditions

- This variation type can only be selected in combination with:
 - [PFNA: Formulation changes \(BM\) – New AUST R number](#)
 - [PCCT: Packaging — changes to container type – New AUST R number.](#)
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Good Name variation types.

ZFNO: Other consequential changes to the dossier associated with DFNA/PFNA or PCCT – For the new AUST R number

Change to data within the dossier associated with a s.23 Category 3 change to formulation or container type.

Conditions

- This variation type can only be selected in combination with:
 - [PFNA: Formulation changes \(BM\) – New AUST R number](#)
 - [PCCT: Packaging — changes to container type – New AUST R number.](#)
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.
- This change does not require update to ARTG data.

Data requirements

You must submit:

- Appropriate data as described in relevant variation types.

ZFNP: ARTG data – Pack size and poison schedule changes associated with DFNA/PFNA or PCCT – For the new AUST R number

Change to data within ARTG Pack Size & Poison Schedule associated with a s.23 Category 3 change to formulation or container type.

Requires update to ARTG data: Pack Size & Poison Schedule.

Conditions

- This variation type can only be selected in combination with:
 - [PFNA: Formulation changes \(BM\) – New AUST R number](#)
 - [PCCT: Packaging — changes to container type – New AUST R number.](#)
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Pack Size & Poison Schedule variation types.

ZFNS: ARTG data – Sterility changes associated with DFNA/PFNA or PCCT – For the new AUST R number

Change to data within ARTG Sterility associated with a s.23 Category 3 change to formulation or container type.

Requires update to ARTG data: Sterility.

Conditions

- This variation type can only be selected in combination with:
 - [PFNA: Formulation changes \(BM\) – New AUST R number](#)
 - [PCCT: Packaging — changes to container type – New AUST R number.](#)
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Sterility variation types.

ZFNV: ARTG data – Visual identification changes associated with DFNA/PFNA or PCCT – For the new AUST R number

Change to data within ARTG Visual Identification associated with a s.23 Category 3 change to formulation or container type.

Requires update to ARTG data: Visual Identification.

Conditions

- This variation type can only be selected in combination with:
 - [PFNA: Formulation changes \(BM\) – New AUST R number](#)
 - [PCCT: Packaging — changes to container type – New AUST R number.](#)
- This change does not require evaluation of clinical or bioequivalence data and is described in other parts of this guidance. The conditions outlined in the relevant variation type are satisfied.

Data requirements

You must submit:

- Appropriate data as described in relevant Visual Identification variation types. For example, the new product description.

2. Product information (PI) changes

The Variation e-form has four category groups which are described in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#):

- Correct an ARTG entry
- Notification
- Quality information
- Product information (PI).

Part 2 of this guidance describes the changes that can be made within the product information category group. This includes changes to the PI that are minor editorial changes and safety related requests.

For changes to the quality aspects of the PI, corrections to the PI and self-assessable requests (SARs) related to PI information see [Part 1: Corrections, notifications and quality information changes](#) and [Product information \(PI\) changes: Quality aspects, corrections and self-assessable requests \(SARs\)](#).

2.1 Product information (PI) changes: Minor editorial changes and safety-related requests (SRRs)



All ARTG entries included in the PI document (and therefore will be affected by a change to the PI) should be selected in the Variation e-form when requesting the variation. If an ARTG entry included in the PI document is not selected, a subsequent variation request will be required to be submitted.

For information about selection of ARTG entries for variations that are consequence of a quality change see consequential changes to the product information in [Variations to prescription medicines – excluding variations requiring evaluation of clinical or bioequivalence data; Process guidance](#).

2.1.1 Minor editorial changes to the product information under s. 9D(3)

This variation falls under s. 9D(3) of the [Therapeutic Goods Act 1989](#).

PIME: PI — make minor editorial changes

Conditions

- The only changes being requested are those identified under this request.

Data requirements

You must submit:

- A clean and marked-up copy of the draft revised PI is provided.
- Details of the safety-related request are provided.
- A justification for the proposed variation is provided.

2.1.2 Safety-related requests (SRRs)

These variations fall under s. 9D(2) of the [Therapeutic Goods Act 1989](#).

Requests are assessed on a case-by-case basis and the proposed variation must meet the criteria of being safety-related. Sponsors should be able to justify how a request meets these criteria. Safety-related variations always require changes to the product information (PI).

PIID: PI — remove an indication with data

Requires update to ARTG data: Indications.

Conditions

- The only changes being requested are those identified under this request.

Data requirements

You must submit:

- A clean and marked-up copy of the draft revised PI.
- Details of the safety-related request.
- A justification for the proposed variation.
- Revised labels, if applicable.

PIIN: PI — remove an indication — no data

Requires update to ARTG data: Indications.

Conditions

- The only changes being requested are those identified under this request.

Data requirements

You must submit:

- A clean and marked-up copy of the draft revised PI.
- Details of the safety-related request.
- A justification for the proposed variation.
- Revised labels, if applicable.

PIOD: PI — make safety related changes with data

Conditions

- The only changes being requested are those identified under this request.

Data requirements

You must submit:

- A clean and marked-up copy of the draft revised PI.
- Details of the safety-related request.
- A justification for the proposed variation.

- Revised labels if applicable.

PION: PI — make safety related changes no data***Conditions***

- The only changes being requested are those identified under this request.

Data requirements

You must submit:

- A clean and marked-up copy of the draft revised PI.
- Details of the safety-related request.
- A justification for the proposed variation.
- Revised labels if applicable.

Version history

Version	Description of change	Author	Effective date
V1.0	Original publication	Scientific Operations Management Section/SEB	June 2017
V2.0	Inclusion of notifiable variations to registered medicines. Minor amendments to phrasing and layout.	Scientific Operations Management Section/SEB	December 2017
V2.1	Minor fixes to typographical errors.	Scientific Operations Management Section/SEB	January 2018
V3.0	Amended title. Additional information on: <ul style="list-style-type: none"> variation types that are associated with a mandatory PAR field update, changes that do not need to be notified to the TGA, new variation types (Associated changes, SARO). Minor clarifications and corrections to phrasing and layout.	Scientific Evaluation Branch (SEB)	July 2019

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