



# QUALITY AND BIOEQUIVALENCE GUIDELINE

This guideline is intended to provide recommendations to applicants wishing to submit new registration applications as well as variations. It represents the Authority’s current thinking on the safety, efficacy and quality of medicines. It is not intended as an exclusive approach. SAHPRA reserves the right to request any additional information to establish the safety, efficacy and quality of a medicine in keeping with the knowledge current at the time of evaluation. Alternative approaches may be used but these should be scientifically and technically justified. The Authority is committed to ensure that all registered medicines will be of the required safety, efficacy and quality. It is important that applicants adhere to the administrative requirements to avoid delays in the processing and evaluation of applications.

Guidelines and application forms are available from the office of the Chief Executive Officer and the website.

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## List of abbreviations

API	Active Pharmaceutical Ingredient
BCS	Biopharmaceuticals Classification System
BTIF	Bioequivalence Trial Information Form
CEP	Certificate of Suitability to the monographs of the European Pharmacopoeia
CoA	Certificate of Analysis
CPQ	Confirmation of WHO API Prequalification
CTD	Common Technical Document
EMA	European Medicines Agency
FPP	Finished Pharmaceutical Product
GCP	Good Clinical Practice
GMP	Good Manufacturing Practice
GRP	Good Regulatory Practice
ICH	International Council for Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use
IPRP	International Pharmaceutical Regulators Programme
LOD	Limit of Detection
ME&R	Medicines Evaluation and Research
MHRA	Medicines and Healthcare products Regulatory Agency (UK)
NCE	New Chemical Entity
P&A	Pharmaceutical and Analytical
PD	Product Dossier
Ph.Eur	European Pharmacopoeia
Post-reg.	Post-registration
PPL	Periplakin (protein coding gene)
PQ	Pre-qualification
Pre-reg.	Pre-registration
PSF	Product Summary File
QIS	Quality Information Summary

QOS	Quality Overall Summary
RSA	Republic of South Africa
SADC	Southern African Development Community
SAHPRA	South African Health Products Regulatory Authority
SCoRE	Summary of Critical Regulatory Elements
SmPC	Summary of Product Characteristics
SOP	Standard Operating Procedure
RRA	Recognised Regulatory Authority
TGA	Therapeutic Goods Administration (Australia)
US FDA	United States of America Food and Drug Administration
USP	United States Pharmacopoeia
WHO	World Health Organisation

## 1 Policy

The South African Health Products Regulatory Authority (SAHPRA) has decided to harmonise certain SAHPRA medicine policies and procedures with those of the European Medicines Agency (EMA). These in turn are aligned to the framework of the International Council for Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH). By doing so, SAHPRA will reflect global best practice in terms of the safety, quality and efficacy of health product regulation.

SAHPRA is adopting the EMA guidelines for quality and bioequivalence requirements and endorses the principles contained therein. The EMA guidelines adopted in Section 3 below should be read in conjunction with currently applicable SAHPRA guidelines stipulated in Section 2 below. However, unless otherwise stated, the EMA guidelines take precedence over existing SAHPRA guidelines. Where other guidelines (i.e. not EMA or SAHPRA) are specifically applicable, references have been made thereto.

Please note: Unless mentioned otherwise, where EMA guidelines adopted in South Africa include references to European Union (EU) legislation, the requirements contained in the referenced EU legislation are not applicable to the evaluation of medicines by SAHPRA. South African legislation will apply wherever relevant and current.

## 2 Applicable SAHPRA guidelines to be read in conjunction with new guidelines

The SAHPRA guidelines listed below are to be read in conjunction with the newly adopted guidelines for quality and bioequivalence requirements. The latest published (i.e. non-draft) version should always be referred to.

- International Metric System (SI) Guideline (2.38)
- General Information Guideline (2.01)
- Module 1 Guideline (2.24)
- Stability Guideline (2.05)

*Please see Section 6.1 for direction on alignment between EMA, SAHPRA and SADC stability guidelines*

- Dissolution Guideline (2.07)

### 3 Newly adopted guidelines

The below list of newly adopted guidelines should be referred to for quality and bioequivalence requirements for new registrations and variations to currently registered products.

Current versions are linked below; however, these are subject to updates and the latest published non-draft version should always be referred to.

At its discretion, SAHPRA may recognise guidance from the WHO, US FDA and other regulatory authorities with which SAHPRA aligns itself. However, applicants are advised to prepare submissions in line with the new guidelines, read in conjunction with applicable SAHPRA guidelines listed in Section 2.

Newly adopted guidelines:

- [EMA quality guidelines](#)

*Quality guidelines are provided for:*

- [Active substance](#)
- [Manufacturing](#)
- [Impurities](#)
- [Specifications, analytical procedures and analytical validation](#)
- [Excipient labelling](#)
- [Packaging](#)
- [Stability](#)
- [Pharmaceutical development](#)
- [Quality by Design](#)
- [Specific types of products](#)
- [Lifecycle management](#)

Please note that a typed version of specifications and standard test procedure will only be accepted if version controlled, dated and signed.

Additional Questions and answer information:

- [EMA bioequivalence guideline](#)

- [Bioanalytical method validation, presentation of biopharmaceutical and bioanalytical data, and pharmacokinetic and clinical evaluation of modified release dosage forms](#)
- [Comment on bioequivalence for fixed combination products](#)
- [Questions and answers – Clinical pharmacology and pharmacokinetics](#)
- [Questions and answers – Pharmacokinetics Working Party](#)
- [Biowaiver template for additional strength\(s\)](#)
- [Biowaiver template for BCS](#)
- [EMA excipient labelling guideline](#)

## 4 Variations

SAHPRA will adopt the [EU variation classification guidelines](#) for orthodox human and veterinary medicines<sup>1</sup> in full. Please see SAHPRA's Variations Addendum for Orthodox Medicines for more information about the application of the EU variation classification.

## 5 Review pathways

### 5.1 Introduction to reliance-based evaluation

An ME&R evaluation will follow one of the following review pathways:

- a) Full review
- b) Abridged review
- c) Verified review
- d) Recognition

Review pathways (b), (c) and (d) represent reliance-based evaluations. The World Health Organisation defines reliance (link [here](#), page 15) as “[t]he act whereby the regulatory authority in one jurisdiction may take into account and give significant weight to – i.e. totally or partially rely upon – evaluations performed by another regulatory authority or trusted institution in reaching its own decision. The relying authority remains responsible and accountable for decisions taken, even when it relies on the decisions and information of others.”

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1. Any guidance regarding complementary and biological medicines, as well as medical devices, referenced in the EU variations guidelines is not applicable to SAHPRA – existing guidelines will apply.

## 5.2 SAHPRA's recognised regulatory authorities

To qualify for a reliance evaluation pathway, a product being applied for must be registered by one or more of the recognised regulatory authorities (RRAs) with which SAHPRA aligns itself. SAHPRA will leverage evaluation efforts done by RRAs in order to make its evaluation process more efficient and enhance market access. SAHPRA's current RRAs include:

- European Medicines Agency Centralised Procedure (EMA CP)
- European Medicines Agency Decentralised Procedure (EMA DCP) (no restrictions on which member state acts as the reference member state)
- Health Canada
- Medicines and Health Products Regulatory Agency, UK (MHRA)
- Ministry of Health, Labour and Welfare (MHLW), Japan
- Swiss Agency for Therapeutic Products (Swissmedic)
- Therapeutic Goods Administration, Australia (TGA)
- US Food and Drug Administration (US FDA)

Two additional procedures can be used for reliance / collaborative review, which are not strictly regulatory authorities:

- World Health Organisation Prequalification (WHO PQ)
- Zazibona collaborative procedure

## 5.3 Principles of reliance-based evaluation

Reliance-based evaluation will be based on the following principles:

- Reliance is applicable for both new registration and variation applications (Type IB and Type II).
- Reliance for Clinical and ME&R is applied independently, i.e. the review types selected by the units could differ based on unit-specific document requirements and the availability thereof.
- The application submitted for registration by SAHPRA should be the same as the most updated product on record at the RRA, i.e. all **approved** variations for the RRA's registered product should be incorporated in the application submitted for registration by SAHPRA. Pending variations with the RRA should **not** be included in the application submitted to SAHPRA in order for the application to qualify for reliance.
- All decisions regarding final evaluation pathway (i.e. full review or reliance-based review) as well as the extent of reliance on the RRA's evaluation of the product being applied for are at

the discretion of SAHPRA, based on the documents (and quality thereof) available for reliance-based evaluation.

- Any and all decisions regarding approval and final registration will be made by SAHPRA, in consideration of multiple factors including an RRA registration.

## 5.4 Definitions of review pathways

### 5.4.1 Full review

A full review involves a thorough review of all aspects of the dossier, including:

- Module 1: Regional administrative data (as required)
- Module 2: Relevant summaries
- Module 3: Quality data
- Module 5: Efficacy data (for generic medicines)

All applications for products / variations that have not been registered / approved by an RRA, or that lack sufficient reliance documentation, will be considered for a full review. To reiterate, both new registrations and Type IB and Type II variations, for NCEs and generics, which meet these criteria will be considered for a full review.

### 5.4.2 Abridged review

An abridged review is a reliance-based review comprising:

- Validation by SAHPRA to ensure that the product application submitted for registration by SAHPRA is the same as the product registered by the specified RRA
- Evaluation of Module 1: Regional administrative information (as required)
- Evaluation of specific aspects of the dossier, depending on the type of application submitted

The abridged review process does **not** involve an abbreviated application – all data and information required for a full review should be submitted, i.e. the full CTD module structure, as well as the SCoRE document. Evaluators may still wish to review data in the dossier as required.

An abridged review is applicable to the following types of applications:

- i. For a new registration application for a generic medicine already registered by an RRA
- ii. For a new registration for a WHO PQ product:
  - Applicants are required to follow SAHPRA's process for the WHO Collaborative Registration Procedure

- iii. Backlog-specific: For a new registration application for a generic or NCE medicine that has received prior P&A Committee approval, where any information relevant to P&A Committee approval has been updated since approval
- iv. For a Type II variation where the variation applied for has already been approved by an RRA

#### 5.4.3 Verified review

A verified review is a reliance-based review comprising:

- Validation by SAHPRA to ensure that the product application submitted for registration by SAHPRA is the same as the product registered by the specified RRA
- Evaluation of Module 1: Regional administrative information (as required)

The verified review process does **not** involve an abbreviated application – all data and information required for a full review should be submitted, i.e. the full CTD module structure, as well as the SCoRE document. Evaluators may still wish to review data in the dossier as required.

A verified review is applicable to the following types of applications:

- i. For a new registration application for an NCE medicine already registered by an RRA
- ii. Backlog-specific: For a new registration application for a generic or NCE medicine that has received prior P&A Committee approval, where Module 1, 2 or 3 has **not** been updated since approval (i.e. the information relevant to the prior P&A Committee approval has **not** changed)
- iii. For a Type IB variation where the variation applied for has already been approved by an RRA

#### 5.4.4 Recognition

SAHPRA is currently in the process of negotiating recognition agreements with RRAs. Once such an agreement is in place, SAHPRA will publish a framework for the practical implementation thereof. The guiding principle is that applications approved by RRAs with which SAHPRA shares a recognition agreement may not need to be evaluated separately by SAHPRA. Please note that this is not to be confused with collaborative / work-sharing procedures, e.g. Zazibona.

## 5.5 Documentation required for reliance-based evaluation

To qualify for a reliance-based review, an applicant needs to submit additional documentation to the documentation required for a full review.

Table 1: Documentation required for reliance-based evaluation

Document required	Applicable types of applications
<ul style="list-style-type: none"> <li>Completed abridged review template</li> </ul>	5.4.2 i, ii
<ul style="list-style-type: none"> <li>Completed verified review template</li> </ul>	5.4.3 i
<ul style="list-style-type: none"> <li>Full, unredacted assessment / evaluation reports from the RRA where the product is registered, <b>or</b></li> <li>If the applicant cannot obtain full, unredacted assessment / evaluation reports from the RRA where the product is registered, the Letter of access (Appendix in the General Information Guideline – 2.01) must be completed, and</li> <li>Details of the outcomes of the application in all jurisdictions where it has been submitted, and</li> <li>Foreign registration certificate(s), and</li> <li>SmPC, a copy of the patient information leaflet (PIL) and label of the product that has been registered by the RRA, and</li> <li><u>If available</u>: initial scientific assessments, regulatory correspondence with the sponsor / applicant, follow-up assessments, and any other documentation from the RRA related to the final registration decision, and</li> <li><u>If available and where applicable</u>: risk management plans and on-site inspection reports (or equivalent), for example GCP / GRP. Does not include the data package filed with the RRA</li> </ul>	5.4.2 i, iv 5.4.3 i, iii
<ul style="list-style-type: none"> <li>Letter of approval from the RRA</li> </ul>	5.4.2 iv 5.4.3 iii
<ul style="list-style-type: none"> <li>Declaration: Sameness (Appendix 2)</li> </ul>	5.4.2 i, ii 5.4.3 i
<ul style="list-style-type: none"> <li>Declaration: Previous P&amp;A Committee approval (Appendix 3)</li> </ul>	5.4.2 iii 5.4.3 ii

Additional documentation requirements for the various types of applications may be stipulated in other sections of this guideline or other guidelines.

Additional documentation requirements for WHO PQ products are detailed in SAHPRA's process for the WHO Collaborative Registration Procedure.

Additional documentation requirements for reliance-based review of variations applications are detailed in SAHPRA's Variations Addendum for Orthodox Medicines.

#### 5.5.1 Full, unredacted assessment / evaluation reports

- Please note that if the full, unredacted assessment / evaluation reports from the RRA where the product is registered are in a language which is not English, certified translated versions need to be provided as per SAHPRA guidelines.
- Please note that full, unredacted assessment / evaluation reports from the RRA where the product is registered should at least include safety, efficacy and quality report(s) prepared by the RRA upon which the registration decision for the health product was based.
- If full, unredacted assessment / evaluation reports from the RRA are not provided by the applicant, SAHPRA may contact the RRA to obtain them, provided the Letter of access (Appendix in the General Information Guideline) has been provided. However, SAHPRA does not take responsibility for guaranteeing the obtainment of these reports. If the reports are not obtained, the application in question will most likely default to a full review, extending evaluation time.

## 6 South Africa Specific Requirements

The following guidelines contain information pertaining to the regional requirements specific to South Africa for quality and bioequivalence. Refer to the General Information Guideline and Module 1 Guideline for additional South Africa specific requirements.

### 6.1 Module 3.2.P: Drug product

#### 6.1.1 3.2.P.8 Stability

SAHPRA's Stability Guideline remains applicable. However, in keeping with regional and international best practice, applicants can refer to guidance on Module 3.2.P.8 from:

- EMA
- South African Development Community (SADC)

Applicants can choose to follow the requirements of SAHPRA, SADC or EMA's Stability Guideline, as long as this is clearly stated in the Stability Protocol. This does not apply to products applied for through reliance on the Zazibona collaborative process for evaluation. In this case, the SADC Stability Guideline must be adhered to.

Regarding the requirement for stability data for generics, the current SAHPRA stability guideline requires a minimum of 6 months' long-term and 3 months' accelerated stability data for a generic application. However, SAHPRA would prefer that 12 months' long term (and 6 months' accelerated) stability data is included in the new registration application to facilitate longer retest periods.

SAHPRA will, in time, harmonise its Stability Guideline to ensure clarity on what specific requirements should be followed. Until further communication the above approach is acceptable.

## 6.2 Module 3.2.R: Regional information

### 6.2.1 3.2.R.1 Pharmaceutical and Biological availability

#### SCOPE

This module addresses the pharmaceutical and biological availability for generic applications and NCE line extensions with special reference to the purpose of the study(ies), the reference product(s) and the overall conclusion.

- i) Partial exemption from the requirements of 3.2.R.1 and 5.3.1 may be applicable if efficacy and safety are intended to be established by clinical data (or for other reasons as determined by the SAHPRA), provided that clinical trials have been conducted with the same formulation as the one being applied for, in which case:
  - The pharmaceutical availability profile(s) of the API(s) in the final formulation being applied for, for which exemption or partial exemption is justified, should specifically be demonstrated, e.g. the dissolution profiles for solid oral, oral suspension and parenteral suspension products should be included in accordance with the Dissolution guideline, and/or other relevant data provided to unequivocally characterise the formulation used in the clinical trials.
- ii) If clinical evidence in support of efficacy is not submitted, or if the final formulation being applied for is not the same as that used in clinical trials, studies and data to demonstrate the pharmaceutical and/or biological availability / equivalence of the product should be included.
- iii) If in the opinion of the applicant no data are required to substantiate efficacy (e.g. parenteral solutions), clearly state the rationale for accepting safety and efficacy and include a discussion on the excipients (refer to EMA guideline on the investigation of bioequivalence), and a comparison of final product characteristics in 3.2.R.1.4.2.
- iv) One of the following methods depending on the relevancy may be used
  - Bioavailability
  - Dissolution
  - Disintegration
  - Acid neutralising capacity
  - Microbial growth inhibition zones
  - Proof of release by membrane diffusion
  - Particle size distribution

- Blanching test
- [EU guidance on locally applied locally acting products](#)
- [EU guidance on locally acting products in the gut](#)
- Any other method provided the rationale for submitting the particular method is included. The above methods are subject to change based on finalisation of EMA guidelines addressing specific routes of administration.

v) Data submitted should always be comparative, except as stated above under i), when product characterisation is submitted.

**a) Bioequivalence and/or biowaivers**

Refer to the EU Bioequivalence guideline, SAHPRA dissolution guideline and [EMA reflection paper on the dissolution specification for generic oral immediate release products](#)

For new registration generic applications, SAHPRA requires the completion of a Bioequivalence Trial Information Form (BTIF), designed to provide a summary of a bioequivalence study submitted as part of a product dossier. The completed BTIF will be used by the evaluator to facilitate more rapid and effective evaluation of the bioequivalence study. If applicable, please include a completed BTIF in MS Word format in the working documents folder.

**b) In vitro dissolution**

The studies should be carried out in accordance with the SAHPRA Dissolution guideline and the EMA reflection paper specified above. However, the stringent EMA criteria with respect to time points after > 85% dissolution is achieved (i.e. required for both test and reference products) do not need to be adhered to.

**c) Disintegration**

Disintegration as proof of efficacy may be used in the following instances:

- Vitamins or vitamins and mineral combinations when a claim is made as a supplement.
- Sucralfate.

The disintegration test included for Nutritional Supplements in the USP, or in the Ph Eur should be used for the vitamins.

The general disintegration test included in the USP/Ph Eur may be used for the other substances.

**d) Acid neutralising capacity**

Acid neutralising capacity may be used as proof of efficacy for products with an antacid or acid neutralising claim. The acid neutralising capacity test included in the USP should be used.

**e) Microbial growth inhibition zones**

Microbial growth inhibition zones may be used as proof of efficacy for simple solution topical formulations with a bacteriostatic/bacteriocidal/antiseptic claim.

**f) Proof of release by membrane diffusion**

Proof of release by membrane diffusion will not be accepted as proof of efficacy alone, unless data are presented that show a correlation between release through a membrane and clinical efficacy.

Additional information can be found at the link below:

[Quality and equivalence of topical products](#)

**g) Particle size distribution**

Particle size distribution may be used in support of proof of efficacy for inhalations. The Anderson sampler or equivalent apparatus should be used. In addition appropriate information should be submitted to provide evidence of clinical safety and efficacy.

Additional information can be found at the link below:

[Pharmaceutical quality of inhalation and nasal products](#)

[Requirements for clinical documentation for orally inhaled products \[...\]](#)

**h) Blanching test**

The blanching test may be used as proof of efficacy for topical dosage forms containing topical corticosteroids.

Additional information can be found at the link below:

[Quality and equivalence of topical products](#)

The rationale for any other particular method should be provided.

## STUDY PRODUCTS

A sufficient number of retention samples of both test and reference products used in the bioequivalence or other studies, should be kept for one year in excess of the accepted shelf-life, or two years after completion of the trial or until approval, whichever is longer, in order to allow re-testing if so required by SAHPRA. A complete audit trail of procurement, storage, transport and use of both the test and reference products should be recorded.

**(1) Batch Size**

The batch used in the bioequivalence or other studies should satisfy the following requirements:

- i) The batch size should be a minimum of 100 000 units or at least 10% of the production batch, whichever is greater. If the batch size is less than 100 000 units, the use of a smaller batch size should be motivated/justified.
- ii) If the production batch size is smaller than 100 000 units, a full production batch should be used.
- iii) A high level of assurance should be provided that the product and process used in the production of the product will be feasible on an industrial scale. If the product is subjected to further scale-up, this should be validated appropriately.

**(2) Reference Products (comparators) (see also [EMA bioequivalence guideline](#))**

**N.B. Products containing chemical entities/active moieties that are not registered in South Africa cannot be used as reference products in efficacy and safety studies submitted in support of an application.**

Copies of the labelling (label(s) and patient information leaflet / professional information) for the reference as well as the innovator product marketed in South Africa should be provided in 3.2.R.1.2 except as under point a)(iii) below, in which case a SAHPRA approved patient information leaflet / professional information for a generic or similar product should be submitted if available.

If a different chemical form is used, it must be confirmed that the safety / efficacy profile is not altered (3.2.R.1.1.11). The confirmation may be documented / with bibliographical evidence. If well known (e.g. hydrochloride, maleate, nitrate, stearate), reference to a pharmacopoeia accepted by SAHPRA may be acceptable.

Product strengths not available in South Africa may be applied for and/or used in biostudies provided that the dose range is approved/registered in South Africa.

**i) Selection of Reference Product**

The reference product should be an innovator product registered by SAHPRA and should be preferably procured in South Africa. An exception is an "OLD MEDICINE" that may be used as a reference product when no other such product has been registered provided that it is available on the South African market. If more than one such product is available the market leader should be used as the reference (e.g. IMS database). Applicant has to submit evidence to substantiate market leadership claim.

The following options for selection of the reference product are listed in order of preference:

- i) the innovator product registered and procured in South Africa; or
- ii) the innovator product, registered in South Africa, for which a marketing authorisation has been granted by the health authority of a country with which SAHPRA aligns itself (see General Information guideline 3.1.4), and which is to be purchased from that market; or
- iii) a product from the latest edition of the [WHO International comparator products for equivalent assessment of interchangeable multisource \(generic\) products QAS/05.143](#). The primary manufacturing site is indicated in the WHO comparator list, and the comparator is to be purchased in that country, or;
- iv) in the case that no innovator product can be identified – within the context of (i)–(iii) above, the choice of the reference must be made carefully and must be comprehensively justified by the applicant.

**j) Reference Products for Combination Products (see [EMA bioequivalence guideline](#))**

Combination products should, in general, in accordance with a) above, be assessed with respect to bioavailability and bioequivalence of individual active substances:

- Either single entity products administered concurrently (in the case of clinically justifiable combinations), or
- Using an existing combination as the reference, which should be an innovator product registered by SAHPRA on safety and efficacy data.

In the former instance, immediate release oral dosage forms containing a single API may be used as the reference. These reference products may include “OLD MEDICINES”.

### **3.2.R.1.1 Overview**

#### **3.2.R.1.1.1 Country where developed, company developed by, test product synonyms.**

Give a brief introductory description of the development of the test product, the innovator and test product synonyms

#### **3.2.R.1.1.2 The type of study(ies) submitted as proof of efficacy, i.e. bioequivalence, dissolution, comparative dissolution or other study(ies). Give a brief description of the rationale for the different studies.**

#### **3.2.R.1.1.3 The purpose of the study or studies (more than one may be applicable)**

- 1) comparison of the formulation to be marketed versus the formulation used in clinical trials, or
- 2) proof of efficacy for a multisource (generic) new dosage form/new strength medicine application, or
- 3) proof of efficacy of new formulation (formulation change); or

- 4) proof of efficacy of products manufactured by new manufacturer (manufacturer different to that of the test product - or previously approved/registered - when relevant as per the Amendments guideline); or
- 5) biowaiver in accordance with:
  - Similarity (for additional strengths)
  - Biopharmaceutical Classification System (BCS)
- 6) characterisation of the clinical trial(s) test product being applied for.

3.2.R.1.1.4 The status of the reference product

- Clinical trial formulation
- Innovator product
- Current formulation (for change of formulation)

3.2.R.1.1.5 A description of the type of study(ies), bioequivalence, dissolution, comparative dissolution or other study(ies)

3.2.R.1.1.6 Confirmation that the data submitted have been obtained with the formulation and manufacturing process being applied for.

If the formulation and or manufacturing process being applied for is different to that of the test product the relevant requirements in accordance with the Variations guideline should be complied, and the relevant dissolution, stability and validation data included in 3.2.R.1.4, 3.2.P.8 and 3.2.P.3.5 respectively.

Please note: If the product being applied for is not identical to the test product used in the biostudy (i.e. if changes have been made to the product), the applicant is required to submit data to confirm essential similarity between the product being applied for and the test product used in the bioequivalence study. The data should include, but not be limited to, the following:

- Unit formulation, manufacturing procedure and equipment
- Site of manufacture and source of the API
- Overall product specifications and any changes with respect to analytical methods

If the reference product is expired or is not available, a batch of the reference product procured from the same country and manufacturer as the biostudy reference product should be used for dissolution testing. Please note that redoing the biostudy is not required.

- 3.2.R.1.1.7 Confirmation that the test product (all strengths) was manufactured by the same manufacturer and site applied for.

If the manufacturer or site being applied for is different to that of the test product the relevant requirements in accordance with the Variations guideline should be complied, and the dissolution, stability and validation data included in 3.2.R.1.4, 3.2.P.8 and 3.2.P.3.5 respectively.

- 3.2.R.1.1.8 Confirmation that the test product was manufactured with API(s) manufactured by the same API manufacturer as being applied for.

Proof of physico-chemical equivalence is required if the manufacturer of the API is additional or different to that stated in 3.2.S and must be included in 3.2.R.4. The relevant requirements in accordance with the Variations guideline should also be complied with and the dissolution, stability and validation data included in 3.2.R.1.4, 3.2.P.8 and 3.2.P.3.5 respectively.

- 3.2.R.1.1.9 A statement whether *in vivo-in vitro* correlation from the data was obtained by the method(s) used, if applicable.

*In vivo-in vitro* correlation data should be included in 5.3.1.3

- 3.2.R.1.1.10 Motivation for the use of the particular reference product [*Refer to Selection of Reference Products 2a above*] The choice of reference product should be justified by the applicant. **Reference products registered in South Africa but procured in another country, the health regulatory authority of which SAHPRA aligns itself with (“foreign” reference product).**

The following additional information should be supplied when the Biostudy reference product used is registered but not procured in South Africa:

- 1) The name and address of the manufacturing site where the reference product is manufactured.
- 2) The qualitative formulation of the reference product.
- 3) Copies of the immediate container label as well as the carton or outer container label of the reference product.
- 4) For modified release, evidence of the mechanism of modified release of the reference product.
- 5) The method of manufacture of the reference product if claimed by the applicant to be the same.
- 6) Procurement information of the reference product
  - Copy of licensing agreement/s if relevant
  - Distribution arrangements / agreement/s if relevant

- Copy of purchase invoice (to reflect date and place of purchase) 3.2.R.1.2

3.2.R.1.1.11 Motivation for the use of a pharmaceutical alternative or lower strength

3.2.R.1.1.12 Tabular summary of the information pertaining to the study products.

To facilitate evaluation a tabular summary (example on the next page) of the following information pertaining to the study products, is required.

- 1) Full details of the reference product(s) used as the standard for reference purposes (including e.g. the applicant, proprietary name, lot number, expiry date).
- 2) If the reference product is registered but not procured in South Africa, the labelling / SmPC / patient information leaflet of the reference product translated into English if not in English, as well as the professional information / patient information leaflet of the relevant innovator product in South Africa.
- 3) Full details of the test product (including e.g. the applicant, proprietary name, lot number, expiry date).
- 4) Assay of test and reference products. The assay of the test and reference products should not differ by more than 5 % in assay unless justified.
- 5) Dissolution profiles of test and reference products (EU guideline on the investigation of bioequivalence).
- 6) Certificates of Analysis for the test and reference products analysed using the control procedures for description, assay, impurities, content uniformity and dissolution proposed in the submission for the test product. Include in 3.2.R.1.3.
- 7) A CoA of the API used in the test product study-batch.
- 8) The size of the study/test product batch.

#### **Tabular summary of study products**

- *Example, may be adapted as appropriate to include the innovator product in South Africa or other information*
- *e.g. if the biostudy reference product is not the innovator registered and on the market in South Africa an extra column for the details of the innovator product in South Africa corresponding to that of the biostudy reference product is appropriate. Extra rows may be included as required to reflect e.g. more detailed dissolution results or similarity factor values, or page numbers of documents.*

Product Information	Reference Product(s) of Biostudies	Corresponding RSA Reference product	Test product Formulation Applied For
Name			
<b>Biostudy</b>			
Batch no and expiry date			
HCR/PHCR			
Country where purchased/ manufactured			***
Manufacturing site			
Assay results*			
Impurities			
Dissolution results			
<b>Comparative dissolution</b>			
Batch no and expiry date			
Assay results %			
Comp. dissolution results			
Similarity $f_2$			
Source of API	<i>if known/relevant</i>	<i>if known/relevant</i>	**
Batch size	<i>if known/relevant</i>	<i>if known/relevant</i>	
Product status	Clinical trial formulation or Innovator product or Current formulation (for change of formulation) as <i>the case may be</i>	Clinical trial formulation or Innovator product or Current formulation (for change of formulation) as <i>the case may be</i>	
CoAs, test and reference products and API of test product study batch	3.2.R.1.3 p	3.2.R.1.3 p	3.2.R.1.3 p
Patient information leaflet /professional information / SmPC	3.2.R.1.2 p	3.2.R.1.2 p	Module 1.3

Product Information	Reference Product(s) of Biostudies	Corresponding RSA Reference product	Test product Formulation Applied For
Label	3.2.R.1.2 p		Module 1.3
<p>* Justification if the difference between test and reference is more than 5 %</p> <p>** Proof of physical/chemical equivalence is required if the manufacturer is different to that in 3.2.S</p> <p>*** Motivation and supporting data are required if the manufacturer and/or the site applied for is different to the manufacturer and/or site of the test product</p>			

3.2.R.1.1.13 The formulation of each of the dosage strengths of the test product(s) in tabular form in the case of an application for a biowaiver of proportionally similar dosage strengths.

3.2.R.1.1.14 A discussion and conclusion of the outcomes of each of the studies and other relevant information to support and justify acceptance of product efficacy.

3.2.R.1.1.15 An overall conclusion

It is important to include, in addition to the individual study conclusions, an overall conclusion of all the data submitted to support and justify product efficacy and where relevant, safety.

3.2.R.1.1.16 References

### 3.2.R.1.2 Reference product/s (local and foreign)(identification/documentation)

- 1) Package inserts
- 2) Label and carton,
- 3) Qualitative formulation,
- 4) Proof of procurement / invoice (foreign product)

### 3.2.R.1.3 Certificates of Analysis

- 1) Biostudy reference product
- 2) RSA corresponding innovator
- 3) Biostudy test product and any other strength
- 4) API of the test product
- 5) Before and after formulation/manufacturer/API changes

### 3.2.R.1.4 Pharmaceutical availability studies

Please refer to Appendix 1 for relevant guidance on in vitro studies – dissolution profile comparison

## 3.2.R.1.4.1 Dissolution studies, data and reports

- 1) Dissolution profiles of the test and reference products
- 2) Comparative dissolution between foreign reference product and RSA registered innovator product (if applicable)
- 3) Comparative dissolution between different strengths of the test product (biowaiver of additional strengths)
- 4) Comparative dissolution between test and reference products (BCS biowaiver)
- 5) Comparative dissolution data in support of:
  - additional or different API manufacturer (for low solubility APIs or when particle size or polymorphic form is critical to the bioavailability of the product)
  - additional or different FPP manufacturer and/or site
  - different formulation

being applied for to that of the test product.

## 3.2.R.1.4.2 1) Other

- 2) Motivation for exemption of data to substantiate efficacy.

If in the opinion of the applicant no data are required to substantiate efficacy (e.g. parenteral solutions) the rationale for accepting safety and efficacy should be clearly stated and include a discussion on the excipients (refer to Biostudies guideline), and comparison of final product characteristics.

## 6.2.2 3.2.R.2 Parent API manufacturer / DMF Holder with various sites

- 1) If an identical route of synthesis, or manufacturing process of the PPL (in case of Biological Medicines), including the purification step is used by each site of the same parent company or DMF Holder, a statement to this effect will suffice with regard to the route.
- 2) In this case include valid CoAs from the API manufacturer or manufacturer of the primary production lot (in case of Biological Medicines) for two batches issued by each site.

## 6.2.3 3.2.R.3 Certificate(s) of suitability with respect the Ph.Eur. (CEPs) Confirmation of WHO API Prequalification (CPQ)

**Option 1: Certificate of Suitability of the European Pharmacopoeia (CEP)**

A complete copy of the CEP (including any annexes) should be provided in this section. The CEP holder on behalf of the FPP manufacturer or applicant who refers to the CEP should duly fill out the declaration of access for the CEP to applicant/FPP manufacturer.

In addition, a written commitment should be included that the applicant will inform SAHPRA in the event of changes, or if the CEP is withdrawn. It should also be acknowledged by the applicant that withdrawal of the CEP would require additional consideration of the API data requirements (full Module 3.2.S) to support the product dossier. The written commitment should accompany the copy of the CEP.

Along with the CEP, the applicant should supply the following information in the dossier, with data summarized in the QOS.

- 3.2.S.1.3 General properties - discussions on any additional applicable physicochemical and other relevant API properties that are not controlled by the CEP and Ph.Eur. monograph, e.g. solubilities and polymorphs as per guidance in this section.
- 3.2.S.3.1 Elucidation of structure and other characteristics - studies to identify polymorphs (exception: where the CEP specifies a polymorphic form) and particle size distribution, where applicable, as per guidance in this section.
- 3.2.S.4.1 Specification - the specifications of the FPP manufacturer including all tests and limits of the CEP and Ph.Eur. monograph and any additional tests and acceptance criteria that are not controlled in the CEP and Ph.Eur. monograph, such as polymorphs and/or particle size distribution.
- 3.2.S.4.2 / 3.2.S.4.3 Analytical procedures and validation – for any methods used by the FPP manufacturer in addition to those in the CEP and Ph.Eur. monograph.
- 3.2.S.4.4 Batch analysis - results from two batches of at least pilot scale, demonstrating compliance with the FPP manufacturer's API specifications.
- 3.2.S.5 Reference standards or materials – information on the FPP manufacturer's reference standards.
- 3.2.S.6 Container closure system - specifications including descriptions and identification of primary packaging components. Exception: where the CEP specifies a container closure system and the applicant / FPP manufacturer declares to use the same container closure system.
- 3.2.S.7 Stability - exception: where the CEP specifies a re-test period that is the same as or of longer duration, and storage conditions which are the same or higher temperature and humidity as proposed by the applicant.

In the case of sterile APIs, data on the sterilisation process of the API, including validation data, should be included in the dossier.

**Option 2: Confirmation of API Prequalification document (CPQ).**

A complete copy of the WHO Confirmation of API Prequalification document should be provided in this section, together with the duly filled out authorisation box in the name of the FPP manufacturer or applicant.

The applicant should supply the following information in the dossier, with data summarised in the QOS

- 3.2.S.1.3 General properties - discussions on any additional applicable physicochemical and other relevant API properties that are not controlled by the API manufacturer's specifications e.g. solubilities and polymorphs as per guidance in this section.
- 3.2.S.2 In the case of sterile APIs, data on the sterilisation process of the API, including validation data, should be included in the dossier, unless it is stated on the CPQ that the API is sterile.
- 3.2.S.3.1 Elucidation of structure and other characteristics - studies to identify polymorphs and particle size distribution, where applicable, as per guidance in this section.
- 3.2.S.4.1 Specification - the specifications of the FPP manufacturer including all tests and limits of the API manufacturer's specifications and any additional tests and acceptance criteria that are not controlled by the API manufacturer's specifications such as polymorphs and/or particle size distribution.
- 3.2.S.4.2 / 3.2.S.4.3 Analytical procedures and validation – for any methods used by the FPP manufacturer in addition to those in the API manufacturer's specifications.
- 3.2.S.4.4 Batch analysis - results from two batches of at least pilot scale, demonstrating compliance with the FPP manufacturer's API specifications.
- 3.2.S.5 Reference standards or materials – information on the FPP manufacturer's reference standards.
- 3.2.S.7 Stability - data to support the retest period if either the proposed retest period is longer or the proposed storage conditions are at a lower temperature or humidity to that of the Prequalified API.

**6.2.4 3.2.R.4 Multiple API manufacturers**

If more than one manufacturer of the API is being applied for (irrespective of the apparent similarity of the routes utilised by the different manufacturers), or when different routes of synthesis are used in the manufacture of the API, the following should be submitted, in addition to Module 3.2.S for each API:

**3.2.R.4.1 Comparison of the APIs**

- A report (desktop comparison) pointing out the differences in the routes used, where applicable, and the differences with regard to the impurity profiles and residual solvents unless justified. The specifications for the API should make provision for these impurities and residual solvents.

3.2.R.4.2 Batch analysis data (in a comparative tabular format) for at least two batches (minimum pilot scale) of the active substance from the current and proposed manufacturers/sites.

3.2.R.4.3 Confirmation of compliance with guidelines

- Confirmation of compliance with the variation guideline, stating type and category, and identification of the location of the relevant data in the dossier is required. Confirmation of compliance with the Stability guideline (1.2.3 a) and identification of the relevant data in the dossier is required.

3.2.R.4.4 Certificates of analysis

- Provide certificates of analysis for each batch of API reported on in 3.2.R.4.2

6.2.5 3.2.R.5 Medical devices

Validation / calibration / specifications of medical device(s)

6.2.6 3.2.R.6 Materials of animal / human origin

All ingredients of animal origin (excluding products from porcine origin) should be BSE/TSE free. Include a declaration from FPP manufacturer that the materials used will always comply with BSE/TSE free requirements.

6.2.7 3.2.R.7 Production documentation

Copy of the batch manufacturing record including the ingredient (API and excipients) analytical reports, in process control tests reports, intermediate product test reports, reconciliation records and a certificate of analysis for the batch must be presented. Please note that if there is a major change in the production process that affects the quality evaluation of the product, e.g. changes to the process, in-process controls, or ingredients, updated production documents will be required by SAHPRA. For editorial or minor changes (Type 1A variations or administrative changes), annual notifications will suffice, and SAHPRA will not require submission of updated production documents.

3.2.R.7.1 Executed production documents

Copies of the executed production documents should be provided for the batches used in the comparative bioavailability or biowaiver studies. Any notations made by operators on the executed production documents should be clearly legible.

For solid oral dosage forms, the biobatch should, at a minimum, be one-tenth that of full production scale or 100 000 tablets or capsules, whichever is the larger.

For dosage forms that do not require a comparative bioavailability study, the executed production documents should be provided for the batches used in the product development.

Copies of executed manufacturing records should be in English, or translated into English where relevant.

#### 3.2.R.7.2 Blank / master production documents

Copies of the FPP master production documents must be provided for each manufacturing site, and should ideally be provided for each proposed strength and commercial batch size. Master production documents from a pilot scale batch will be sufficient, if the process has not yet been scaled up to production scale. Please note that the pilot batch size should correspond to at least 10% of the production scale batch or 100 000 tablets or capsules, whichever is the larger.

Where the EMA guidelines permit bracketing for commercial batch sizes, master production documents for the smallest and largest batches as validated will be sufficient.

The details in the master production documents should include, but not be limited to, the following:

- a) master formula;
- b) dispensing, processing and packaging sections with relevant material and operational details;
- c) relevant calculations (e.g. if the amount of API is adjusted based on the assay results or on the anhydrous basis);
- d) identification of all equipment by, at minimum, type and working capacity (including make, model and equipment number, where possible);
- e) process parameters (e.g. mixing time, mixing speed, milling screen size, processing temperature range, granulation end-point, tablet machine speed (expressed as target and range));
- f) list of in-process tests (e.g. appearance, pH, assay, blend uniformity, viscosity, particle size distribution, LOD, weight variation, hardness, disintegration time, weight gain during coating, leaker test, minimum fill, clarity, filter integrity checks) and specifications;
- g) sampling plan with regard to the:
  - i. steps where sampling should be done (e.g. drying, lubrication, compression),
  - ii. number of samples that should be tested (e.g. for blend uniformity testing of low dose FPPs, blend drawn using a sampling thief from x positions in the blender),
  - iii. frequency of testing (e.g. weight variation every x minutes during compression or capsule filling);
- h) precautions necessary to ensure product quality (e.g. temperature and humidity control, maximum holding times);

- i) for sterile products, reference to SOPs in appropriate sections and a list of all relevant SOPs at the end of the document;
- j) theoretical and actual yield;
- k) compliance with the GMP requirements.

If some of the required detail is contained in standard operating procedures (SOPs) and not in the master production document, the applicant should submit both the master production document and the relevant SOPs.

6.2.8 3.2.R.8 Other

Placeholder section for documents that do not have a specified location in the CTD folder structure, but which the applicant deems necessary for evaluation of the dossier. This includes the SCoRE document.

## Appendix 1: *In vitro* studies – Dissolution profile comparison

Please refer to the Dissolution guideline for more information

For biowaiver purposes the dissolution profiles in three media (and the main / specification dissolution medium if not one of the three dissolution media, as described in the Dissolution Guideline), of the test and the reference product should be tested for similarity. The  $f_2$  similarity factor should be used to compare dissolution profiles from different products and / or strengths of a product. An  $f_2$  value  $\geq 50$  indicates a sufficiently similar dissolution profile such that further *in vivo* studies are not necessary. For an  $f_2$  value  $< 50$ , it may be necessary to conduct an *in vivo* study. However, when both test and reference products dissolve 85% or more of the label amount of the API in  $\leq 15$  minutes similarity is accepted without the need to calculate  $f_2$  values.

### 1 Proportionally similar formulations

#### a. Proportionally Similar Dosage Forms/Products

Pharmaceutical products are considered proportionally similar in the following cases:

- When all APIs and inactive pharmaceutical ingredients (IPIs) are in exactly the same proportion between different strengths (e.g. a 100 mg strength tablet has all API and IPIs exactly half of a 200 mg strength tablet and twice that of a 50 mg strength tablet).
- When the APIs and IPIs are not in exactly the same proportion but the ratios of IPIs to the total mass of the dosage form are within the limits defined by the Amendments guideline.
- When the pharmaceutical products contain a low concentration of the APIs (e.g. less than 5%) and these products are of different strengths but are of similar mass. The difference in API content between strengths may be compensated for by mass changes in one or more of the IPIs provided that the total mass of the pharmaceutical product remains within 10 % of the mass of the pharmaceutical product on which the bioequivalence study was performed. In addition, the same IPIs should be used for all strengths, provided that the changes remain within the limits defined by the Amendments guideline.

A prerequisite for qualification for a biowaiver based on dose-proportionality of formulations is that:

- The multisource product at one strength has been shown to be bioequivalent to the corresponding strength of the reference product.
- The further strengths of the multisource product are proportionally similar in formulation to that of the studied strength.

When both of these criteria are met and all the dissolution profiles of the further dosage strengths are shown to be similar to the one of the studied strength on a percentage released vs. time basis, the biowaiver procedure can be considered for the further strengths.

*b. Immediate release tablets*

When the pharmaceutical product is the same dosage form but of a different strength and is proportionally similar in its API and IPIs, a biowaiver may be acceptable.

*c. Modified Release Products*

A *modified-release dosage form* is one for which the API release characteristics of time course and/or location are chosen to accomplish therapeutic or convenience objectives not offered by conventional dosage forms such as solutions, ointments, or promptly dissolving dosage forms. Delayed-release and extended-release dosage forms are two types of modified-release dosage forms.

*Delayed-release dosage forms* - A delayed-release dosage form is one that releases an API(s) at a time other than promptly after administration.

*Extended-release dosage forms* - An extended-release dosage form is one that allows at least a twofold reduction in dosing frequency or significant increase in patient compliance or therapeutic performance as compared to that presented as a conventional dosage form (e.g. as a solution or a prompt drug-releasing, conventional solid dosage form).

The terms controlled release, prolonged action, and sustained release are used synonymously with extended release. This document uses the term extended release to describe a formulation that does not release an API immediately after oral dosing and that also allows a reduction in dosage frequency. This nomenclature accords generally with the USP definition of extended release but does not specify an impact on dosing frequency. The terms controlled release and extended release are considered interchangeable in this guidance.

Modified release products include delayed release products and extended (controlled) release products. In general, bioequivalence studies are required. In addition to the studies required for immediate release products, a food-effect study is necessary. Multiple dose studies are generally not recommended (see Dissolution guideline).

*Beaded Capsules - Lower Strength*

For extended release beaded capsules where the strength differs only in the number of beads containing the API, a single-dose, fasting BE study should be carried out on the highest strength. A biowaiver for the lower strength based on dissolution studies can be requested. Dissolution profiles in support of a biowaiver should be generated for each strength using the recommended dissolution test methods and media described in the Dissolution guideline.

*d. Tablets – Lower strength*

For extended release tablets when the pharmaceutical product is:

- i. in the same dosage form but in a different strength, and
- ii. is proportionally similar in its APIs and IPIs, and

iii. has the same drug/API release mechanism,

an *in vivo* BE determination of one or more lower strengths may be waived based on dissolution testing as previously described. Dissolution profiles should be generated on all the strengths of the test and the reference products.

When the highest strength (generally, as usually the highest strength is used unless a lower strength is chosen for reasons of safety) of the multisource product is bioequivalent to the highest strength or dose<sup>2</sup> of the reference product, and other strengths are proportionally similar in formulations and the dissolution profiles are similar between the dosage strengths, biowaiver can be considered to lower / other strengths.

## **2 Reference Products registered in South Africa but procured in another country, the regulatory authority of which SAHPRA aligns itself with**

Bioequivalence studies submitted where a foreign reference product has been used, will require demonstration of equivalence between the foreign product and the innovator product marketed in South Africa. If the reference product is not the current innovator product available on the SA market, then the reference product may be procured from another country provided that it complies with the requirements specified in the Pharmaceutical & Analytical guideline.

Dissolution profiles of the test and reference products should be compared for similarity as described in the Dissolution Guideline for each of the three specified media irrespective of the solubility and/or stability profiles. Further evidence in the main/specification dissolution medium, if not one of the required dissolution media, should be provided.

## **3 Variations**

Although this guideline comments primarily on registration requirements for multisource pharmaceutical products, *in vitro* dissolution testing may also be suitable to confirm similarity of product quality and performance characteristics with minor formulation or manufacturing changes after approval.

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2. Dose included in the dosage range of the SAHPRA-approved package insert of the innovator product registered in South Africa

## Appendix 2: Sameness declaration for reliance-based evaluation models

To be completed by the applicant:

Application for {Application number, if allocated} {Proposed product name}	{Name of recognised regulatory authority}
Registration date	
Date(s) of approval of post-registration variation(s) if applicable	

I, {Full name}, {Job title} at {Company's full legal name}, hereby confirm the following for application {Application number, if allocated} submitted to the South African Health Products Regulatory Authority (SAHPRA) on {Date of application submission}:

- The information and documentation provided in support of this submission for registration is true and correct.
- The product submitted for registration with SAHPRA is the same as the product registered with the above-specified regulatory authority or authorities.
- The technical information in the dossier submitted to SAHPRA for registration is the same as the technical information approved by the above-specified regulatory authority or authorities, taking into account all variations that the above-specified regulatory authority or authorities have approved since registration.

The "same" product is characterised by:

- The same product dossier content;
  - **Note:** For WHO PQ vaccines submitted to the WHO in Product Summary File (PSF) format, this content needs to be transferred to CTD format
- The same manufacturing chain, processes and control of materials and finished product, and in the case of vaccines also by the same batch release scheme;
- The same active pharmaceutical ingredient (API) and finished pharmaceutical product (FPP) specifications
- The same essential elements of product information for pharmaceutical products, and in the case of vaccines, by the same product information, packaging presentation and labelling.

Information which need not be the same:

- Module 1, i.e. region-specific administrative requirements

- Module 3.2.R, i.e. region-specific requirements to enable bioequivalence evaluation with a country-specific comparator if required

Minor differences which are not considered essential may include differences in administrative information, brand name, format and level of detail of product information as per regional requirements, labelling of internal and external packaging and language of product information.

I hereby confirm that if documents have been submitted by [Insert full company legal name here] which were received by the above-specified regulatory authority or authorities, these documents are complete and unredacted.

Full name of Responsible pharmacist / Person authorised to communicate with the authority:

Job title, company:

Email address:

Telephone number:

Signature:

Date:

Place:

### Appendix 3: Declaration for previous P&A Committee approval

{Product name} – {Application number}

I, {Full name}, {Job title} at {Company’s full legal name}, hereby confirm the following for application {Application number} for product {Proposed product name} originally submitted to the South African Health Products Regulatory Authority (SAHPRA) or the Medicines Control Council (MCC) on {Original submission date}, and resubmitted to SAHPRA’s Backlog Clearance Program on {Resubmission date):

- The information and documentation provided in support of this submission for registration is true and correct.
- No changes have been made to the application approved by SAHPRA or the MCC on {Approval letter date} which would impact the prior approval(s), i.e. the dossier resubmitted to the Backlog Clearance Program is identical to the approved dossier, **OR**
- If change(s) have been made, please provide a summary of the changes below and include a tabulated schedule of changes in your submission

Relevant section of dossier	Original submission	Description of change and updated submission

*[Please add / subtract rows from the table as required]*

If any of the above confirmations are found by SAHPRA to be incorrect and/or misleading, SAHPRA reserves the right to reject the application.

Full name of Responsible pharmacist / Person authorised to communicate with the authority:

Job title, company:

Email address:

Telephone number:

Signature:

Date:

Place: