



Notice to applicant

**Central Administration of Pharmaceutical Products  
General Administration For Human Pharmaceutical Products  
Administration of Human Pharmaceuticals Variations**

## **Relevant Sections of CTD file for Human Pharmaceutical Variations Year 2026**

**Code: EDREX:NP. CAPP.112**

**Version No: 1**

**Issue Date: 1/07/2026**

**Effective date (if needed): 1/07/2026**



## Table of Contents

#	Content	Page
1	Introduction	3
2	Scope	3
3	Abbreviations	3
4	Definitions	3
5	Body Of Data	4-13
6	References	13
7	Annexes	13



## 1-Introduction

This guidance aims to provide applicants with the required information for Relevant Sections of CTD file for Human Pharmaceutical Variations

## 2-Scope

This guidance applies to all Human Pharmaceutical Products Submitted for Evaluation under The Administration of Variations for Human Pharmaceuticals

## 3- Abbreviations

- 3.1. LOA: Letter of Access
- 3.2. CTD: Common Technical Document
- 3.3. CEP: Certificate of Suitability
- 3.4. DMF: Drug Master File
- 3.5. AP: Applicant Part
- 3.6. RP: Restricted Part

## 4- Definitions

- 4.1. Drug master file (DMF): is a document containing information on an Active Pharmaceutical Ingredient (API) containing factual information on a drug product's chemistry, manufacture, stability, purity, impurity profile and packaging.
- 4.2. The Common Technical Document (CTD): is a set of specifications for a dossier to be submitted to the regulatory authorities for the registration/marketing authorization of medicines.
- 4.3. Letter of access (LOA): is an original document that allows the owner of protected data to grant permission for its use under specific terms. It is typically signed by the data owner and enables third parties to utilize the data for regulatory purposes, such as obtaining authorizations for plant protection products or fulfilling compliance obligations.



## 5-Body Of Data

3.2. S	Drug substance [name, manufacturer]
3.2. S.1	General information
3.2. S.1.1	Nomenclature
3.2. S.1.2	Structure
3.2. S.1.3	General properties
3.2. S.2	Manufacture
3.2. S.2.1	Manufacturer(s)
3.2. S.2.2	Description of Manufacturing Process and Process Controls
3.2. S.2.3	Control of Materials
3.2. S.2.4	Controls of Critical Steps and Intermediates
3.2. S.2.5	Process Validation and/or Evaluation
3.2. S.2.6	Manufacturing Process Development
3.2. S.3	Characterization
3.2. S.3.1	Elucidation of Structure and other Characteristics
3.2. S.3.2	Impurities
3.2. S.4	Control of drug substance
3.2. S.4.1	Specification
3.2. S.4.2	Analytical Procedures
3.2. S.4.3	Validation of Analytical Procedures
3.2. S.4.4	Batch Analyses
3.2. S.4.5	Justification of Specification
3.2. S.5	Reference standards or materials
3.2. S.6	Container closure systems
3.2. S.7	Stability
3.2. S.7.1	Stability Summary and Conclusions
3.2. S.7.2	Post Approval Stability Protocol and Stability Commitment
3.2. S.7.3	Stability Data



3.2.P	Drug product (P part)
3.2.P.1	Description and Composition of the Drug Product (name, dosage form)
3.2.P.2	Pharmaceutical Development (name, dosage form)
3.2.P.2.1	Components of the Drug Product (name, dosage form)
3.2.P.2.1.1	Drug Substance (name, dosage form)
3.2.P.2.1.2	Excipients (name, dosage form)
3.2.P.2.2	Drug Product (name, dosage form)
3.2.P.2.2.1	Formulation Development (name, dosage form).
3.2.P.2.2.2	Overages (name, dosage form)
3.2.P.2.2.3	Physicochemical and Biological Properties (name, dosage form)
3.2.P.2.3	Manufacturing Process Development (name, dosage form)
3.2.P.2.4	Container Closure System (name, dosage form).
3.2.P.2.5	Microbiological Attributes (name, dosage form)
3.2.P.2.6	Compatibility (name, dosage form)
3.2.P.3	Manufacture (name, dosage form)
3.2.P.3.1	Manufacturer(s) (name, dosage form)
3.2.P.3.2	Batch Formula (name, dosage form)
3.2.P.3.3	Description of Manufacturing Process and Process Controls (name, dosage form)
3.2.P.3.4	Controls of Critical Steps and Intermediates (name, dosage form)
3.2.P.3.5	Process Validation and/or Evaluation (name, dosage form).
3.2.P.4	Control of Excipients (name, dosage form)
3.2.P.4.1	Specifications (name dosage form)
3.2.P.4.2	Analytical Procedures (name, dosage form)
3.2.P.4.3	Validation of Analytical Procedures (name, dosage form)
3.2.P.4.4	Justification of Specifications (name, dosage form)
3.2.P.4.5	Excipients of Human or Animal Origin (name, dosage form)



Notice to applicant

3.2.P.4.6	Novel Excipients (name, dosage form)
3.2.P.5	Control of Drug Product (name, dosage form).
3.2.P.5.1	Specification(s) (name, dosage form)
3.2.P.5.2	Analytical Procedures (name, dosage form)
3.2.P.5.3	Validation of Analytical Procedures (name, dosage form)
3.2.P.5.4	Batch Analyses (name, dosage form)
3.2.P.5.5	Characterization of Impurities (name, dosage form)
3.2.P.5.6	Justification of Specification(s) (name, dosage form)
3.2.P.6	Reference Standards or Materials (name, dosage form)
3.2.P.7	Container Closure System (name, dosage form)
3.2.P.8	Stability (name, dosage form)
3.2.P.8.1	Stability Summary and Conclusion (name, dosage form)
3.2.P.8.2	Post-approval Stability Protocol and Stability Commitment (name, dosage form)
3.2.P.8.3	Stability Data (name, dosage form)



## 5.1.S-Part

S	Variation Type	Relevant Sections of CTD file
1	Change in the name and /or address of: a manufacturer of the active substance / starting material, reagent or intermediate used in the manufacture of the active substance.	3.2.S.2.1, LOA in case of Change in the name and /or address of API manufacturer
2	Deletion of any Part from address of API Manufacturer EX. Unit, Plot	3.2.S.2.1, LOA
3	<b>Addition / Change in the manufacturer</b>	
	A. Addition or replacement of a new manufacturer for intermediate / starting material:	3.2.S.2.3 (for starting materials), 3.2.S.2.4 (for intermediates)
	B. Change in manufacturer of the active substance	
	<b>B.1. Addition or replacement of a new manufacturer for API:</b>	<b>For S Part:</b> New DMF (AP & RP), LOA, <b>For P-Part:</b> (3.2.P.1, 3.2.P.2.2.1(if Required), 3.2.P.5.4, 3.2.P.8)
	<b>B.2. Changes to quality control testing arrangements for the active substance-replacement or addition of a site where batch control/testing takes place</b>	3.2. S.2.1
<b>B.3. Addition or replacement of a new site of Micronization of the active substance</b>	3.2.S.2.1, 3.2.S.4.4 (in case of different particle size)	
4	Changes in the manufacturing process of the active substance	<b>For S Part:</b> Updated 3.2.S.2 (restricted part) + summary of change, 3.2.S.3.2, 3.2.S.4, 3.2.S.7 <b>For P Part:</b> 3.2.P.8 (If Required)
5	Change in batch size of active substance	Updated 3.2.S.2 (restricted part), 3.2. S.4.4
6	Change to in-process tests or limits applied during the manufacture of the active substance	<b>For S Part:</b> 3.2. S.2.4 <b>For P Part:</b> 3.2. P.5.4 (if Required)
7	Change in the specification parameters and/or limits of an active substance	<b>For S Part:</b> 3.2. S.4, 3.2. S.7, 3.2. S.3.2 (if Required) <b>For P Part:</b> 3.2.P.2.2.1(if Required), 3.2.P.8 (If Required)



8	Change to analytical procedure for active substance	3.2.S.4.2, 3.2.S.4.3, 3.2.S.5 (If Required)
9	Change in immediate packaging of the active Substance	3.2.S.6, 3.2. S.7
10	Change in specification or acceptance criteria of immediate packaging of the active Substance	3.2. S.6
11	Change in analytical procedure for immediate packaging of the active Substance	3.2. S.6
12	Change in the retest period/storage period or storage conditions of the active substance	
	<b>a) Retest period / storage period:</b>	
	<b>1. Reduction</b>	3.2. S.7
	<b>2. Extension or introduction of a retest period / storage period supported by real time data.</b>	3.2.S.7 (with cover page from the supplier directly)
	<b>b) Storage conditions</b>	3.2. S.7
	<b>c) Change to approved Stability Protocol</b>	3.2. S.7
13	Submission of a new or updated Ph. Eur. certificate of suitability or deletion of Ph. Eur. certificate of suitability for an active substance	Updated CEP, Updated Applicant Part related to the changes in the CEP (e.g. 3.2. S.4, 3.2.S.6, 3.2.S.7)



## 5.2.P-Part

S	Variation Type	Relevant Sections of CTD file
1	Change or addition of imprints, bossing (embossing/debossing) or other markings including replacement, or addition of inks used for product marking	3.2.P.1, 3.2.P.2.1.2 (if Required) and 3.2.P.4 (in case of change or addition of ink), 3.2.P.5.1 and 3.2. P.5.4
2	Change in the shape or dimensions of the pharmaceutical form	3.2.P.1, 3.2.P.5.1 and 3.2. P.5.4 (if Required)
3	Changes in the composition (excipients) of the finished pharmaceutical product	3.2.P.1, 3.2.P.2.1.2, 3.2.P.2.2.1(if Required), 3.2.P.3.2, 3.2.P.3.3, 3.2.P.4, 3.2.P.5.1, 3.2.P.5.4 and 3.2.P.8
4	Change in coating weight of oral dosage forms or change in weight of capsule shell	3.2.P.1, 3.2.P.2.2.1, 3.2.P.3.2, 3.2.P.5.1, 3.2. P.5.4,3.2. P.8 (if Required)
5	Change in the manufacturing site for part or all of the manufacturing process of the finished product	<ul style="list-style-type: none"> <li>• <u>Manufacturing site:</u> 3.2.P.3, 3.2.P.2.2.1 (If Required) 3.2.P.5.4, 3.2.P.8, 3.2.R.1.1 Executed production documents, 3.2.R.1.2 Master production document</li> <li>• <u>Batch release site:</u> 3.2.P.3.1</li> <li>• <u>Packaging Site:</u> 3.2.P.3.1, (In case of 1ry packaging) 3.2.P.5.4, 3.2.P.8 (if Required)</li> <li>• <u>Storage site:</u> 3.2. P.3.1</li> </ul>
6	Change in the manufacturing process of the finished product, including an intermediate used in the manufacture of the finished product	3.2.P.2.3, 3.2.P.3.3, 3.2.P.3.4, 3.2.P.3.5, 3.2.P.5.4, 3.2.P.8. 3.2.R.1.1 Executed production documents, 3.2.R.1.2 Master production document



7	<b>Change in the batch size of the finished product Scaling up or down of FPP production batch size (Local/ UL / Imported Products)</b>	<b>3.2.P.2.2.1 (if Required), 3.2.P.3, 3.2.P.5.4(if Required), 3.2.P.8 (if Required), 3.2.R.1.1 Executed production documents, 3.2.R.1.2 Master production document</b>
8	<b>Change to in-process tests or limits applied during the manufacture of the finished product</b>	<b>3.2.P.3.3, 3.2.P.3.4, 3.2.P.3.5, 3.2. P.5.4</b>
9	<b>Deletion of a Manufacturing/Packaging site/ Batch Releasing Site of finished product</b>	<b>Updated 3.2. P.3.1</b>
10	<b>Change in Name / Address of Manufacturing site</b>	<b>Updated 3.2. P.3.1</b>
11	<b>Change/addition Solvent / Diluent manufacturer supplied for a FPP (Local / UL Products)</b>	<b>3.2.P.1, 3.2.P.2.6, 3.2.P.8 (In use Stability Study)</b>
12	<b>Change in the specification attribute and/or acceptance criteria of an excipient</b>	<b>3.2.P.4</b>
13	<b>Change in the specification attribute and/or limits of the Finished Pharmaceutical product</b>	<b>3.2.P.5 and 3.2.P.8 (In case the change is stability indicating)</b>
14	<b>Change in test (Analytical procedure) for the Finished Pharmaceutical product</b>	<b>3.2.P.5.1, 3.2.P.5.2, 3.2.P.5.3, 3.2.P.5.4. 3.2.P.8 (In case the change is stability indicating)</b>
15	<b>Change in immediate packaging of the finished product</b>	<b>3.2.P.1, 3.2.P.2.4, 3.2.P.5.4. (in case of sterile products), 3.2.P.7 and 3.2.P.8</b>
16	<b>Change in the specification attribute and/or acceptance criteria of the immediate packaging of the finished product</b>	<b>3.2.P.7</b>



17	Change in analytical procedure for the immediate packaging of the finished product	3.2.P.7
18	Change in shape of the container	3.2.P.1, 3.2.P.7 and 3.2. P.8 (If Required)
19	Change in pack size of the finished product	3.2.P.1, 3.2.P.7 and 3.2. P.8 (If Required)
20	Change in any part of the primary packaging not in direct contact with the finished product formulation	3.2.P.1 and 3.2. P.7
21	Change in manufacturer, sterilization process or supplier of packaging components (when mentioned in the dossier).	3.2. P.7
22	Change of a secondary packaging component of the finished product (including replacement or addition or deletion), when mentioned in the dossier	3.2.P.1 and 3.2. P.7
23	Change in the shelf-life or storage conditions of the Finished Pharmaceutical product	
	a. Reduction of the shelf life	3.2.P.8
	b. Extension of the shelf life	3.2.P.8
	c. Change in storage conditions of the Finished Pharmaceutical product or the diluted / reconstituted product	3.2.P.8



24	Clarification / Change of salt equivalence and / or crystalline state (e.g. hydrate, solvate, polymorph)	<p><b><u>In case of change:</u></b>  <b><u>For S Part:</u></b>  Updated DMF from supplier(s) with summary of change.  <b><u>For P Part:</u></b>  3.2.P.1, 3.2.P.2.1.1, 3.2.P.2.2.1, 3.2.P.3.2, 3.2.P.5.4, 3.2.P.8  <b><u>In case of clarification:</u></b>  <b><u>For P Part:</u></b>  3.2.P.1, 3.2.P.3.2, and 3.2.P.5.4, 3.2.P.8 (for old batches)  * in addition to if the Current Supplier DMF is Evaluated by EDA Please Submit S Part  <b><u>For S Part:</u></b>  3.2.S.1.3, 3.2.S.3.1, 3.2.S.7</p>
25	Clarification / Change of particle size for water Insoluble or sparingly soluble API (Particle size must be stated in suppliers COA by D90 or mesh size)	<p><b><u>In case of change:</u></b>  <b><u>For S Part:</u></b>  3.2.S.1.3, 3.2.S.3.1, 3.2.S.4.4, 3.2.S.7 (if Required).  <b><u>For P Part:</u></b>  3.2.P.1, 3.2.P.2.1.1, 3.2.P.2.2.1, 3.2.P.3.2, 3.2.P.5.4, 3.2.P.8  <b><u>In case of clarification:</u></b>  <b><u>For P Part:</u></b>  3.2.P.1, 3.2.P.3.2, and 3.2.P.2.2.1, 3.2.P.5.4 (for old batches)  * in addition to if the Current Supplier DMF is Evaluated by EDA Please Submit S Part  <b><u>For S Part:</u></b>  3.2.S.1.3, 3.2.S.3.1, 3.2.S.4.4, 3.2.S.7 (if Required)</p>



26	<p><b>Clarification / Change or Addition of the solvents used in manufacturing process</b></p> <p>(e.g. Purified Water /Ethanol or Methanol)</p>	<p><b>3.2.P.1, 3.2.P.2.1.2, 3.2.P.2.2.1 (in case of solvent in the core), 3.2.P.3.2, 3.2.P.5, 3.2.P.8 (In case the change is stability indicating)</b></p>
27	<p><b>Change in Color of Finished Pharmaceutical product</b></p>	<p><b>3.2.P.1, 3.2.P.4, 3.2.P.5.1, 3.2. P.5.4</b></p>

**Note :** Additional data may be required if it is necessary for the Submitted Variation Request

## 6- References

NA

## 7-Annexes

NA

## Document History

Version Number	Issue Date	Summery of Change
1	01/07/2026	New Issue