314.70 Public Hearing
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OPS/OGD

Outline

- Background
- Submission Statistics
- Current approaches in review management
- Future Objective

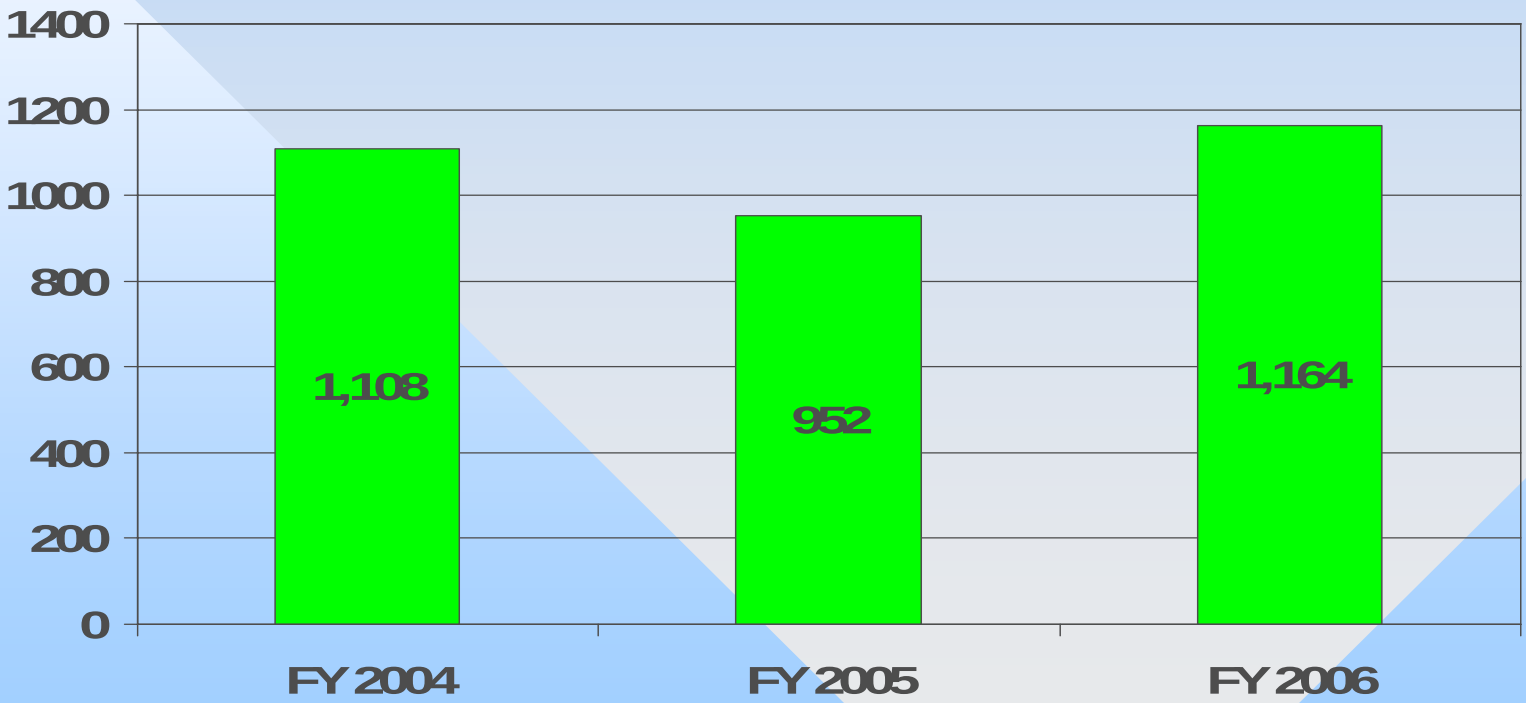
Background

- FDA Modernization Act - November, 1997
- Section 116 provides requirement for manufacturing changes
- 314.70 revised in April, 2004
- Changes guidance published – April 2004
- Pharmaceutical CGMPs for 21st Century – A risk Base Approach – September 2004
- PAT – September 2004
- Enforcement Discretion for Compendia Changes – November, 2004

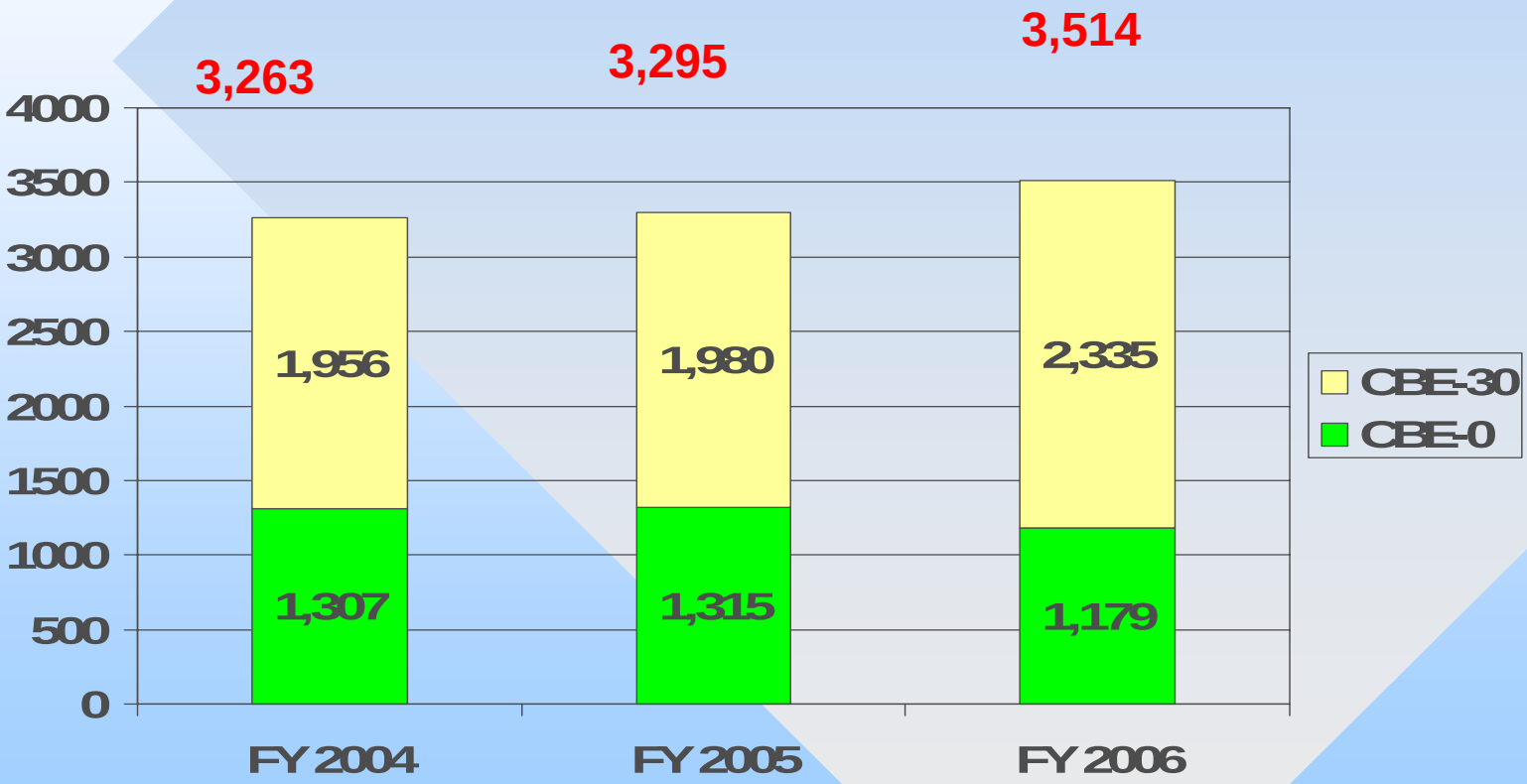
21 CFR 314.70 provide for four filing categories

- Category based on potential for adverse effect on ID, strength, quality, purity or potency
- major change substantial potential
- moderate change moderate potential
- minor change minimal potential

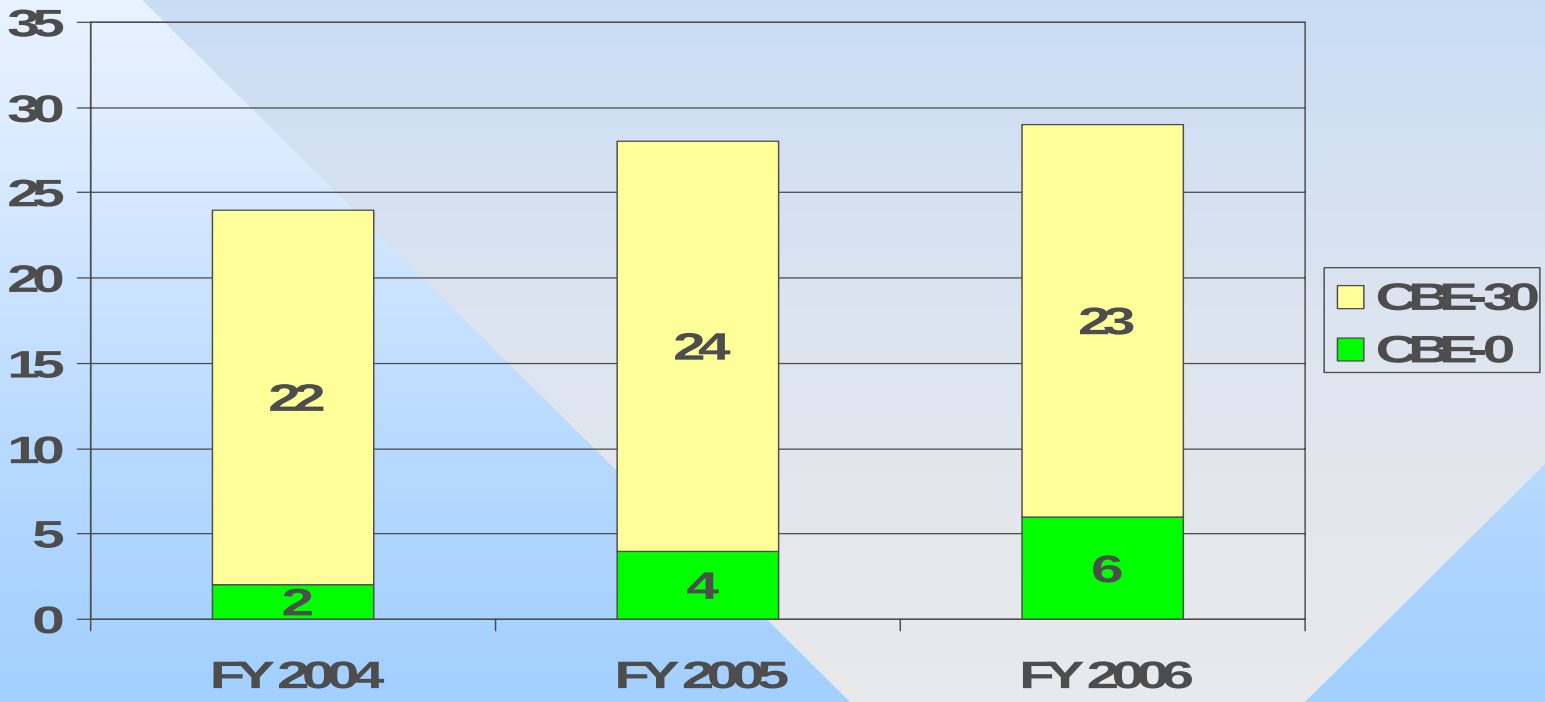
Prior Approval Supplements



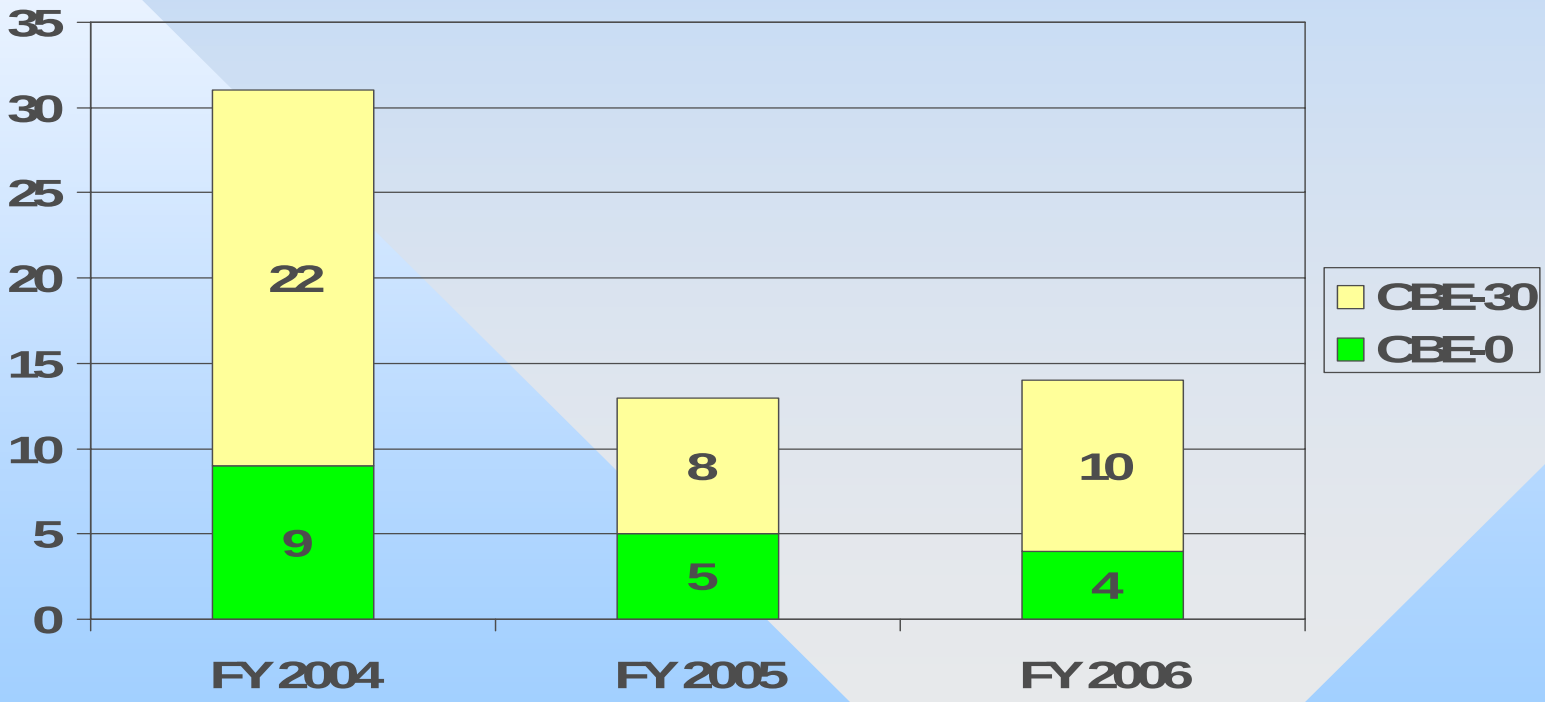
CBE Supplements



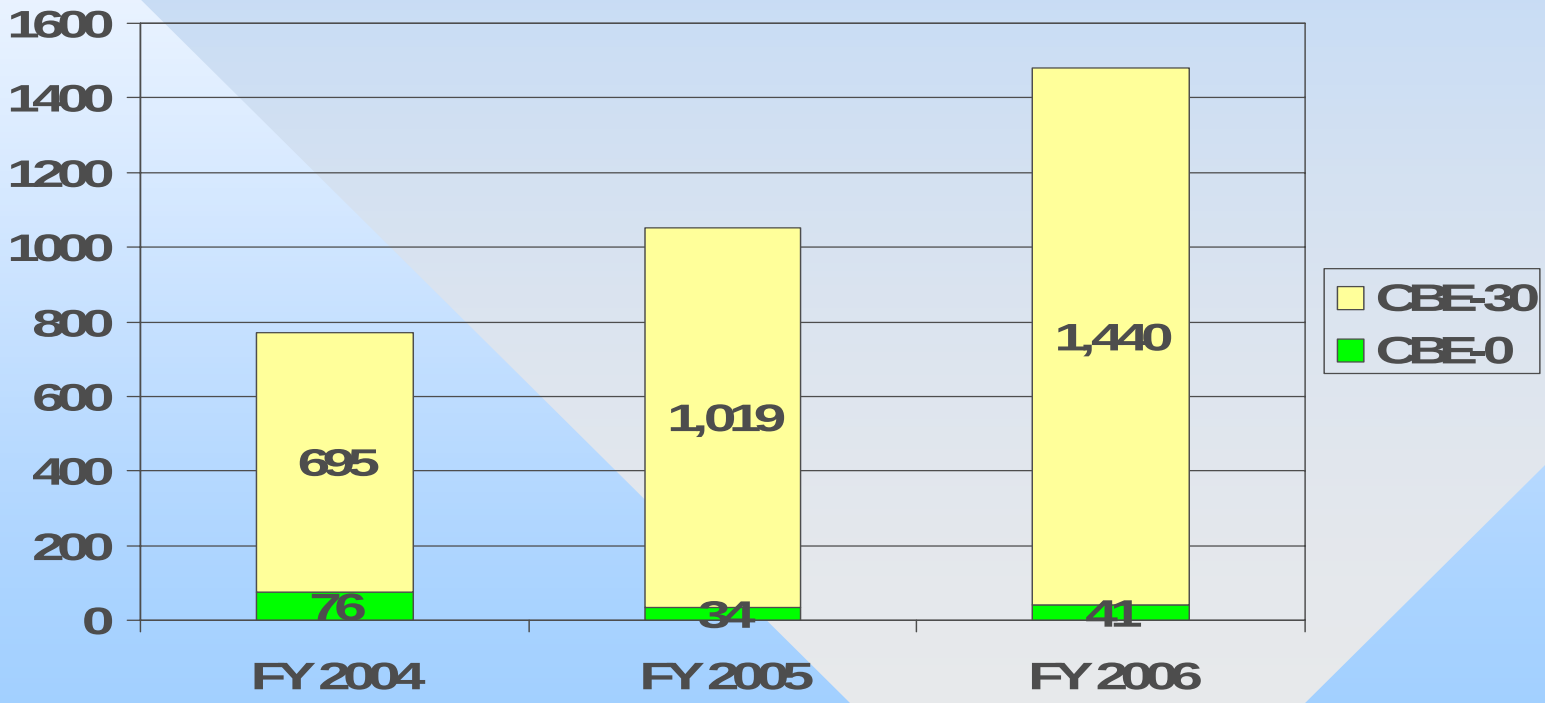
CBE Supplement Expiration Date



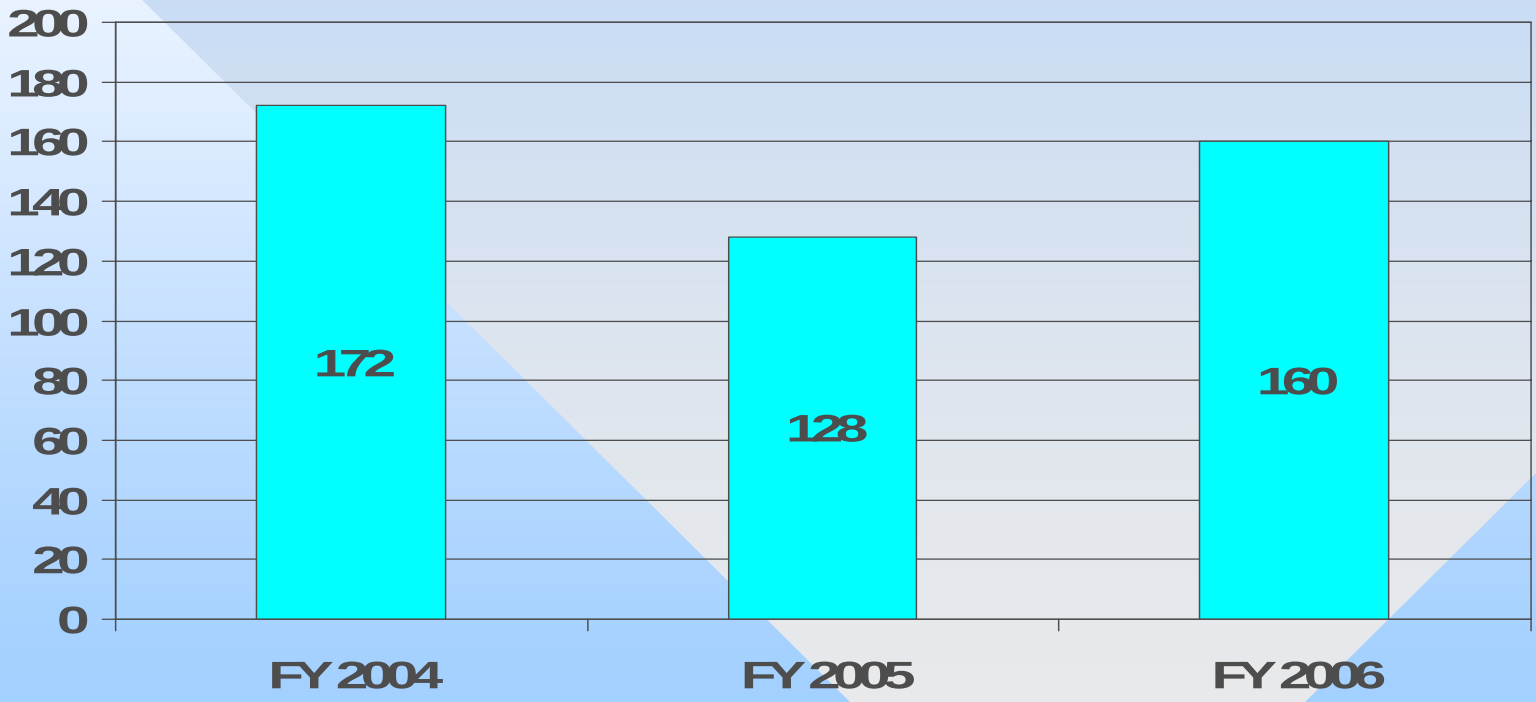
CBE Supplement Formulation Revision (SUPAC Level 1 Change)



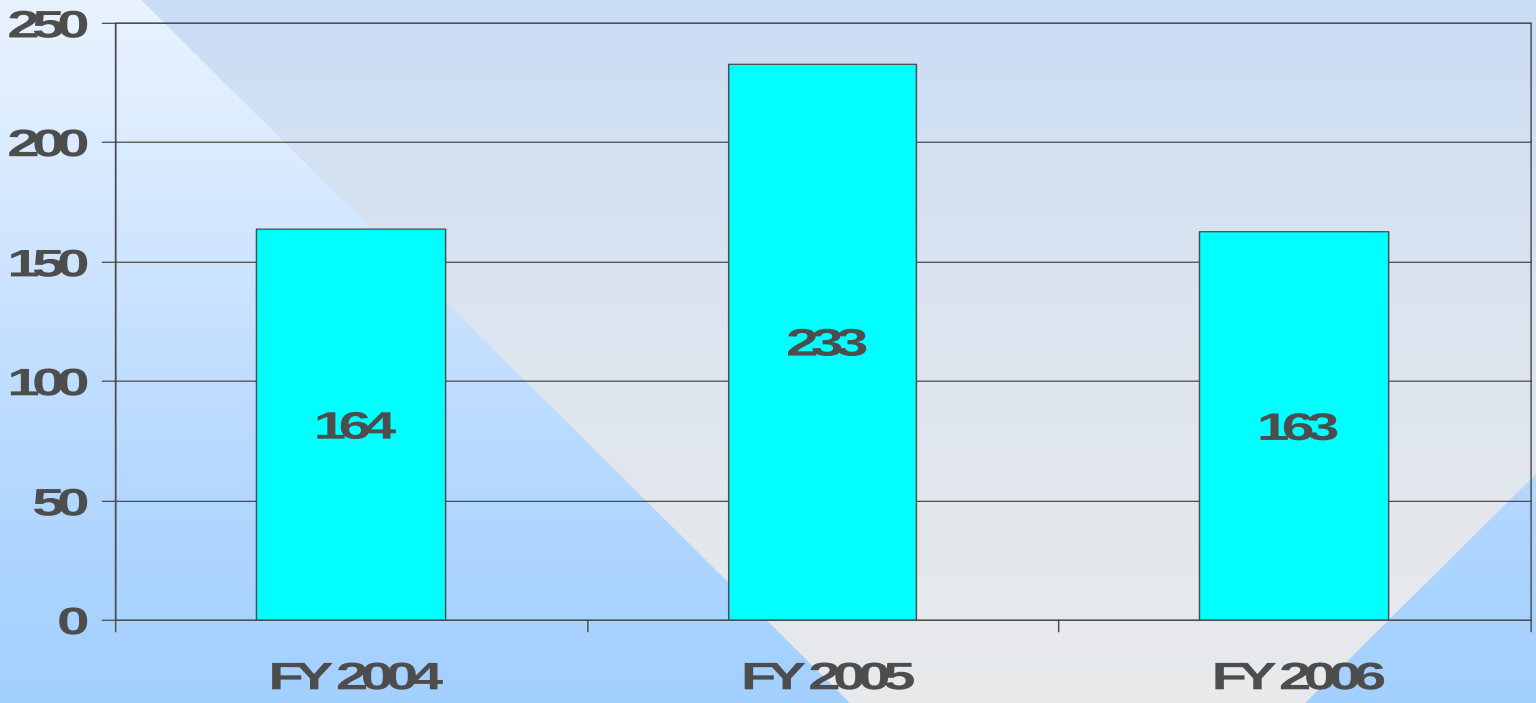
CBE Supplement Facility Addition



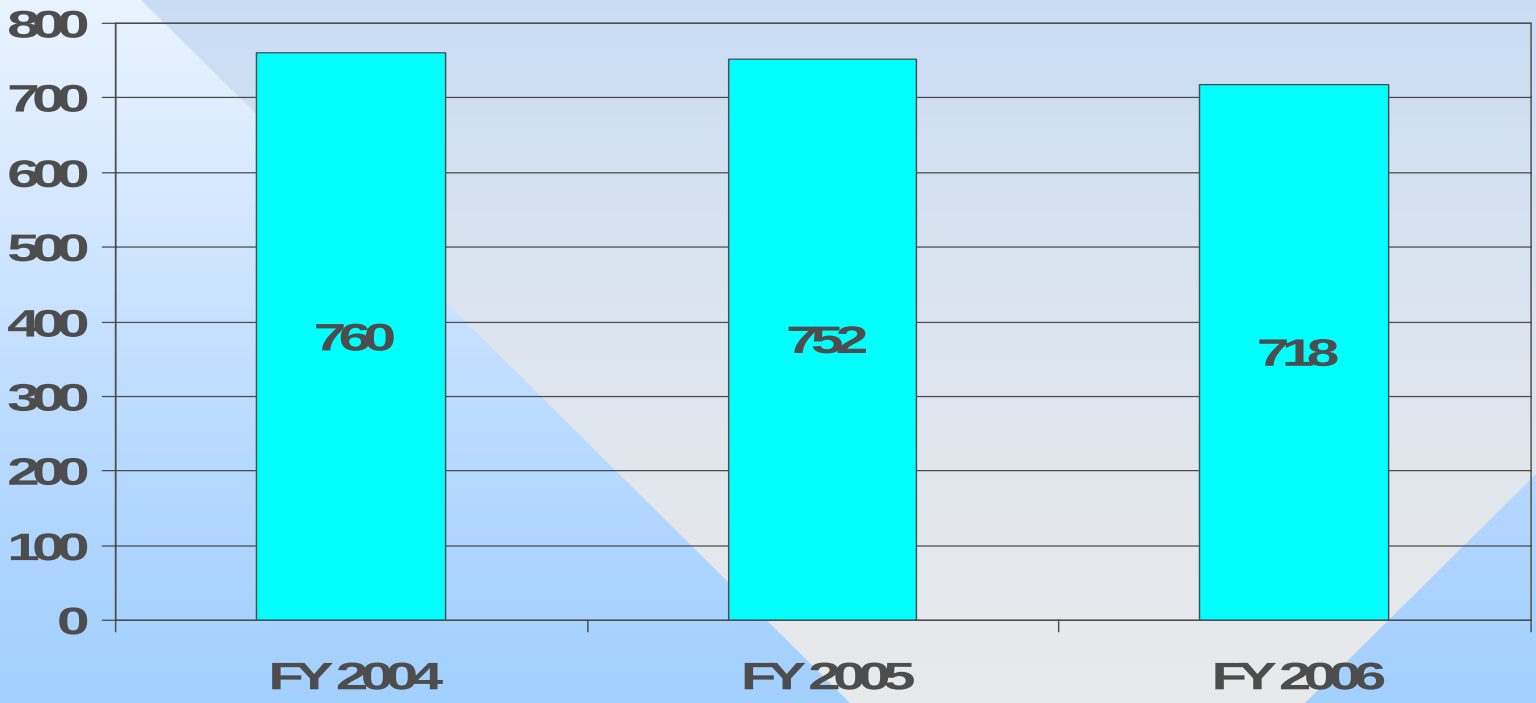
CBE Supplement
Manufacturing Revision



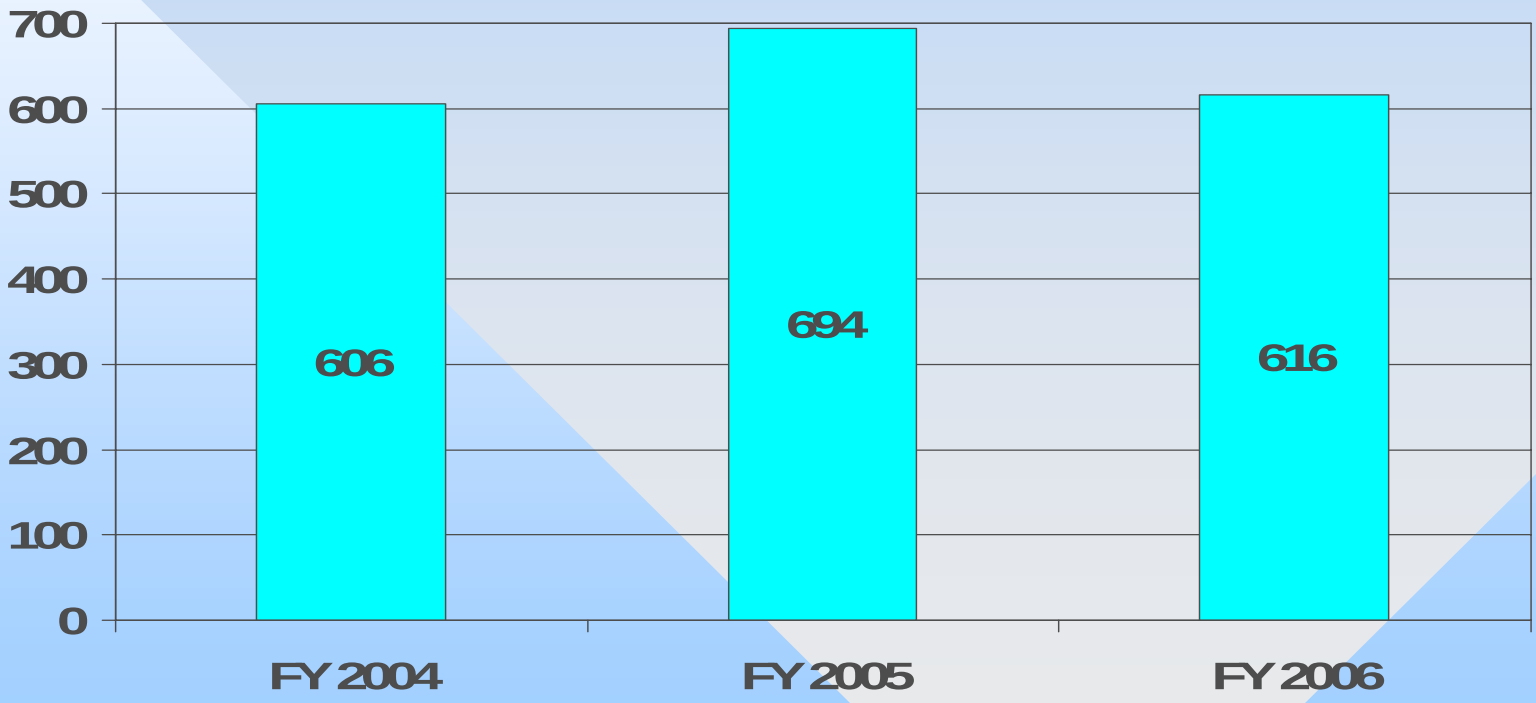
CBE Supplement
Packaging Change



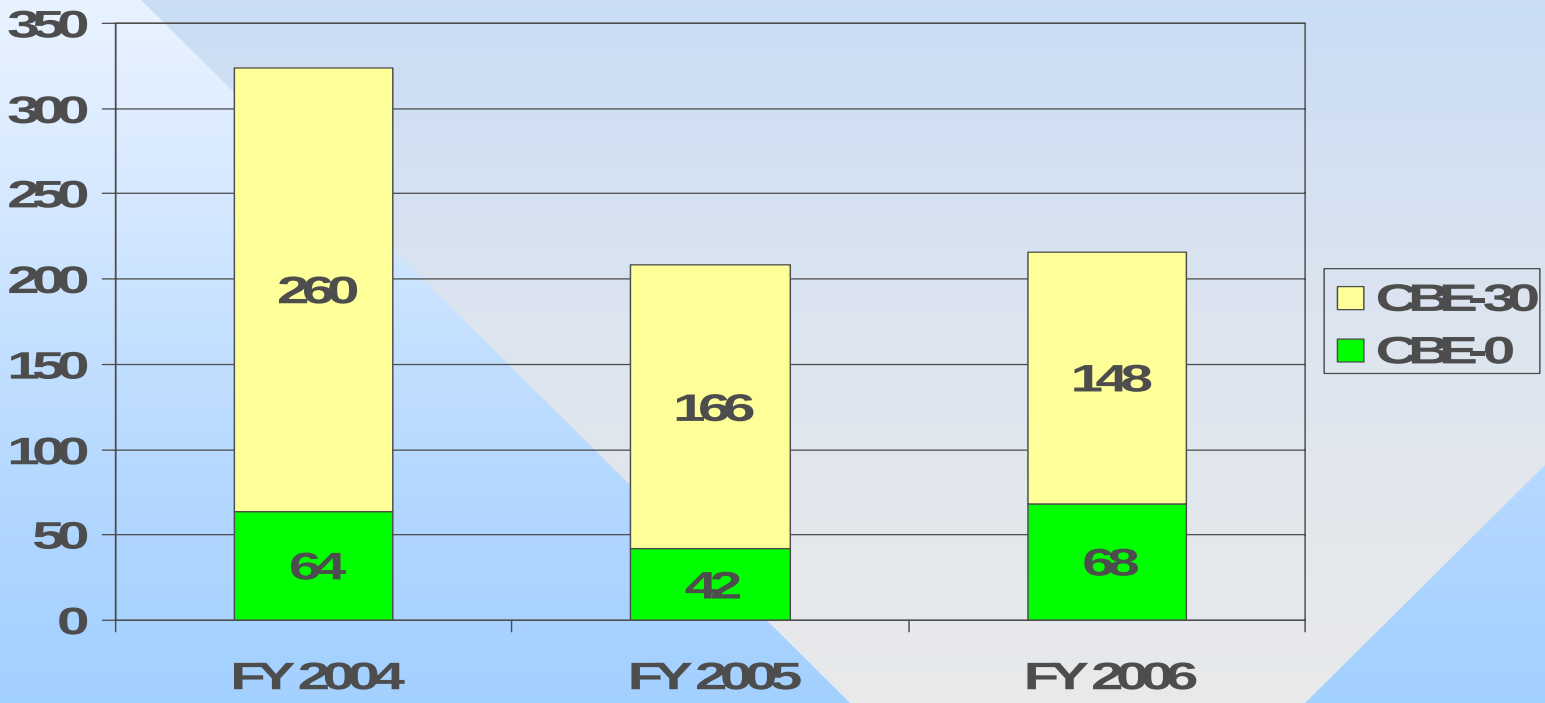
CBE Supplement
Control Revision



CBE Supplement
Labeling



CBE Supplement Microbiology



Current Approaches in Review Management

Legacy products

- Triage of CBE submissions at Team Level

  Based on type of change and risk associated

- Use of comparability protocols in change management

Future Objective

- Legacy products vs. new submissions
- Filing relief for legacy product – manage by comparability protocol
- For new submission – Recommending Question-based Review (QbR) submission
- QbR – knowledge gain in product development and provide scientific basis for change management in new submissions

Future Objective

- Material control, product & process understanding and factors critical for product quality
- Assess risk to product quality associated with each unit operation
- Roadmap for change management based on scientific understanding
- Scientific based risk assessment and change management
- Regulatory flexibility in filing requirement for post approval change