


# CHANGE MANAGEMENT

- Overseeing and Empowering – How to Achieve Balance ?
- Problem Statement
  - Change management is not visible to regulatory assessors
    - Change management is part of the PQS and the process is not necessarily described in specific regulatory submissions
  - What does the PQS need to include to effectively demonstrate appropriate process and criteria for evaluating changes through the lifecycle?
  - How can BoHs verify quality systems to ensure they provide for robust change management?
- What are Pfizer thinking ?
  - thoughts in progress on a ‘Change Management Master File’
  - From internal discussions between John Groskoph, Sudhanva Marathe, Roger Nosal and others

# Prerequisites to Managing Change

- **FOUNDATION** - Pharmaceutical Quality System
  - Robust ▲ &  **Management**
  - Framework for managing change, e.g., PCP/PCR process
  - Differentiate established vs. non-established conditions
  - FDA/EMA auditable & certified upon inspection
  - Filter changes based on risk, i.e. in PQS, Notification or PAS
- **BACKBONE** - Robust Product Control Strategy
  - Control strategy = Sum of all matters to be controlled in manufacture
  - Defined in regulatory application & consistent w/Established Conditions
  - PLUS Changes managed via PACMP/Comparability Protocols/Lifecycle MP
  - Reference to ▲ **Management Master File**

# A 'CHANGE MANGEMENT MASTER FILE' ?

- Compiled to describe / outline company or site process for change management
  - Can be broader than single product
  - Can be tailored for product types / specific products (with PACMPs)
  - Can describe change management for legacy products AND new products
- Inspectable and 'referenced' (not needing assessment and approval)
- Product specific components - specific PACMPs - approved
- Gives regulators visibility of change management approaches
- Can be 'same' to all regulatory agencies who adopt
- Empowers the company / site quality system
  - To make a broad set of specific changes using downgraded reporting (or without prior regulatory approval) based on robust PQS and QRM
  - Can be rolled on to suppliers
  - Can be of especial importance to primary tech transfer site who optimise and then feed-on mature processes to network

# Proposal: Change Management Master File

- Describes change management process
  - How changes are assessed and managed
    - Who is involved
    - How different 'tiers' of change are addressed and managed
    - The E-2-E process in the company
      - Including with suppliers to the company
  - How risks are assessed
    - How different changes can be assessed in appropriate ways
- Scope?
  - May be universal - all/multiple manufacturing sites
  - OR 'site specific' for a type of manufacturing site(s) - aseptic, packaging/labelling, SOD, etc.
  - Shaped to 'Product type/product'
    - Vx, mAbs, devices, etc.

Prior Approval



CBE 30, CBE 0,  
Type 1B



Notification



Managed w/in  
PQS

CHANGE MANAGEMENT MASTER FILE

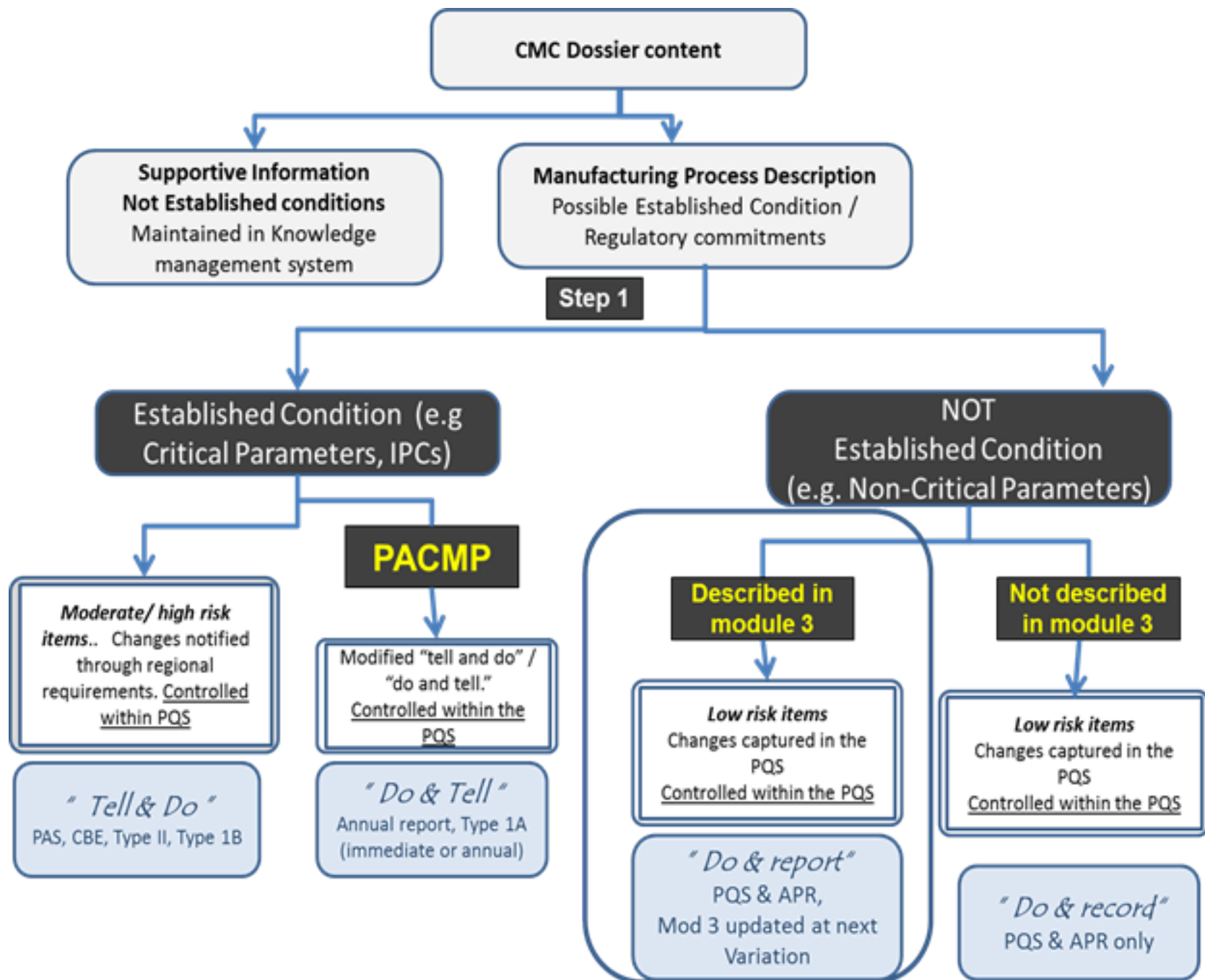
Robust  
▲ &  
Management

Robust &  
Certified  
PQS

Product  
Control  
strategy

# Change Management Master File (▲MMF )

- The ▲ Management Master File is not intended for submission in an application
  - Cross-referenced in regulatory applications
  - Supplemented with product-specific Comparability Protocol or PACMP as appropriate
  - Reviewed upon inspection
- Can be built to include expanded multi-product PACMPs
  - e.g., facility, network or regulatory change types
- Detailed description of the quality systems used to manage changes.
  - Verified & certified by regulatory authorities
  - Opportunity to reduce regulatory filing mechanism
  - Includes knowledge management continuity
    - Record of risk assessments throughout the life cycle

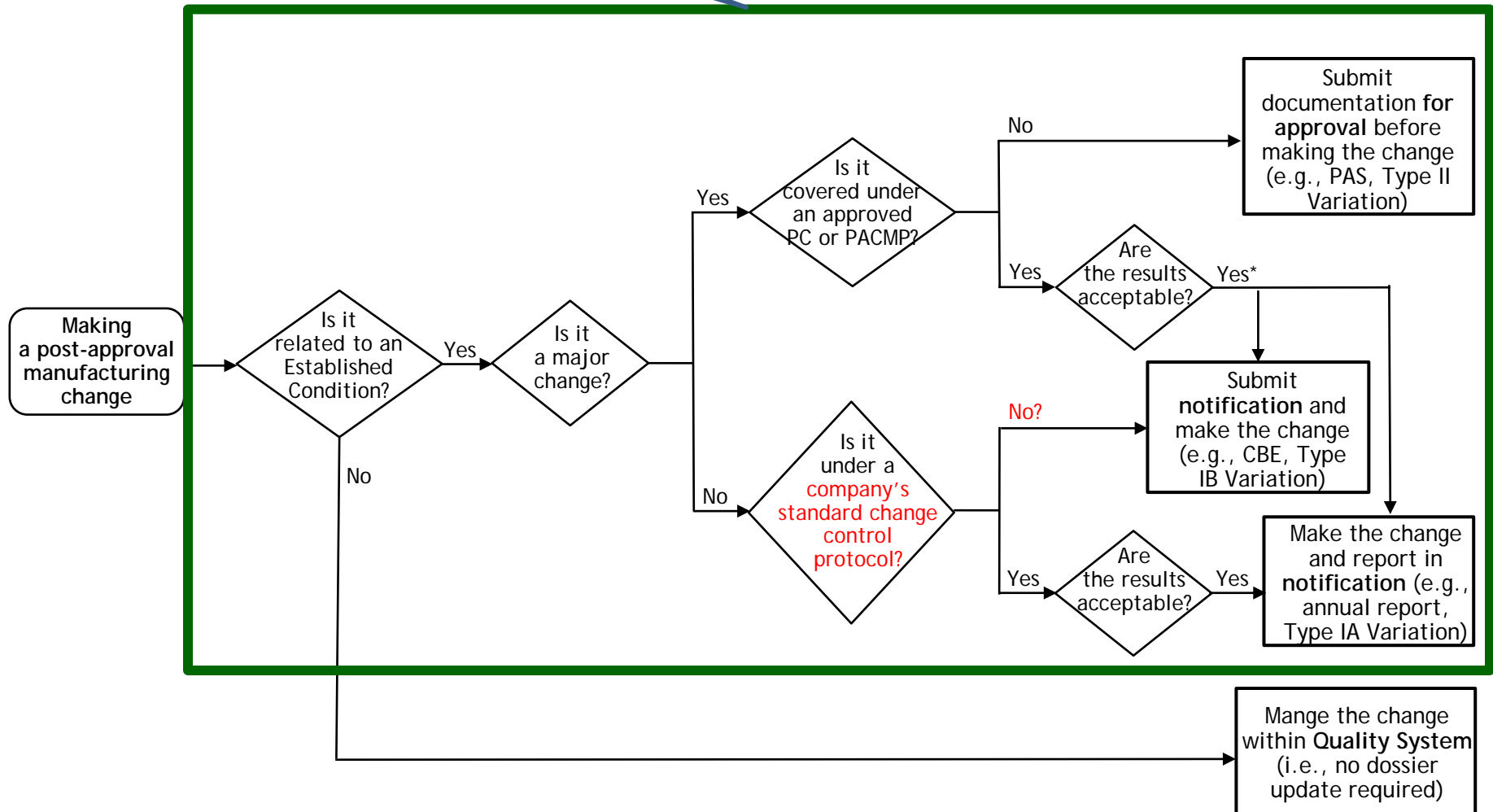


# Site specific changes managed in a

- Facility and equipment changes - e.g. environmental change (% RH, temp etc.) due to HVAC changes
- Network changes
- Changes to comply with new reg. requirements e.g. pharmacop change, labelling, Q3D
- Generalised changes - Design Space verification ; SM supplier change management
- Similar types of products
  - e.g., all solid oral dose roller compacted products
- Packaging change for all products within site
  - e.g., transition to S&T bottle
- Change of address (within site) to comply with certain regulatory markets
- Site Closure or major modifications

# Regulatory Pathways for Managing Post-Approval Changes

Change Management  
Master File Scope\*



\* There are potentially two different pathways in this situation, depending on the regulatory system in the country or region.