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LCM Week | Pills Recap

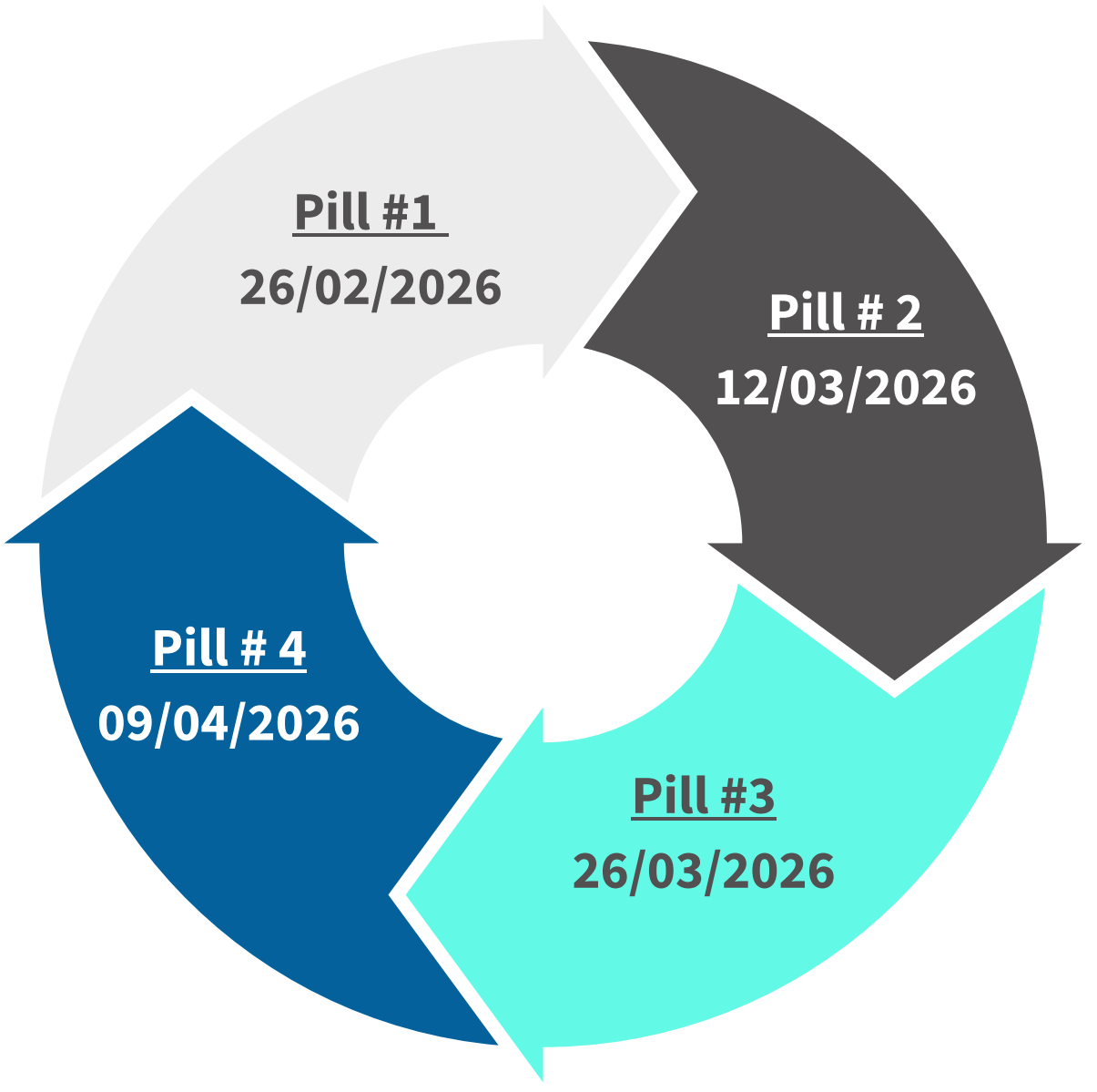
Bite-sized insights into the new Variations Guideline (Q1 2026)

by **Ana Viñas**

RECAP of the four pills published:

Scope:
To support Marketing Authorisation Holders (MAHs) in improving their regulatory strategies related to variations to the terms of marketing authorisations (MA) for medicinal products for human use.

Detailed in **FOUR** pills containing some of the most critical points found by the Applicants.



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1

How to use a **Certificate of Suitability** to the Monographs of the European Pharmacopoeia (CEP) in the context of a Marketing Authorisation Variation

Lessons learned:

- MAHs are **ultimately responsible** for the quality of APIs used in their finished product
- **Different types of CEPs** (chemical CEPs, sterile CEPs, TSE CEPs) / Different formats (old CEP", CEP 2.0, Hybrid CEP
- A new or revised Certificate of Suitability **should be submitted as a variation (Q.III)**
- Variations related to CEP include submission, update or deletion
- CEP does not replace: A Certificate of Analysis (CoA), A Qualified Person (QP) declaration, nor a GMP certificate

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2

How to prepare the **Precise Scope** section of the variation application form in the context of a Marketing Authorisation Variation

Lessons learned:

- For each type of variation, the description included in **precise scope** should be brief, specific and independent, complete, and outlining the change, based on:

  What changes?/ In which part of the dossier ?/ Why submit changes?

- Completing the e-AF (Section 3): Key considerations on :
  - Types of changes: specify the precise **present and proposed**, including **dossier section** number(s) at the lowest possible level (e-CTD)
  - Scope & Background: should include a brief explanation of the change(s) applied for the applicant

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3

How to select the **correct Procedure and the correct Variation procedure number** in the context of a Marketing Authorisation Variation

Lessons learned:

- The responsibility for determining the appropriate procedure remains with the MAH, who must provide a robust justification.
- Pill is a comprehensive help on how to select the correct Procedure and the correct Variation procedure number and for the classification, preparation & submission of post-authorisation variations at EU level
- Variation request strategy: What do we want?:

  Annual Update? / Super-grouping ?/ Worksharing?

4

What does the inclusion of **Article 5** recommendations -related unforeseen variations- mean for applicants?

Lessons learned:

Practical impact
EMA & National Competent Authorities. Should report annually to the European Commission on Article 5 recommendations, new resulting variation classifications and required updates for inclusion in the Guidelines

The Commission: Should reviews reports without undue delay and integrates new variation classifications & Necessary updates to the Variations Guidelines
Then, may publish an updated electronic version on its website

Applicants. Reduces discrepancies and misclassification across Member States, improves regulatory harmonization and allows lower administrative burden

Impact across the MA Lifecycle:
Classifications may change annually and applicants must continuously monitor EMA recommendations

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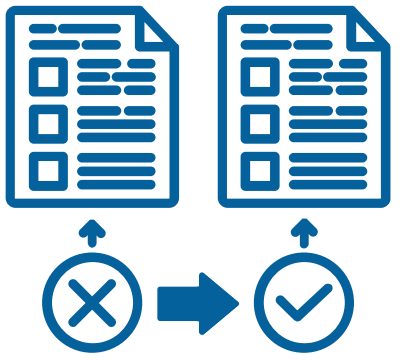
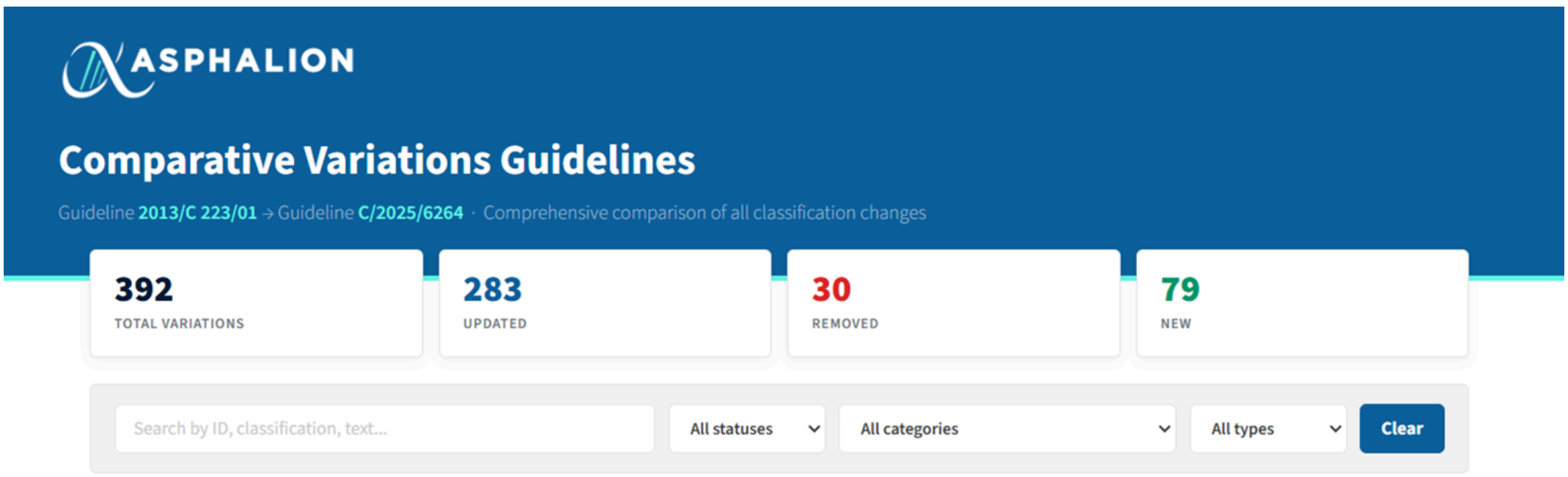


Comparative Variations Guideline | 2013 → 2025

AsphaMapper

COMPARATIVE VARIATIONS GUIDELINE



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AsphaMapper is a TOOL built on an in-depth analysis of the NEW categorization and classification framework set out in the NEW European Commission Guidelines (C/2025/5045), following the implementation of the NEW Commission Delegated Regulation (EU) 2024/1701

Comparative analysis of the old and new Annexes, based on the evaluation of the following elements for each variation:

- **Chapter Involved** (E, Q, C, M)
- **Categorisation** (Type IA / Type IB / Type II)
- **Classification and Status:** New (including historical art. 5) / Updated / Removed
  - Does this variation type appear for the first time in the annex?
  - Does it modify a previous one?
  - Does it change the requirements, wording, or scope of a pre-existing variation?
  - Did it already exist but is now reclassified with different letters and numbers?
- **Scientific documentation**: For each variation, details, where appropriate, on the scientific data to be submitted for specific variations and **how this data should be documented**

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COMPARATIVE VARIATIONS GUIDELINE

AsphaMapper is an automated support for guideline verification.

AsphaMapper helps regulatory teams to:

- Navigate guideline changes with confidence: Clear visual maps of classification changes
- Easily select the correct categorization and classification for each variation: Instant comparison of old *vs* updated guidelines
- Reduce regulatory risk and improve compliance

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Do you need **support with Variations?**

Contact us:
info@asphalion.com

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Check out our **AsphaMapper** free tool and compare the old and new EU Variations Guidelines!