

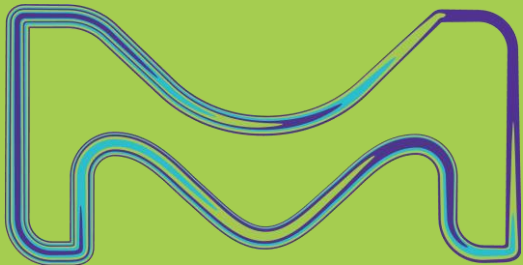
The businesses of Merck KGaA, Darmstadt, Germany operate as
EMD Serono, MilliporeSigma and EMD Electronics in the U.S. and Canada.

Pac* management

Global harmonization perspectives

Hanane Abdellah
Associate Director, Global Regulatory Affairs CMC

CASSS CMC Strategy Forum 7 November 2023



*post approval change

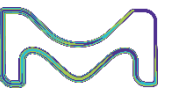
EMD
SERONO

MILLIPORE
SIGMA

EMD
ELECTRONICS

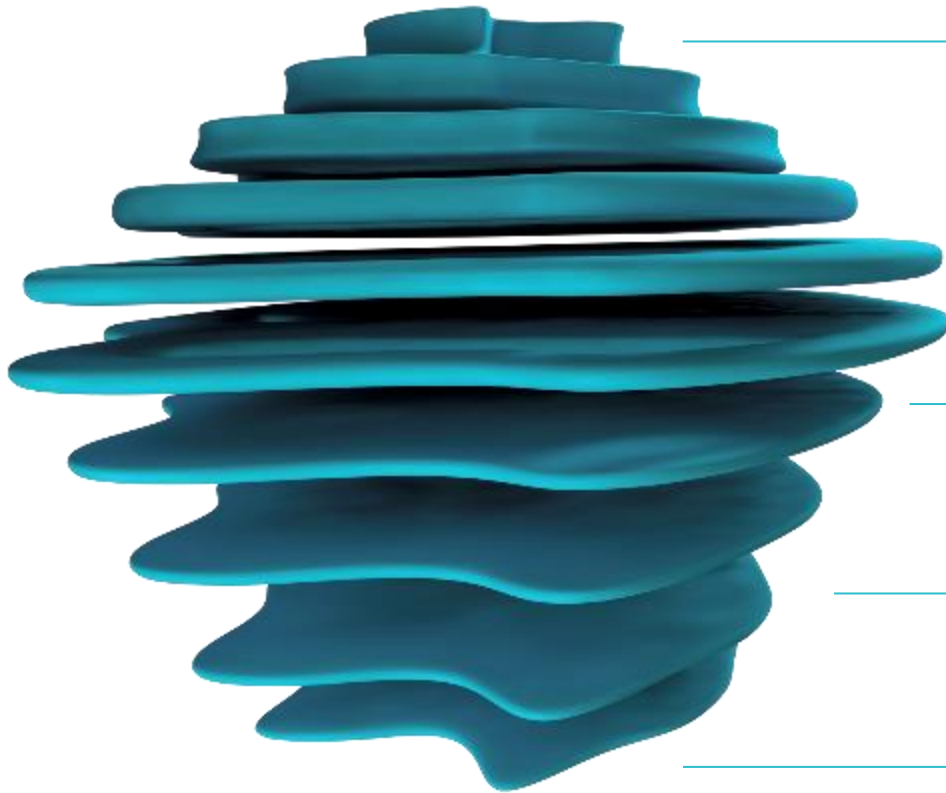
Disclaimer

The views and opinions expressed
during this presentation are strictly those of the
presenter and do not represent those of Merck KGaA



Post Approval Change Management - Global Harmonization Perspectives

Presentation Outline



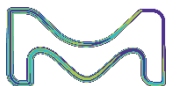
Current Landscape and Blue Sky Thinking

Post Approval Change Management – From the Manufacturer to the Patient

Post Approval Change Management – Challenges

Post Approval Change Management – How Can Industry and Regulators Act Together ?

Concluding Perspectives



Current Landscape

Increased complexity and speed to patient access

Compliance with evolving regulation

Technology evolution

Market demand

High number of post approval changes



**Evolving
Global
Regulatory
Environment**

Blue Sky Thinking

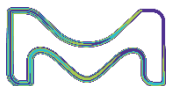
**Real Time
Approvals**

**One
Dossier/One
Platform
Worldwide**

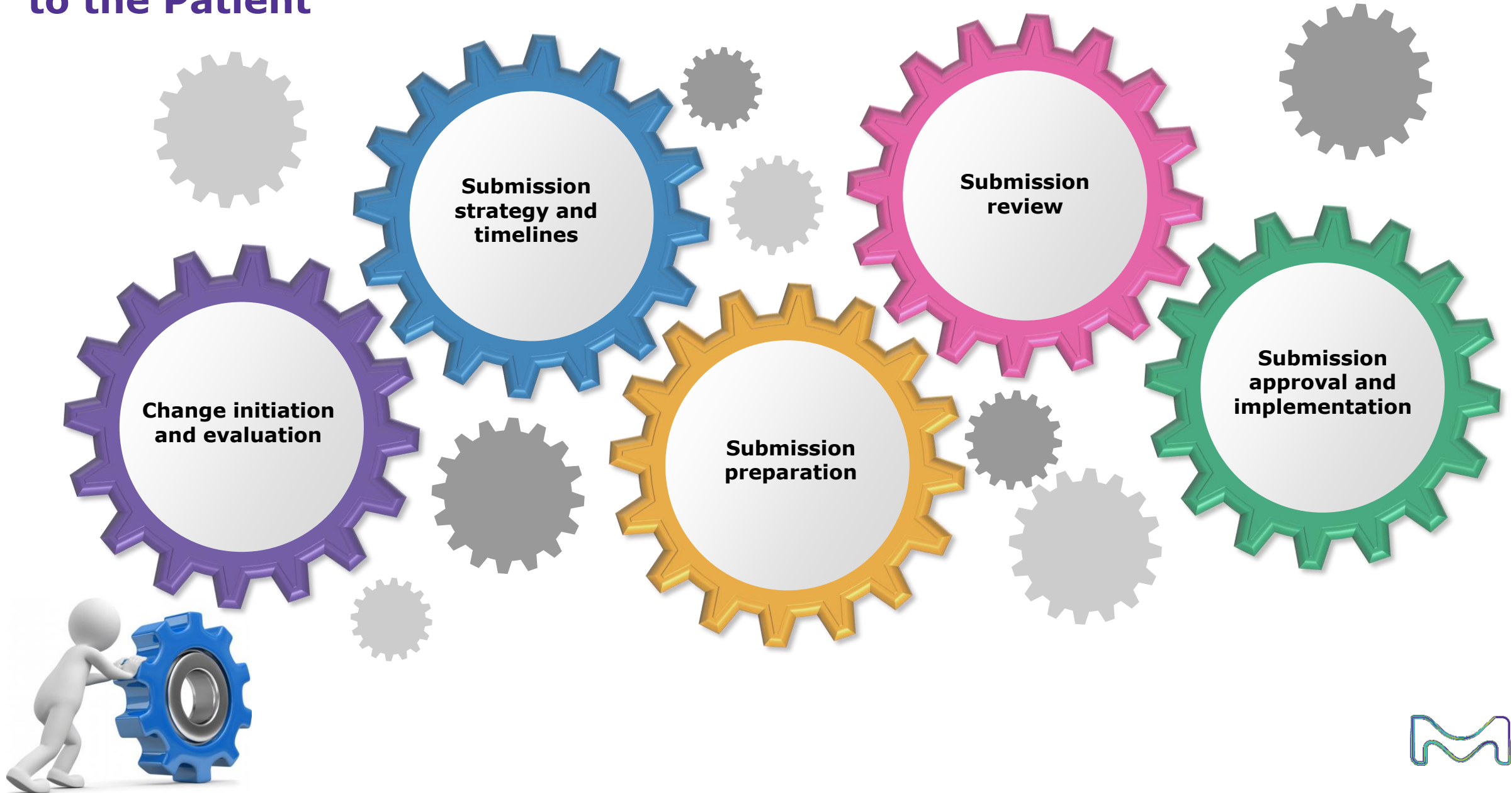
**Regulators
Shared Review**

**Artificial Intelligence
Aided Submission
Generation/Regulatory
Assessment**

**More Exchanges
between Industry and
Agencies**



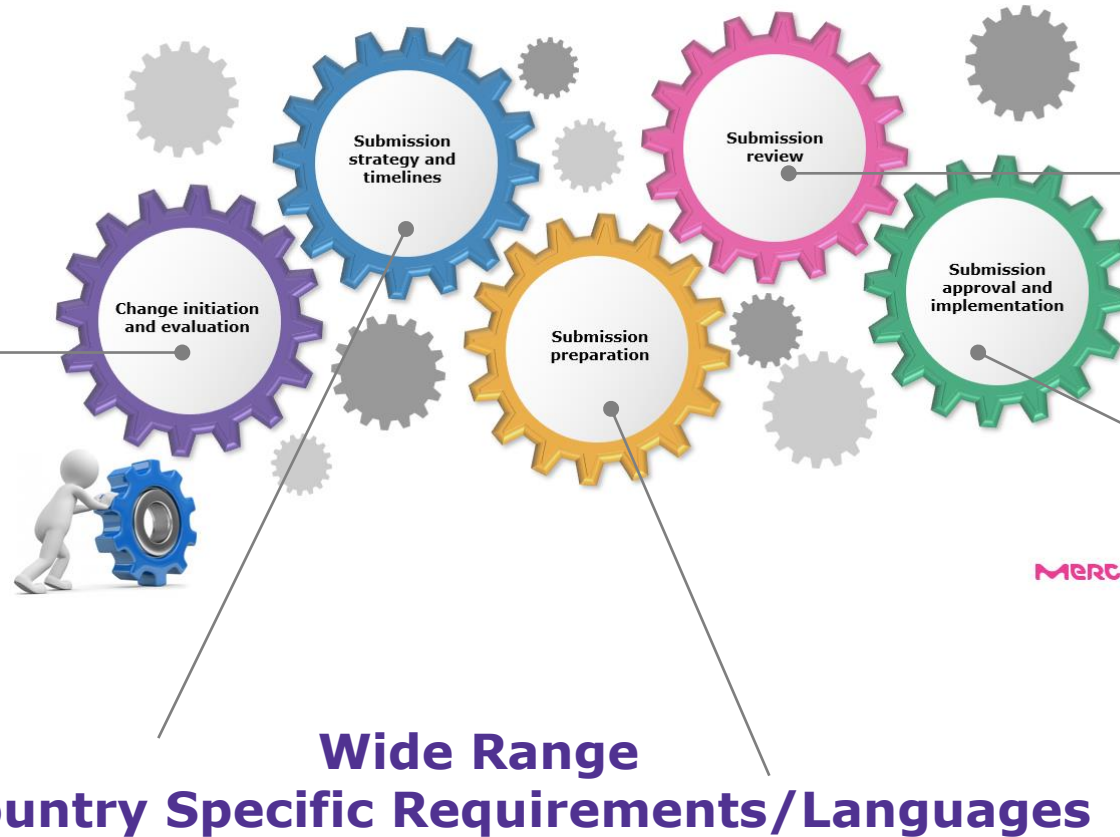
Post Approval Change Management – From the Manufacturer to the Patient



Post Approval Change Management – Challenges

Changes Reportability Divergence

Same minor change (minor quality impact) can be non-reportable for some countries and requiring prior approval for others



Heterogeneity in Health Authorities Review Time

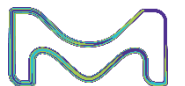
From 2 to 36 months and beyond

Wide Range of Country Specific Requirements/Languages

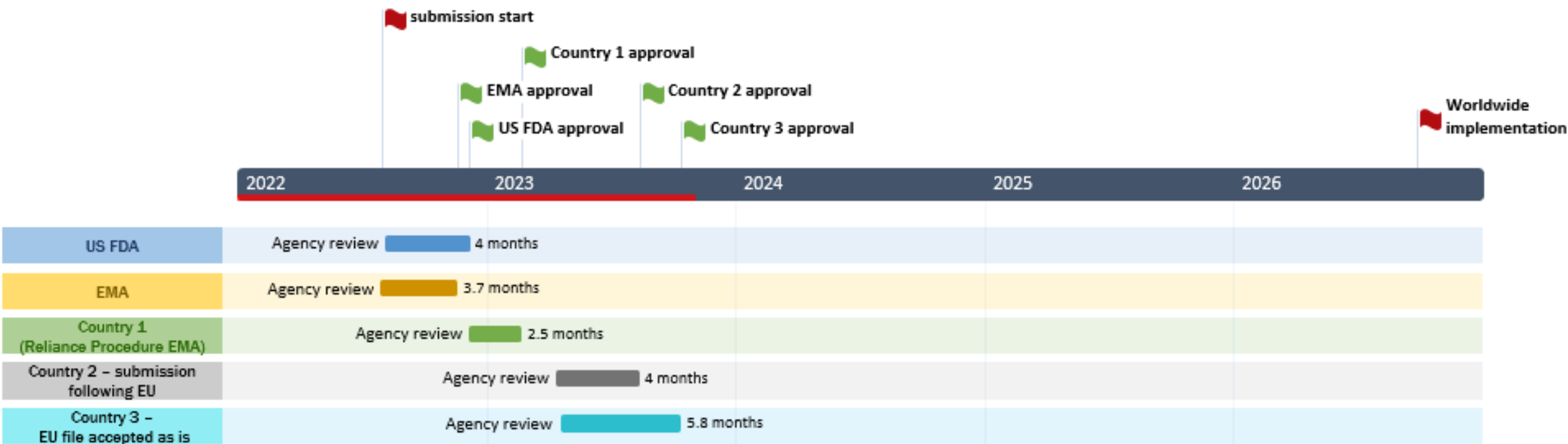
Sometimes redundant with M3 information and GMP related Translation required in several countries

Heterogeneity in Implementation Transition Periods

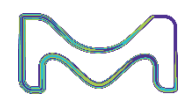
↳ **Direct Impact : Implementation Strategy Complexity and Slow Down Supply/Patient Access**



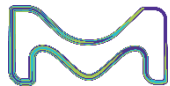
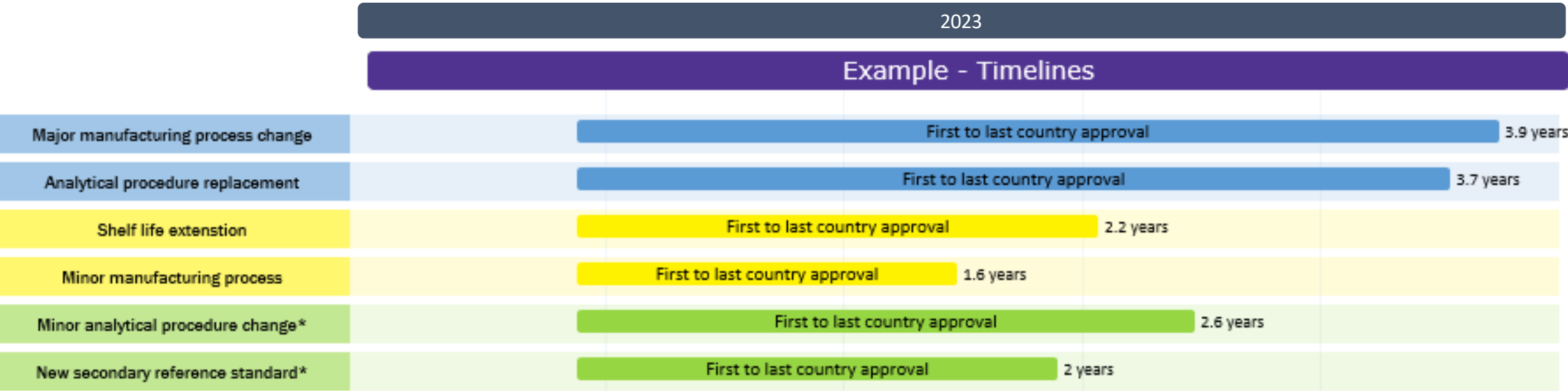
Post Approval Change Management – Examples



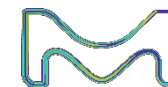
How to bring all countries in optimized timeframe to fasten worldwide implementation?



Post Approval Change Management – Examples



Post Approval Change Management – How Can Industry and Regulators Act Together ?



Post Approval Change Management – How Can Industry and Regulators Act Together ?



Challenges:

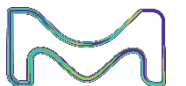
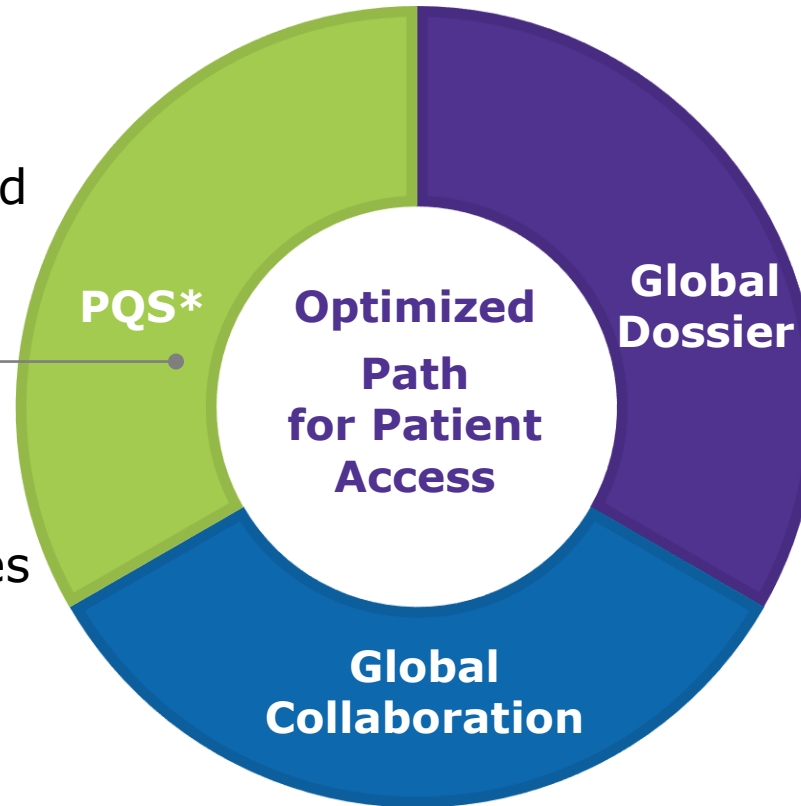
Changes Reportability Divergence /Country Specific Requirements /Review Time

PQS as major enabler- ICH Q12 toolbox

Framework for quality risk-based categorization for changes reporting

Established Conditions (EC) – binding information subject to reportability to health authorities (quality risk based reportability level)

PACMP : Post Approval Change Management Protocols



Post Approval Change Management – How Can Industry and Regulators Act Together ?



Challenges:

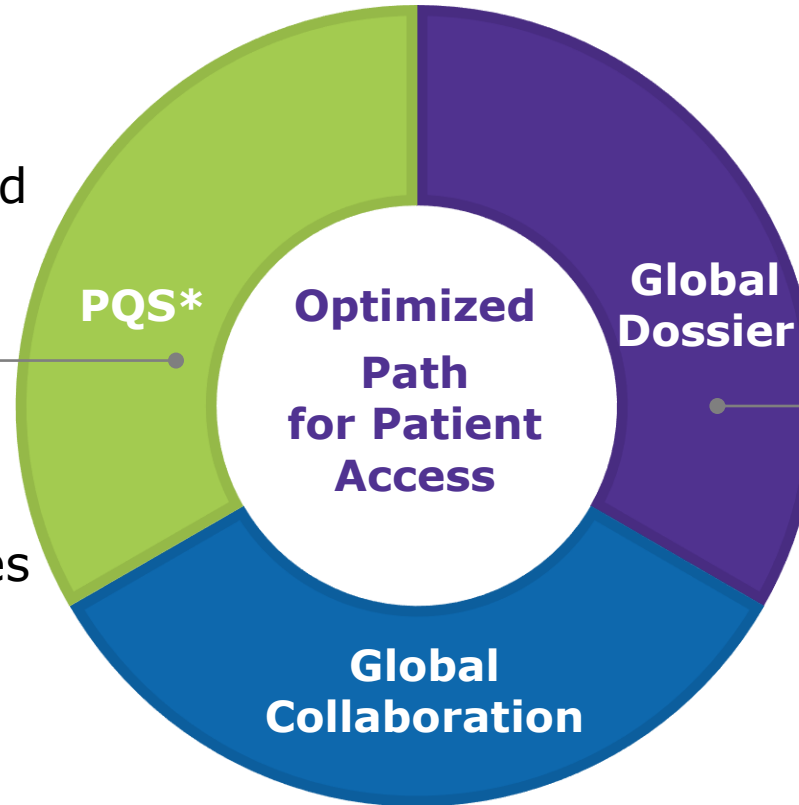
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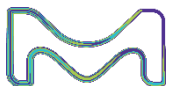


Single Dossier Worldwide as a Tool for Enhanced Collaboration

Harmonized content

Support for modernized regulatory AI abled processes

More GMP related documentation managed under PQS



Post Approval Change Management – How Can Industry and Regulators Act Together ?



Challenges:

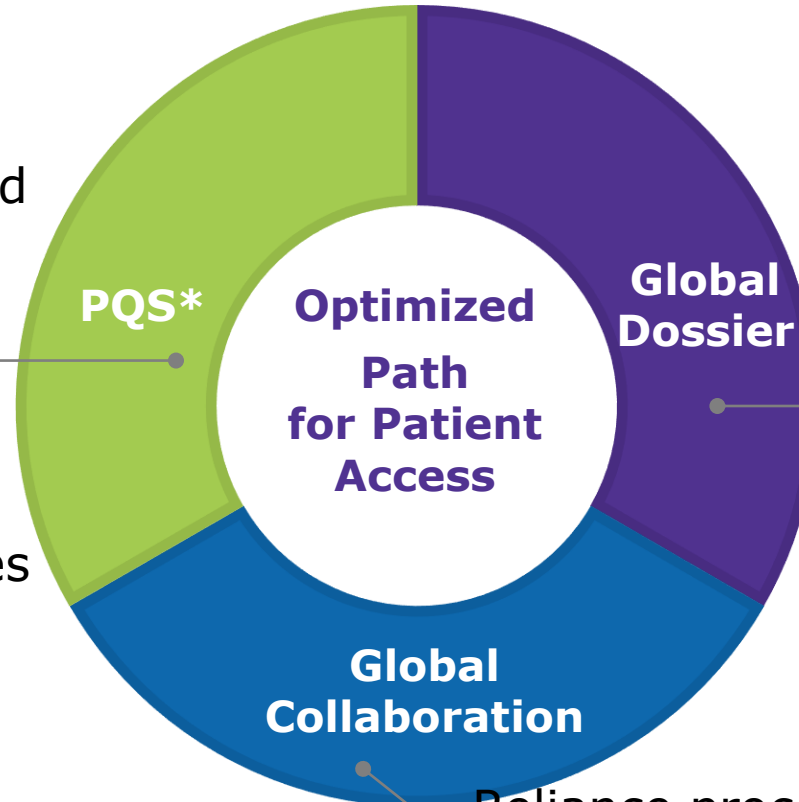
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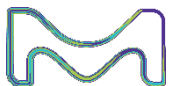
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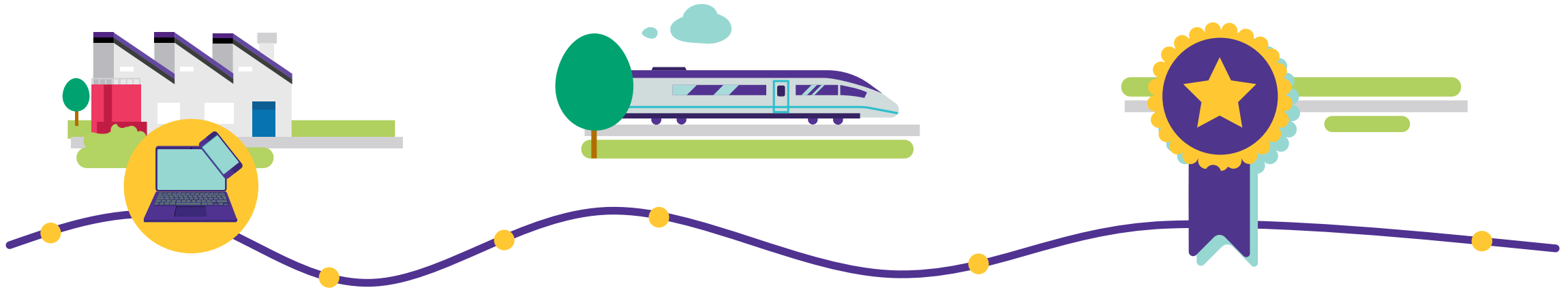
More GMP related documentation managed under PQS

Reliance processes
Regulators work sharing
Global opportunities for Health Authority/Industry dialog



Concluding Perspectives

Road to success



More Harmonization

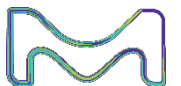
Same change, same data, same quality, same reportability

More Collaboration

Capitalize on worldwide resources – Reliance Pathways

Single Source of Truth

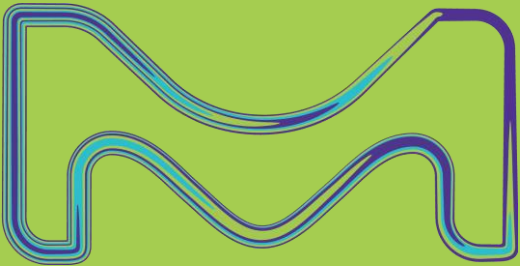
Cloud-based data sharing and assessments (e.g. “Dynamic Regulatory Assessment”)



The businesses of Merck KGaA, Darmstadt, Germany operate as
EMD Serono, MilliporeSigma and EMD Electronics in the U.S. and Canada.

Thank you

any questions ?



EMD
SERONO

Millipore
SIGMA

EMD
ELECTRONICS