

Post-approval Change Classifier

List your planned CMC changes and get the suggested US reporting category and EU variation type for each, with the CTD sections to update and the data to provide, taking ICH Q12 established conditions and approved protocols into account.

WRITES	PRODUCT TYPE	GUIDANCE IT FOLLOWS	TIME TO LEARN
Report	Small molecule and biologics	ICH Q12; 21 CFR 314.70 and 601.12; FDA Changes to an Approved NDA or ANDA (2004); FDA CMC Changes to an Approved Application: Certain Biological Products (2021); SUPAC-IR/MR; Commission Regulation (EC) No 1234/2008 and the Variations Classification Guideline (2013/C 223/01); ICH Q5E	About 20 minutes with the example

Open the tool at <https://app.cmcfy.com/app/lifecycle-changes.html>. This guide is also online at <https://cmcfy.com/guides/lifecycle-changes.html>

1. What this module does

For each change you give a short description, a type code, its impact, and whether it is covered by an approved protocol (PACMP) or is an established condition. The tool suggests the US category (annual report, CBE-0, CBE-30 or prior approval supplement under 21 CFR 314.70 or 601.12) and the EU variation type (IA, IA_IN, IB or II, with the classification code from the Variations Guidelines).

It lists the CTD sections to update and the supporting data each change needs, and writes the summary of changes for the cover letter.

What you get

- A Word or PDF report: Post-approval change classification, with the cover letter text.

2. Before you start

Have these ready. You can still start with the example data and replace it piece by piece.

- The approved application type (NDA or ANDA, or BLA) and product class.
- Each planned change with its type, impact (minor, moderate, major), PACMP status, established condition status and, for batch size changes, the factor.
- A note of the data you have: comparability, comparative dissolution, stability.

Your data stays on your computer. The bar under the title counts every network request the page makes; it stays at 0 because your data never leaves your computer. [Download offline](#) [copy](#) saves a single file that opens from your own computer with all network access blocked, for air-gapped PCs.

3. Step by step with the example

Open the tool at app.cmcfy.com/app/lifecycle-changes.html. The example is loaded when the page opens, so every panel already has realistic data. Follow the steps to see how it works, then replace the example with your own data.

1 Describe the product and application

Enter the product, choose the region, the US application type and the product class (non-sterile solid, liquid or semi-solid, sterile, biological).

CMCfy | Post-approval Change Classifier | Projects | All modules | Training | Security

Runs entirely on this device | **Training guide** | Protocol builder

PROJECTS Keep this work in a project, with version history and your company logo on every report. Choose projects folder Keep in this browser

- Network requests since load: 0**
Counted live by your browser. Your data never leaves this device.
- Works offline**
Everything the tool needs is inside this page.
- Locked offline copy**
Save a single file that opens from your own computer with all network access blocked.

Report Save project Open project Start blank Load example

List your planned CMC changes. Each one is given a suggested US reporting category (annual report, CBE-0, CBE-30, prior approval supplement) and EU variation type (IA, IA_IN, IB, II), with the CTD sections to update and the data to provide. Established conditions and approved protocols (ICH Q12) are taken into account.

Guidance: ICH Q12; 21 CFR 314.70 and 601.12; FDA Changes to an Approved NDA or ANDA (2004); FDA CMC Changes to an Approved Application: Certain Biological Products (2021); SUPAC-IR/MR; Commission Regulation (EC) No 1234/2008 and the Variations Classification Guideline (2013/C 223/01); ICH Q5E

1 · PRODUCT AND APPLICATION

Product

CMX-101 Tablets, 50 mg (NDA 212345; EU MA via DCP)

Submission region

US: FDA (NDA, ANDA, BL)

US application type

NDA or ANDA (21 CFR 31)

Product class

Non-sterile solid oral

RESULT

6 changes · highest: CBE-30 supplement

No change needs prior approval.

US FILINGS	EU VARIATIONS	CHANGES
CBE-30 supplement, Annual report, Managed in PQS	—	6

2 · PLANNED CHANGES

SUGGESTED CLASSIFICATION

CHANGE	TYPE	US	SECTIONS TO UPDATE
--------	------	----	--------------------

2 List the changes

One row per change. The **Type** is a code such as site_dp, batch, process, spec_tighten or method; the panel note lists them all. Say whether a PACMP covers the change and whether it is an established condition.

3 Read the classification

The headline gives the highest filing: "6 changes · highest: CBE-30 supplement. No change needs prior approval." The table shows each change with its US category, EU type, the sections to update and the data needed.

SUGGESTED CLASSIFICATION

CHANGE	TYPE	US	SECTIONS TO UPDATE
Add Site B (Raleigh) for drug product manufacture; same equipment and process	New or additional drug product manufacturing site	CBE-30 supplement	3.2.P.3.1, 3.2.P.3.3, 3.2.P.3.5, 3.2.P.5.4, 3.2.P.8.2, 3.2.R (executed batch records)
Increase batch size from 150 000 to 600 000 tablets	Batch size change	Annual report	3.2.P.3.2, 3.2.P.3.5, 3.2.P.5.4, 3.2.P.8.2
Tighten the dissolution criterion from Q = 75% to Q = 80% at 30 min	Tightened acceptance criterion	Annual report	3.2.P.5.1, 3.2.P.5.6
Replace the assay HPLC method with a UHPLC method (equivalent)	Analytical procedure change (equivalent or better)	Annual report	3.2.P.5.2, 3.2.P.5.3
Extend shelf life from 24 to 36 months with real-time data	Shelf-life extension	Annual report	3.2.P.8.1, 3.2.P.8.3
Change granulation end-point from fixed time to impeller power	Manufacturing process change	Managed in PQS *	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 (executed batch records)

Suggested classification of each change.

4

Resolve alerts and download

Alerts flag missing batch size factors, changes marked as not an established condition despite a major impact, and missing comparability, dissolution or stability data. Then preview and download the report.

Preview and review before download

Close

Review

Checked on this device: gaps in the data, gaps in the report against ICH and regional expectations, and differences from the protocol.

No open gaps

No open gaps: the data, the report and the protocol (if given) match every rule checked, or you accepted the rest. Read the review before you sign.

Compare with the protocol

Load or paste the approved protocol. Every requirement and acceptance criterion in it is looked for in the report.

Paste the protocol text here, or load the file.

Load protocol file Compare

AI review against guidance

AI reads the report, the protocol and the data against the ICH, FDA or EMA requirements for these sections, and lists gaps with the guideline it applies, protocol and data mismatches, and how to fix them. You see exactly what is sent before anything leaves this device. Results and pass/fail are not changed.

Run AI review

Post-approval change classification

CMX-101 Tablets, 50 mg (NDA 212345; EU MA via DCP) · US (FDA)

This submission concerns CMX-101 Tablets, 50 mg (NDA 212345; EU MA via DCP). 6 chemistry, manufacturing and controls changes are described below.

1. Add Site B (Raleigh) for drug product manufacture; same equipment and process. US: CBE-30 supplement (FDA Changes to an Approved NDA or ANDA (2004) VI). Updated sections: 3.2.P.3.1, 3.2.P.3.3, 3.2.P.3.5, 3.2.P.5.4, 3.2.P.8.2, 3.2.R (executed batch records).
2. Increase batch size from 150 000 to 600 000 tablets. US: Annual report (SUPAC-IR/MR level 1–2). Updated sections: 3.2.P.3.2, 3.2.P.3.5, 3.2.P.5.4, 3.2.P.8.2.
3. Tighten the dissolution criterion from Q = 75% to Q = 80% at 30 min. US: Annual report (21 CFR 314.70(d)). Updated sections: 3.2.P.5.1, 3.2.P.5.6.
4. Replace the assay HPLC method with a UHPLC method (equivalent). US: Annual report (FDA 2004 guidance VIII). Updated sections: 3.2.P.5.2, 3.2.P.5.3.
5. Extend shelf life from 24 to 36 months with real-time data. US: Annual report (21 CFR 314.70(d)(vi)). Updated sections: 3.2.P.8.1, 3.2.P.8.3.
6. Change granulation end-point from fixed time to impeller power. US: Managed in PQS (21 CFR 314.70); Not an established condition: managed in the PQS (ICH Q12).. Updated sections: 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 (executed batch records).

Supporting data. Three registration batches from Site B with comparative dissolution profiles (f2 > 50) and 6 months accelerated stability; method validation and equivalence report for the UHPLC method; real-time stability to 36 months on three batches.

Change	US category	Sections
Add Site B (Raleigh) for drug product manufacture; same equipment and process	CBE-30 supplement (FDA Changes to an Approved NDA or ANDA (2004) VI)	3.2.P.3.1, 3.2.P.3.3, 3.2.P.3.5, 3.2.P.5.4, 3.2.P.8.2, 3.2.R (executed batch records)
Increase batch size from 150 000 to 600 000 tablets	Annual report (SUPAC-IR/MR level 1–2)	3.2.P.3.2, 3.2.P.3.5, 3.2.P.5.4, 3.2.P.8.2

Download Word (.docx) Download PDF

4. Field reference

Every input in the tool, panel by panel. Tables accept rows pasted straight from Excel, comma-separated text, or a loaded file; check the columns after loading a file. Fields marked “when it applies” appear only for the choices that need them.

1 · Product and application

FIELD	WHAT TO ENTER
Product	Type it in.
Submission region	Choose one: US: FDA (NDA, ANDA, BLA, IND); EU: EMA and national agencies (MAA); Both US and EU.
US application type	Choose one: NDA or ANDA (21 CFR 314.70); BLA (21 CFR 601.12).
Product class	Choose one: Non-sterile solid oral; Non-sterile liquid or semi-solid; Sterile product; Biological product.

2 · Planned changes

Type is one of: site_dp, site_ds, site_test, site_pack, batch, process, equipment, formulation, spec_tighten, spec_add, spec_widen, spec_delete, method, method_less, shelf_ext, shelf_red, ccs, supplier_exc,

CMCfy training guide · Post-approval Change Classifier

Page 5 of 8

supplier_sm. A plain description also works.

FIELD	WHAT TO ENTER
Changes	Type codes are listed in the panel note, for example site_dp, batch, process, spec_tighten, spec_widen, method. A table. Columns: Change Type Impact (minor / moderate / major) Approved protocol or PACMP (yes/no) Established condition (yes/no/not defined) Batch size factor (x). Paste rows from Excel, type comma-separated rows, or press Load file (Excel, CSV, Word, PDF or a scan).
Data available to support the changes	Type or paste text.

5. Checks and alerts

Calculations and pass/fail outcomes always come from fixed rules, never from AI. The tool checks:

- Each change is read into a type; anything uncertain is noted ("read as").
- Batch size factor given for batch size changes.
- A change marked as not an established condition but with a moderate or major impact is flagged; established conditions not defined are noted.
- Comparability data, comparative dissolution and stability data mentioned where the change needs them.
- Changes that need prior approval are flagged; several changes can be grouped (EU worksharing or grouping, US combined supplements).

How to resolve alerts

- **Critical** alerts block the download and must be fixed in the data. A failing result can instead be linked to an investigation: type the investigation reference and outcome and press [Record](#).
- **Major** alerts block the download until you fix them or type a justification and press [Accept justification](#).
- **Minor** alerts do not block anything. They are listed in the documents so the reviewer sees them.
- Some alerts have an [Apply fix](#) button that makes the change for you. [Reopen](#) undoes a justification.

Narratives

This module writes: Summary of changes (cover letter text). Each narrative is written by fixed rules from your data. You can edit it in the box. [Rewrite with AI](#) (where your plan includes AI) rewrites it in

regulatory style; every number in the text is checked against your data, and a number that does not match is flagged under the box and blocks the download until you correct it. [Reset to rule-based text](#) brings back the original.

6. Preview, gap review and download

1. Press [Preview](#) next to a section, or [Preview and download all](#). The document opens in a preview window, exactly as the Word file will read.
2. The left side lists the review, run on your device: **gaps in the data** (missing values, open alerts), **gaps in the report** (missing content the guidance expects, placeholders such as [site] or TBD left in the text) and, if you load the approved protocol under [Compare with the protocol](#), **differences from the protocol** (requirements, criteria, batches or time points it plans that the report does not show).
3. Click a finding to jump to the place in the preview. Fix it in the tool, then preview again.
4. Optional [AI review](#): a second read for contradictions, claims without data and vague wording. The report text is sent to Claude only when you press it, and only where your plan includes AI. Check every AI finding; AI can be wrong.
5. Press [Download Word \(.docx\)](#) or [Download PDF](#). With several documents open, [All as Word \(.zip\)](#) and [All as PDF \(.zip\)](#) download the set. The download buttons stay disabled while a blocking alert is open; the preview still works.

Documents this module produces

SECTION	DOCUMENT
Report	Post-approval change classification, with the summary of changes for the cover letter

Use [Save project](#) to keep your work as a file on your computer, and [Open project](#) to continue later. [Start blank](#) clears every field; [Load example](#) brings the example back. Nothing is stored on CMCfy servers.

7. US and EU submissions

US mode applies 21 CFR 314.70 (NDA and ANDA) or 601.12 (BLA) and FDA guidance on changes to an approved application. EU mode applies the Variations Regulation and the classification guidelines (2013/C 223/01), giving the type and the condition code. ICH Q12 established conditions and PACMPs can lower the category in both. These are suggestions: confirm the category with your regulatory team or the agency when in doubt.

8. Working with other modules

- Write the updated sections with the module that covers them, for example the Process & Controls Writer for a new site or the Specification Builder for a tightened limit.
- Stability support for the change comes from the Stability Studio.

9. Common pitfalls

- Describing a change too vaguely for the type to be read.
- Marking everything as minor impact: the category depends on the impact you state.
- Forgetting that a PACMP must be approved before it lowers the category.
- Not listing the data you have, so every data alert stays open.

10. Practice exercises

Each exercise starts from the example (press [Load example](#) to reset). We run these on every update of this guide, so the result you see should match.

1. **Widen a specification instead of tightening it**

In the changes table, change the type of the dissolution change from spec_tighten to spec_widen.

EXPECTED RESULT

The headline says the highest filing is now a prior approval supplement.

2. **Classify for the EU**

Set [Submission region](#) to EU.

EXPECTED RESULT

The facts now show the EU variation types for the changes.

Guide updated 28 October 2026 for the current version of the tool. CMCfy drafts are for review by a qualified person before use in a submission.