1/01/2024

Application Entry and Support Team
Prescription Medicines Authorisation Branch
Therapeutic Goods Administration
PO Box 100
Woden ACT 2606
Australia

Submission details

Sponsor (Applicant)	Alpha Consulting Pty Ltd (Client ID: 99999) acting on behalf of Bravo Pharma Pty Ltd
Regulatory affairs contact and details	John Smith, Regulatory Affairs consultant P: 02 9999 9999 E: john.smith@alphaconsulting.com.au; reg.affairs@alphaconsulting.com.au
Drug substance name(s)	dabigatran etexilate (as mesilate)
Application number	PM-2024-12345-1-3
eSubmission identifier	e009999
Sequence number	0003
Related sequence	NA

List of varied products

AUST R	Product name
1234567	DABIGATRAN BRAVO dabigatran etexilate (as mesilate) 75 mg capsule blister pack
1234568	DABIGATRAN BRAVO dabigatran etexilate (as mesilate) 110 mg capsule blister pack
1234569	DABIGATRAN BRAVO dabigatran etexilate (as mesilate) 150 mg capsule blister pack

Notes to evaluator

This submission PM-2024-12345-1-3 is related to pending submission PM-2024-12346-1-3, please evaluate these together.

Administrative information

This dossier is provided electronically in eCTD format and is approximately 100MB in size. It has been checked viruses using antivirus and found to be free of any malicious software.

Kind regards,

John Smith

John Smith
Regulatory Affairs consultant
Alpha Consulting Pty Ltd

Summary of changes:

Variation 1: DMCS: Drug product site of manufacture - changes to the site(s) of manufacture

Due to supply chain constraints and market demand, Bravo Pharma Pty Ltd wish to register an additional site for drug product manufacture of all three strengths of their dabigatran etexilate products. The new manufacturing site Advanced Pharmaceuticals Pty Ltd, Melbourne, Australia has an active manufacturing license (MI-99999999-LI-999999-9) and uses a slightly modified manufacturing process in comparison to the existing drug product manufacturing site, this is further described below.

Affected AUST Rs	Approved information	Proposed information	Justification for change and supporting documents
1234567 1234568 1234569	Drug product manufacturing sites: • Big Capsule Manufacturing Inc, Houston USA	Drug product manufacturing sites: • Big Capsule Manufacturing Inc, Houston USA • Advanced Pharmaceuticals Pty Ltd, Melbourne Australia	3.2.P.3.1 Manufacturer(s)

Due to differences in equipment and standard operating procedures, the new drug product manufacturing site, Advanced Pharmaceuticals Pty Ltd, uses a different encapsulation (step 5) and washing process (step 6). An updated manufacturing process and process validation data is provided along with stability data for 3 batches for up to 12 months at the long term (25°C/60% RH) condition.

Affected AUST Rs	Approved information	Proposed information	Justification for change and supporting documents
1234567 1234568 1234569	See Appendix 1	See Appendix 1	3.2.P.2.3 Manufacturing Process Development 3.2.P.3.3 Description of manufacturing Process and Process Controls 3.2.P.3.5 Process Validation and/or Evaluation 3.2.P.5.4 Batch analyses 3.2.P.8.1 Stability Summary and Conclusion 3.2.P.8.2 Post-approval Stability Protocol and Stability Commitment 3.2.P.8.3 Stability Data

Variation 2: DSCS: Drug product specifications - changes to specifications, including changes to test methods

Bravo Pharma Pty Ltd intends to widen the release limits for assay and impurities in the drug product specification for product manufactured at both the Big Capsule Manufacturing Inc and Advanced Pharmaceuticals Pty Ltd sites. There are no changes to the associated test methods. This change is to align the specification across the global market. Quality of the drug product is unaffected by these changes and a justification is provided in Module 3.2.P.5.6.

Affected AUST Rs	Approved information	Proposed information	Justification for change and supporting documents
1234567 1234568 1234569	Assay: 90.0% - 110.0% Related substances: Impurity A: NMT 0.5% Impurity B: NMT 0.2% Impurity C: NMT 0.4%	Assay: 90.0 - 115.0% Related substances: Impurity A: NMT 0.5% Impurity B: NMT 0.5% Impurity C: NMT 0.5%	3.2.P.5.1 Specification(s) 3.2.P.5.6 Justification of Specification(s)

Appendix 1

Full description of the drug product manufacturing process with any differences highlighted in a different text colour. This may include lists, flow diagrams or pictures to clearly articulate how the manufacturing process varies at the proposed site.