



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

GxP Inspections and related Inspectors Working Groups

IPA- INTRODUCTORY MEETING 1-2 February 2010

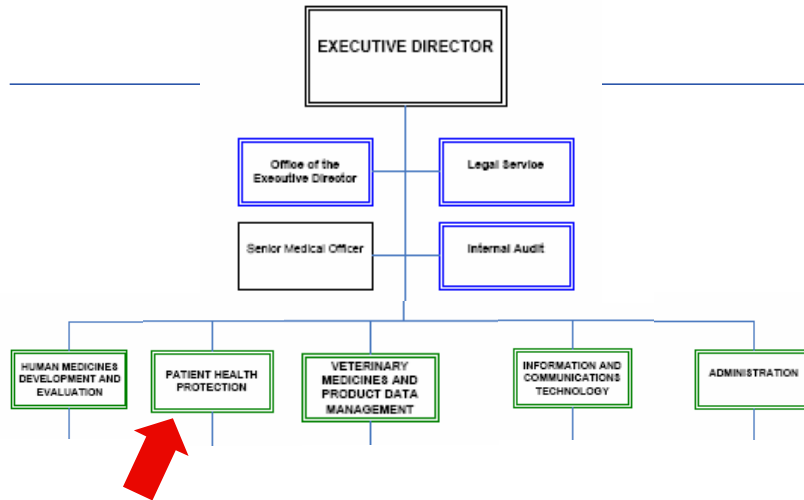
Presented by: Ana Rodriguez
Head Clinical and Non-Clinical Compliance

An agency of the European Union



- Compliance and Inspection Sector Activities
- Coordination of GxP Inspections
- GxP Inspectors Working Groups
- Where to find relevant information

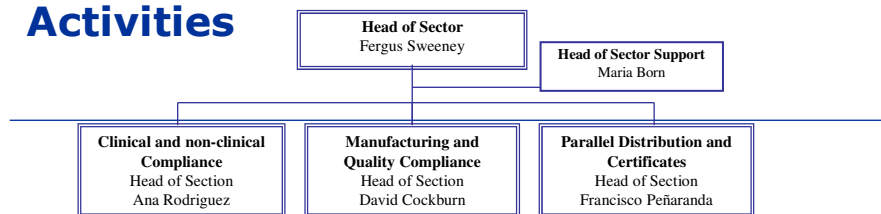
Patient Health Protection Unit



3 GXP Inspections and related IWGs

Compliance and Inspection Sector

Activities



- Coordination of GxP Inspections (GMP, GCP, GLP and PhV)
- Secretariat and Chair of GxP/PhV Inspectors Working Group meetings
- Secretariat joint CHMP/CVMP Quality Working Party (QWP)
- Mutual Recognition Agreements (MRAs)
- EMA Certification of Medicinal Products
- Parallel distribution
- Sampling and Testing (S&T)
- Product Defects i.e. Quality problems
- Business analyst for EudraCT and EudraGMPs

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Coordination of Inspections

- Regulation (EC) No 726/2004 Art. 57.1(i), coordinating the verification of compliance with the principles of good manufacturing practice, good laboratory practice, good clinical practice and the verification of compliance with pharmacovigilance obligations
- Specific framework and details of framework for inspections are set out in Directives for GCP, GLP, GMP and Pharmacovigilance
- EMA coordinates inspections requested in the context of Marketing Authorisation Applications to the Centralised procedure
- Inspections are carried out by the inspectors of the National Competent Authorities of the EU Member States
- These national inspections are conducted on behalf of the community
- Inspection results are shared by EU authorities

Coordination of Inspections

Purpose of an inspection

- To verify if the information provided in the marketing authorization application is reliable and accurate
- To verify and confirm compliance with Good Practices and/or Community law
- To review the performance of the quality management systems of the applicants – to gather experience
- To investigate reported deficiencies/non-compliance issues



Coordination of GMP Inspections

Pre-authorisation GMP inspections

- GMP compliance for sites outside the EU
- Production / process issues from assessment of application

Post-authorisation GMP inspections

- Checks on technology transfer and process validation
- Routine inspections for compliance with GMP

So far more than 900 inspections:

- USA 73%, Switzerland 6.4%, EU 7.7 %, Puerto Rico 6.7%, Japan 3%, Canada 1.6%, Israel 0.3%, South Africa 0.1%, Singapore 0.3%, Australia 0.1%, South Korea 0.3%, India 0.3%, Brazil 0.1%

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Coordination of GCP/PhV Inspections

Pre-authorisation GCP inspections

- Verification of GCP compliance and data validity in clinical trials submitted – triggered and routine

Post-authorisation GCP/PhV inspections

- Type II variations involving extension of indication
- Monitoring of compliance with specific obligations, follow-up measures or pharmacovigilance obligations

So far there have been more than 283 inspections requested

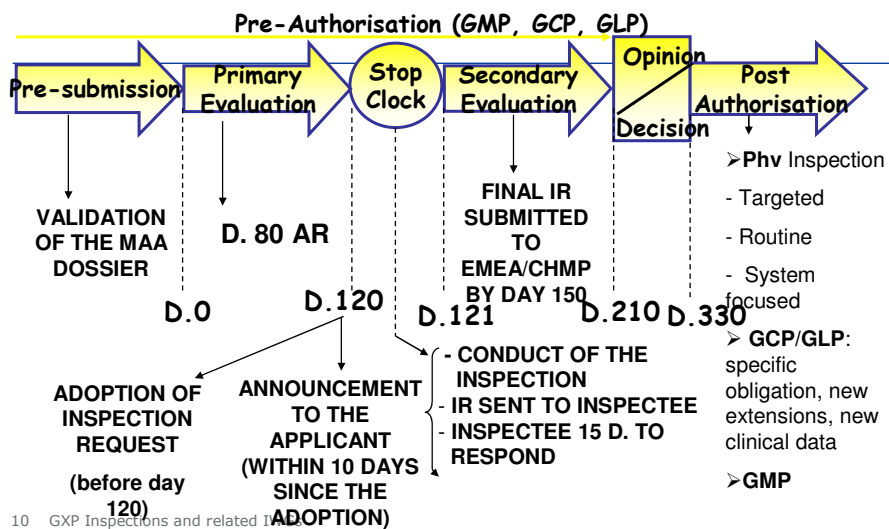
- 237 GCP (83.7%), 93.2% pre, 52.3% non-EU
- 46 PhV (16.3%); 100% post, 45.7% non-EU

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Coordination of GLP Inspections

- Co-ordination of the verification of compliance with the principles of GLP.
- Procedures adopted by the CHMP/CVMP in 2004
- So far there have been 2 GLP for 1 centralised on ad hoc basis and 10 GLP for 8 centralised using new GLP SOP.

CAP Inspections Overview and Timelines



Inspectors Working Groups



Meetings

- Quarterly meetings of GMP/GCP/PhV inspectors from EU at EMA
- Joint meetings with assessors or interested parties or other WP (1-2/year)
- Ad hoc group to establish procedures for GLP inspection request

Composition:

- Human and Veterinary medicinal products (GCP only Human)
- Delegates from 30 EU/EEA member states – agencies responsible for inspection H + V (GCP only Human)
- Observers from Croatia, FYRM, Turkey and Switzerland.

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Inspectors Working Groups

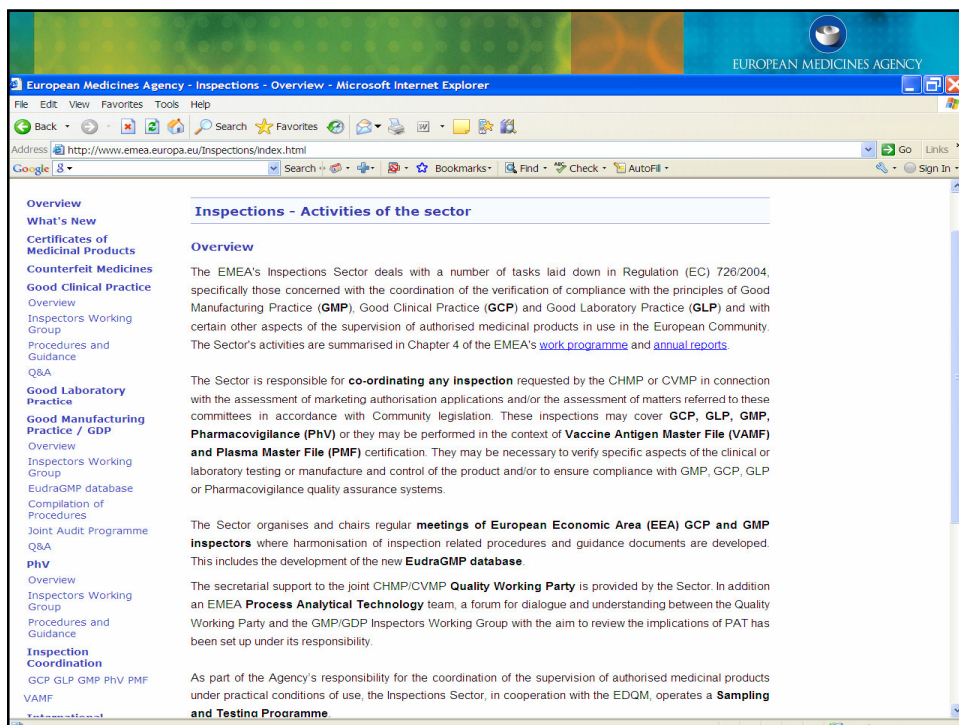
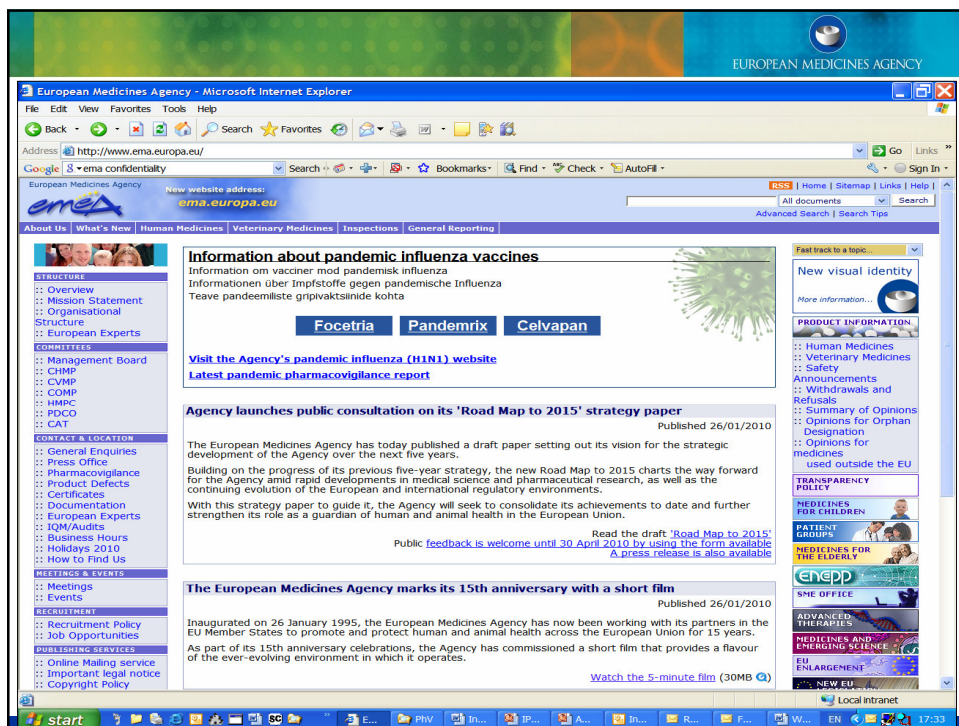
Objectives

- Harmonisation through practice
- Shared experience, discussion, conclusion
- Policy/guidelines/SOPs development
- Network of contact between inspectors
- Joint inspections on most Centralised inspections

Section on EMA website – work programme and annual report from the group:

<http://www.ema.europa.eu/Inspections/>

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Inspections - Good Clinical Practice

GCP Inspectors Working Group

The Sector draws on the expertise of member states' inspectorates for the fulfilment of many of its GCP related tasks. This is primarily achieved through the GCP Inspectors Working Group.

The GCP Inspectors Working Group focuses on harmonisation and co-ordination of GCP related activities at Community level. The Group activities are outlined in its work plan. It is involved in the preparation of new and revised guidance on GCP and community procedures relating to inspection. The Sector chairs and provides secretarial support to the GCP Inspectors Working Group. Members provide the expertise for the fulfillment of the group tasks and play a key role in the development of collaborative projects both within the community and externally.

The GCP Inspectors Working Group meets on a regular basis four times a year, at EMEA with representatives of the GCP inspectorates of the European Economic Area Member States, observers from candidate countries and Switzerland.

They support the co-ordination of the provision of GCP advice and provide a link with other groups such as CHMP, CVMP, EWP and PhVWP. These links include joint meetings with clinical and pharmacovigilance assessors and contributions to training of both inspectors and assessors. [The Mandate of the GCP Inspectors Working Group](#) describes the group's role and activities in more detail.

The GCP Inspectors maintain a dialogue with GMP Inspectors on areas of common interest in particular the interface between GMP for investigational medicinal products and GCP. A GCP / GMP subgroup assists in the interpretation of GMP in a number of specified areas (see workplan).

Documents of Interest:

- Annual report for GCP IWG: [2008](#)
- Workplan for Ad Hoc GCP IWG: [2008](#), [2009](#)
- [Draft Reflection Paper on Expectations for Electronic Source Documents](#) used in Clinical trials - Released for consultation until 31 April 2008.
- [Mandate of the GCP Inspectors Working Group](#)
- [Draft reflection Paper on advice to applicants, sponsors, CROs of Bioequivalence Studies](#) - Released for consultation until 31 March 2008. Many bioequivalence studies are well conducted, however, in recent years a number of cases, (including 3 referred to CHMP), have raised concerns amongst regulators leading to the preparation of this reflection paper.

See also: [Expectations for Electronic Source Documents](#)

Recommendations and guidance related to the implementation of GCP

These recommendations and guidance documents are for the attention of sponsors, CROs, clinical investigators and other parties involved in the conduct of clinical trials. They have been prepared by the GCP Inspectors Working Group in conjunction, where needed, with other Working Groups and Committees of the European Regulatory Network.

[Reflection Paper on advice to applicants / sponsors / CROs of Bioequivalence studies](#)  [Corrigendum](#)

Inspection procedures and guidance for GCP inspections conducted in the context of the Centralised Procedure

The GCP Inspectors Working Group has developed procedures for the coordination, preparation, conduct and reporting of GCP inspections carried out in the context of the Centralised Procedure.

These inspections are adopted by the CHMP and may be routine or may be triggered by issues arising during the assessment of the dossier or by other information such as previous inspection experience.

They are usually requested during the initial review of a Marketing Authorisation Application, but could arise post-authorisation (e.g. inspection of studies conducted or completed as part of the condition of a marketing authorisation, or because of concerns arising about the studies previously submitted).

INS-GCP-1 Procedure for coordinating GCP inspections requested by the EMEA Corr.	
INS-GCP-2 Procedure for preparing GCP inspections requested by the EMEA	
INS-GCP-3 Procedure for conducting GCP inspections requested by the EMEA	
INS-GCP-3 Annex I to Procedure for conducting GCP inspections requested by the EMEA- Investigator Site	
INS-GCP-3 Annex II to Procedure for conducting GCP inspection requested by the EMEA- Clinical Laboratories	
INS-GCP-3 Annex III to Procedure for conducting GCP inspection requested by the EMEA- Computer Systems Rev. 1	
INS-GCP-3 Annex IV to Procedure for conducting GCP inspections requested by the EMEA- Sponsor and CRO	
INS-GCP-3 Annex V to Procedure for conducting GCP inspections requested by the EMEA- Phase I Units	
INS-GCP-3 Annex VI to Procedure for conducting GCP inspections - File structure and archiving	
INS-GCP-3 Annex VII to Procedure for conducting GCP inspections requested by the EMEA: Bioanalytical part, Pharmacokinetic and Statistical analyses of Bioequivalence Trials	
INS-GCP-4 Procedure for reporting of GCP inspections requested by the EMEA	
Principal Documents taken into account for the preparation of procedures for the GCP inspections requested by the EMEA	


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Questions and Answers on GCP Matters

Q1. Can a sponsor prospectively approve deviations (so-called "protocol waivers") from the inclusion/exclusion criteria of the approved protocol without additional approval of the Ethics Committee and competent regulatory authority?

A1. Adherence to the protocol is a fundamental part of the conduct of a clinical study. Any significant change to the protocol should be submitted as an amendment to the competent regulatory authority and Ethics Committee. Significant changes to the protocol include any change in inclusion and exclusion criteria, addition or deletion of tests, dosing, duration of treatment etc (see the definition of a substantial amendment in the 'Detailed guidance for the request for authorisation of a clinical trial on a medicinal product for human use to the competent authorities, notification of substantial amendments and declaration of the end of the trial' published by the European Commission in Chapter I, Volume 10 of The Rules Governing Medicinal Products in the European Community). Deviations from the inclusion / exclusion criteria of the protocol might erode the scientific and ethical value of the protocol and its authorisation and might have an impact on the processes put in place for the care and safety of the study subjects.

Sponsors and investigators should not use systems of prospectively approving protocol deviations, in order to effectively widen the scope of a protocol. Protocol design should be appropriate to the populations required and if the protocol design is defective, the protocol should be amended.

The GCP does permit deviations from the protocol when necessary to eliminate immediate hazards to the subjects but this should not normally arise in the context of inclusion/exclusion criteria, since the subject is not yet fully included in the trial at that point in the process. GCP inspectors have observed a number of sponsors implementing systems where the investigator can contact the sponsor, usually the Medical Monitor, and request a prospective approval to deviate from the inclusion and/or exclusion criteria. The use of such systematic waiver systems in clinical trials is not considered to be appropriate and studies using such a system might be regarded as non-compliant with GCP.

Question and Answers on records of study subject data relating to clinical trials

Q1. What are the roles and requirements for the study subject record (medical record) and related source documents in the context of a clinical trial?

A1. Background: A variety of records is generated and maintained relating to the healthcare of clinical trial subjects (whether study subjects or healthy subjects). Some of these are general and relate to the general healthcare of the study subject before, during and after the trial. Others are specific to the trial. A clinical trial as a scientific undertaking requires careful record-keeping to ensure that


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European Medicines Agency - Inspections - Good Manufacturing Practice - Microsoft Internet Explorer

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Inspectors Working Group

EudraGMP database

Compilation of Procedures

Joint Audit Programme

Q&A

PhV

Overview

Inspectors Working Group

Procedures and Guidance

Inspection

Inspections - Good Manufacturing Practice

Good Manufacturing Practice - Overview

Good Manufacturing Practice (GMP) is defined as "That part of Quality Assurance which ensures that products are consistently produced and controlled to the quality standards appropriate to their intended use." The principles and guidelines for GMP are stated in two Directives; Directive 2003/94/EC for medicinal products and investigational medicinal products for human use and Directive 91/412/EEC concerning veterinary medicinal products. Compliance with these principles and guidelines is mandatory within the European Economic Area. Detailed guidelines in the form of the Guide to Good Manufacturing Practice provide interpretation of the principles and guidelines and these in turn are supplemented by a series of annexes which modify or augment the detailed guidelines for certain types of product, or provide more specific guidance on a particular topic. They are developed by the GMP inspection services group and are published as Volume 4 of EudraLex by the European Commission.

Information on GMP inspections co-ordinated by EMEA can be found by following the [GMP Inspection Coordination link](#).

Good Distribution Practice - Overview

Good Manufacturing Practice ensures that products released for distribution are of the appropriate quality. This level of quality should be maintained throughout the distribution network so that authorised medicinal products are distributed to retail pharmacists and other persons entitled to sell medicinal products to the general public without any alteration of their properties. To maintain the quality of the products and the quality of the service offered by wholesalers, Directive 92/25/EEC provides that wholesalers must comply with the principles and guidelines of Good Distribution Practice (GDP).

Local Intranet

European Medicines Agency - Inspections - Good Manufacturing Practice - GMP/GDP Inspectors Work - Microsoft Internet Explorer

Address: <http://www.ema.europa.eu/inspections/GMPinspmgt.html>

Group: representatives of the GMP inspectorates of the European Economic Area Member States, a representative from the European Commission (DG Enterprise and Industry) and observers from EDQM, the inspectorates of the countries accessing to the EU and MRA partner countries. The Sector provides the chair and secretarial support for these meetings.

Good Laboratory Practice

Good Manufacturing Practice / GDP

Overview

Inspectors Working Group

EudraGMP database

Compilation of Procedures

Joint Audit Programme

Q&A

PhV

Overview

Inspectors Working Group

Procedures and Guidance

Inspection Coordination

GCP GLP GMP PhV PMF

VAMP

International Cooperation

MRAs AU CA CH JP NZ

US

FDA

ICH-VICH

Process Analytical Technology

Overview

Q&A

The meetings consider new and revised GMP-related guidance, normally developed by drafting groups, work related to Mutual Recognition Agreements, how new legislation impacts GMP inspection activity and harmonisation of GMP inspections. It is also where community-wide procedures relating to GMP inspections, known as the Compilation of Procedures are developed. The group interacts with other bodies e.g. PIC/S and EDQM. GMP related issues concerning centrally authorised products and GMP inspections co-ordinated by EMEA in connection with these, are also considered at the meetings. The Group's work plan is published annually.

The functions of inspection and assessment have always been complementary activities and there is increasing awareness of the importance of interactions between GMP inspectors and assessors. EMEA therefore arranges a joint meeting between this group and Quality Working Party at least once a year. The group contributes to the EMEA PAT team, which is made up of representatives of Quality Working Party, Biologics Working Party as well as the GMP/GDP Working group.

GMP inspectors maintain a dialogue with GCP Inspectors on areas of common interest in particular the interface between GMP for investigational medicinal products and GCP. A GCP / GMP subgroup assists in the interpretation of GMP in a number of specified areas.

The group aims to meet with its interested parties, representatives of European industry associations and relevant professional associations, at least once a year.

Documents of Interest:

- Mandate of GMP/GDP Inspectors Working Group *corrected*
- Work plan 2010 for GMP/GDP Inspectors Working Group *new* Updated on 12 January 2010

Information on GMP Guidance can be found on the [main GMP home page](#)

European Medicines Agency - Inspections - Good Manufacturing Practice - Compilation of Communit - Microsoft Internet Explorer

Address: <http://www.ema.europa.eu/inspections/GMPCompproc.html>

European Medicines Agency

Inspections - Good Manufacturing Practice

Compilation of Community Procedures on Inspections and Exchange of Information

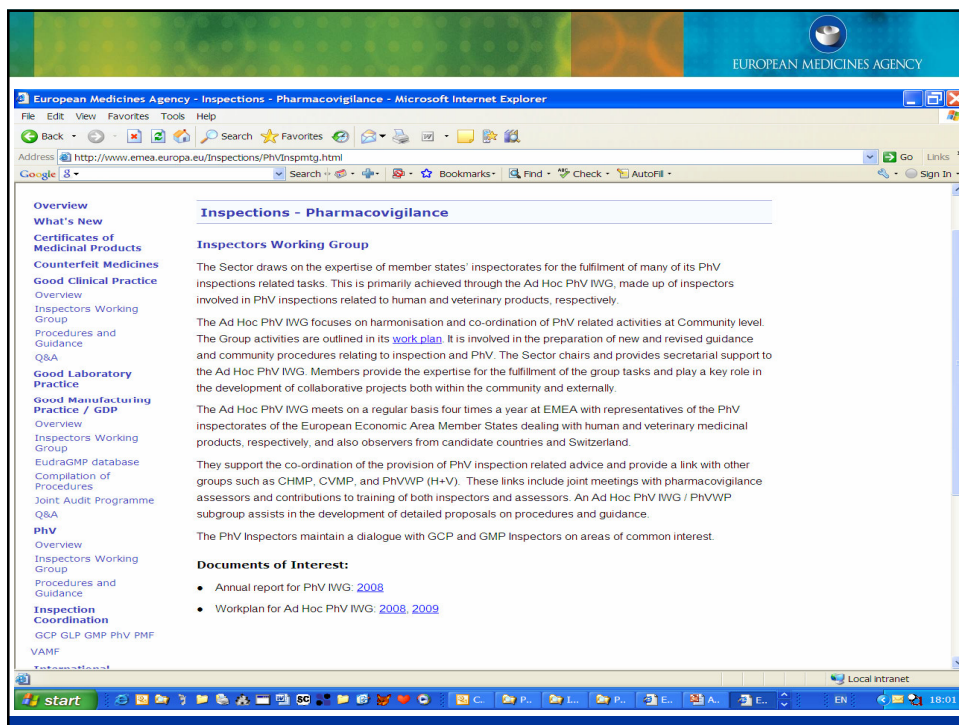
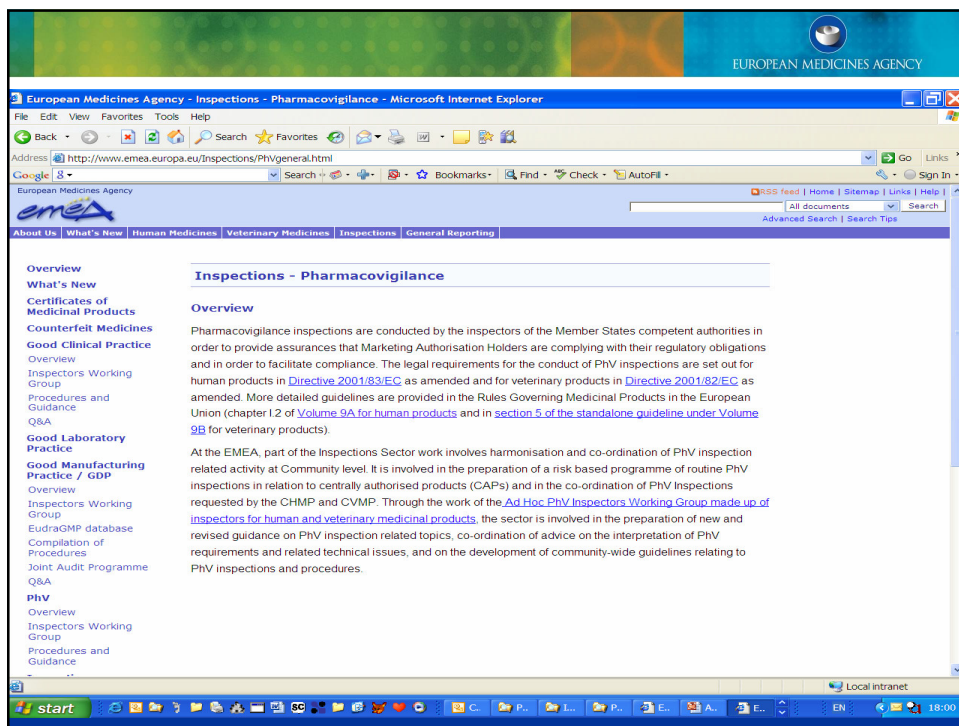
The European Medicines Agency is responsible for maintaining and publishing the Compilation of Procedures on behalf of the European Commission. The Compilation of Procedures is a collection of GMP inspection-related procedures and forms agreed by the GMP inspectorates of all the Member States and designed to facilitate administrative collaboration, harmonisation of inspections and exchange of inspection-related information. Article 3 of the GMP Directive, 2003/94/EC, requires Member States to take account of these procedures, and they are used as the basis for standard operating procedures of the quality systems established within the inspectorates themselves.

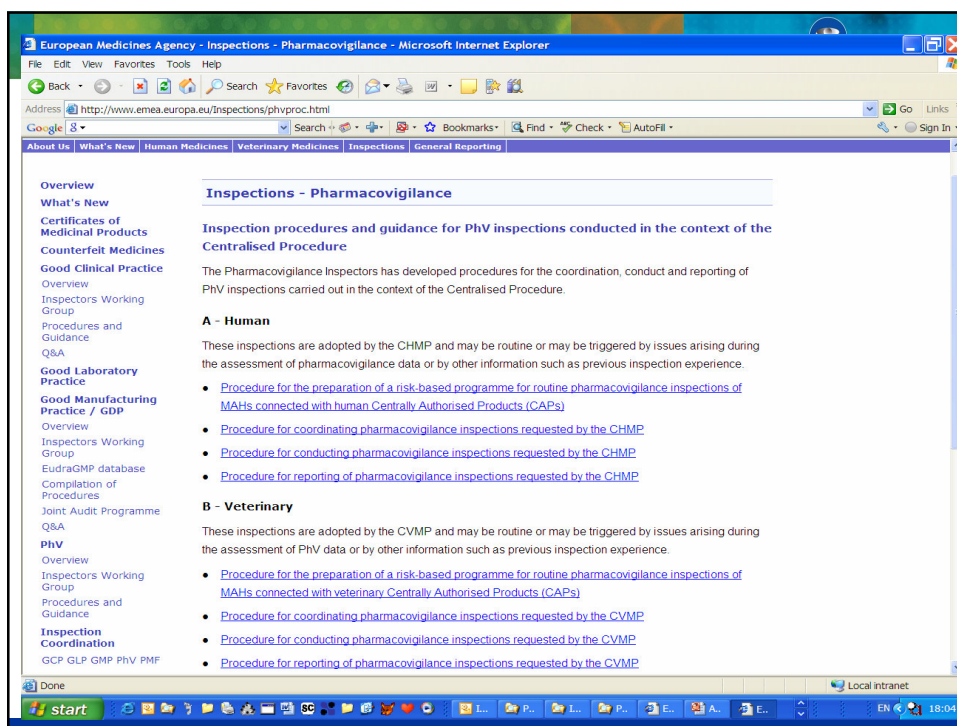
[Zip file](#) containing all the documents in the Compilation (file size = 1.4 MB)

Individual documents can be downloaded using the links below:

Table of Contents and Introduction:	
Quality Systems Framework for GMP Inspectorates	
Procedures related to Rapid Alerts:	
Handling of reports of suspected quality defects in medicinal products	
Procedure for Handling Rapid Alerts and Recalls Arising from Quality Defects	
Procedure for Handling Rapid Alerts and Recalls Arising from Quality Defects <i>pending adoption</i>	
Rapid Alert Notification form	
Rapid Alert Follow up form	
Procedures related to GMP Inspections:	
Procedure for dealing with serious GMP non-compliance or voiding/suspension of CEPS thus requiring coordinated administrative action <i>pending adoption</i>	
Conduct of Inspections of Pharmaceutical Manufacturers	

Outline of a Procedure for Co-ordination the Inspection of the GMP status of





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EU Legislation - Eudralex

http://ec.europa.eu/enterprise/sectors/pharmaceuticals/documents/eudralex/index_en.htm

[Volume 1 - EU pharmaceutical legislation for medicinal products for human use](#)
[Volume 5 - EU pharmaceutical legislation for medicinal products for veterinary use](#)

The basic legislation is supported by a series of guidelines that are also published in the following volumes of "The rules governing medicinal products in the European Union":

[Volume 2 - Notice to applicants and regulatory guidelines for medicinal products for human use](#)
[Volume 3 - Scientific guidelines for medicinal products for human use](#)
[Volume 4 - Guidelines for good manufacturing practices for medicinal products for human and veterinary use](#)
[Volume 6 - Notice to applicants and regulatory guidelines for medicinal products for veterinary use](#)
[Volume 7 - Scientific guidelines for medicinal products for veterinary use](#)
[Volume 8 - Maximum residue limits](#)
[Volume 9 - Guidelines for pharmacovigilance for medicinal products for human and veterinary use](#)
[Volume 10 - Guidelines for clinical trial](#)

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Thank you for your attention!



Questions?