# GxP Inspections within the Centralised Procedure

Brendan Cuddy
Inspections Sector

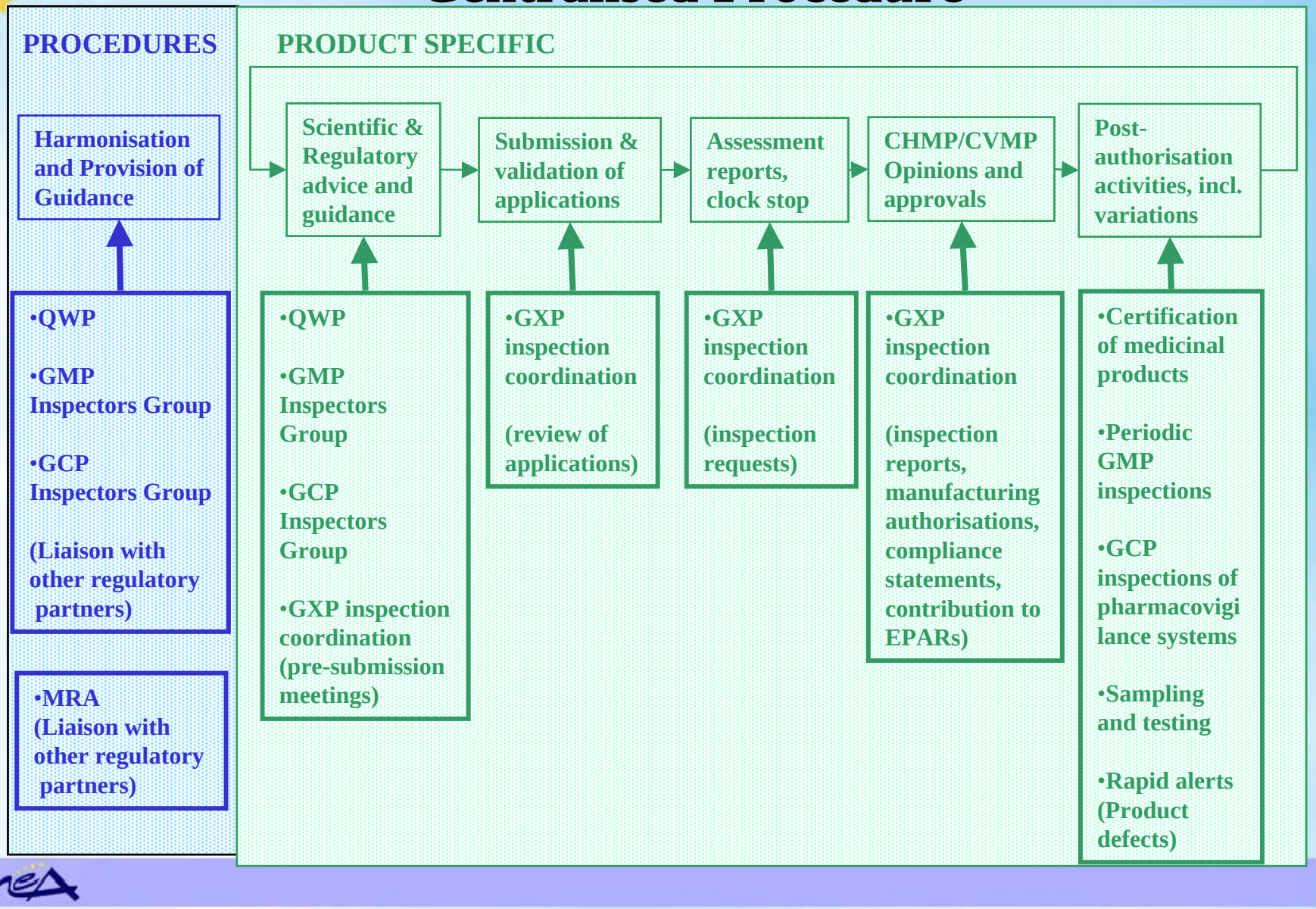
**2nd EMEA Workshop for Micro, Small and Medium-Sized Enterprises (SMEs)**

*"Focus on Quality"*

# Agenda

- Introduction to work of the Inspections Sector
- GxP Inspections within the centralised procedure
  - Regulatory framework for inspections
    - Legal basis for inspections
    - Timetable for inspections
- GMP Inspections information in the dossier & common dossier validation problems
- Post-authorisation Inspections
- GMP for IMP's

# Inspections' Contribution to Centralised Procedure



# Inspections Sector Activities

- Majority of Inspections Sector operations are related to applications submitted to the EMEA (centralised procedures, pre&post-authorisation and referrals)
- EMEA co-ordinates Inspection activities within the agreed timetable,
- There are no inspectors at the EMEA, we use the expertise of the EU Member States

# Co-ordination of Pre-authorisation: GMP Inspections

- in order to complete the assessment process.
- Legal basis: Article 8.2 (or 30.2 for vet medicinal products) Council Regulation 726/2004.
- Responsibility for carrying out inspections rests with the Supervisory Authority
  - Supervisory Authority, which is defined as the Competent Authority of the MS in which the product is either manufactured or imported within the EEA.

# COUNCIL REGULATION 726/2004 (CAP/EMEA)

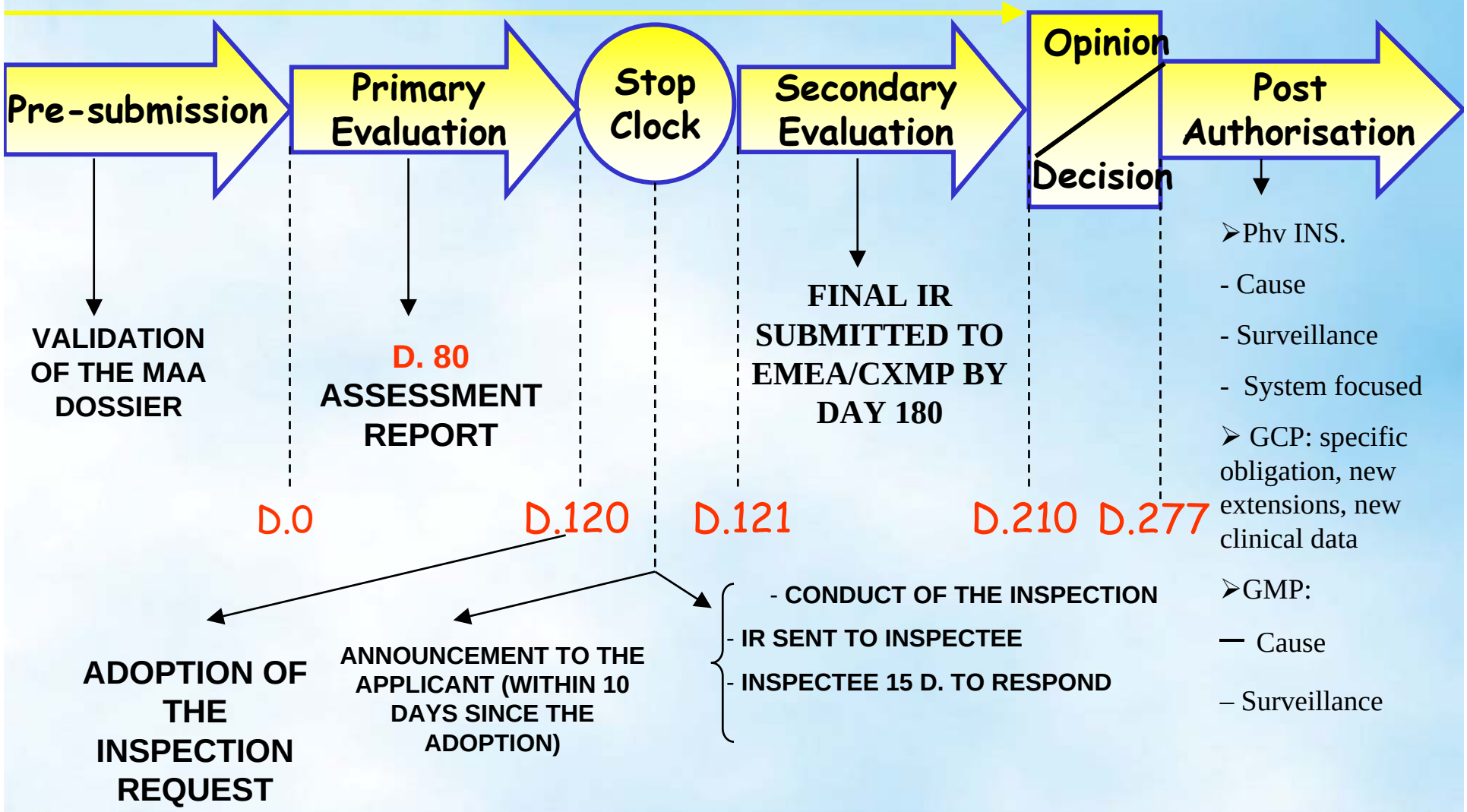
**ART 57...THE AGENCY SHALL UNDERTAKE THE FOLLOWING TASKS WITHIN ITS COMMITTEES:**

**i)** co-ordinating the verification of compliance with the principles of good manufacturing practice, good laboratory practice and good clinical practice and the verification of compliance with pharmacovigilance obligations

# Co-ordination of GMP Inspections

- **Type of inspections:**
  - **GMP**:
    - For sites located in third countries , where EU-GMP is unconfirmed (no satisfactory EU inspection in the last 2 years on same building, similar type of product and equipment.
  - **Product & Process:**
    - To assess Quality issues raised by Rapp/CoRapp during assessment of Part II of the application.
    - Can apply to all sites wherever they are located (EEA/Third countries)

# Timetable for Inspections



# Shorter timetables

- Some procedures have shorter timetables;
  - Generic Applications
  - Applications granted accelerated assessment
- If inspection requested during the assessment then there will be a clock stop and secondary evaluation phase

# Composition of Inspection Teams

- **Inspection team**:
  - Leading inspector(s)
  - Scientific experts appointed on the advice of the Rapporteur and / or Co-Rapporteur.
- **Number of inspectors:**
  - Normally two inspectors
  - Higher numbers may be justified.

# Fees

- Council Regulation 297/95 specifies fees payable for inspections
- Implementing rules for Council Regulation adopted by EMEA management Board set the level of the fees.
  - Inspection fee per site inspected, and sub-divided between EMEA and inspectorates;
  - For 3rd country inspections, travel expenses etc. are payable separately.

**DON'T FORGET TO APPLY FOR YOUR FEE REDUCTION**

# GMP Inspections Information in the Dossier

- Part 1A Application Form
- Annexes – manufacturing licences, GMP Certificates, QP Declaration.
- Module 3.

# Common Dossier Validation Problems

- Manufacturing Authorisations
  - Site not licensed
  - Site has IMP Licence
  - Licence does not include activities to be performed.
- Inconsistent manufacturing/testing site information throughout dossier
- QP Declarations
  - QP cannot provide declaration.
  - Declaration does not cover all drug substance manufacturing sites
  - Declaration not signed by QP or by all QP's
- Testing upon importation

# Post-Authorisation GMP Inspections

- Co-ordination of GMP inspections during post authorisation procedures
  - Variations, Line extension
- Co-ordination of for cause inspections
  - GMP Problems
  - Quality Defects

# Post-Authorisation GMP Inspections

- Co-ordination of routine GMP inspections
  - The EMEA prepares a program of re-inspections in Third Countries (TC) for centralised products.
  - Re-inspections are also adopted by the CxMP.
  - MSs may provide feedback on the program (e.g. delegation, assistance from another MS, combination with national products).
  - Inspections are carried out at least every 2-3 years, unless a more frequent basis is recommended by the inspectors.

# GMP Inspections: IMPs

- Responsibility rests with Supervisory Authority
  - Routine inspections of sites of manufacturing authorisation holders (IMPs)
  - In response to CT Application (if needed)
  - In response to MA Application (if needed)
  - In 3rd countries (risk-based approach)
    - Import to a single point within the Community could simplify clinical trial authorisations as there would be only one Supervisory Authority
  - Other triggers e.g.:
    - Follow up of other GMP or GCP inspections
    - Complaints/quality defects/rapid alerts

# Contacting Inspections Sector

- For general questions concerning GMP: GMP@emea.europa.eu
- For questions concerning GMP inspections: GMPINS@emea.europa.eu
- For general questions concerning GCP: GCP@emea.europa.eu
- For general questions concerning GLP: GLP@emea.europa.eu
- To report a suspected product defect or recall: QDEFECT@emea.europa.eu
- Web :http://www.emea.europa.eu/Inspections/index.html

SME Workshop

# THANK YOU FOR YOUR ATTENTION