27 February 2020
EMA/CHMP/91871/2020

CHMP List of questions

To be addressed by the applicants and marketing authorisation holders for medicinal products which have been authorised or are pending approval based on clinical trials performed at Panexcell Clinical Laboratories Priv. Ltd

Referral under Article 31 of Directive 2001/83/EC

Procedure number: EMEA/H/A-31/1494

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Panexcell Clinical Laboratories Priv. Ltd., located in Navi Mumbai 400 701, India, was subject to a GCP inspection in October 2019 by the Austrian and German competent authorities where critical findings were identified that cast serious doubts on the reliability of the data of the study inspected.

The following critical observations were made during the inspection of a bioequivalence study:

- The reported PK profiles of several subjects were found to be exceptionally similar. From the verification done during inspection it is apparent that study samples could not have been mixed-up accidentally. The similarities of the profiles are of such extent that they cannot be explained and there are serious doubts whether the reported concentrations of the subjects do actually originate from these. Moreover, the confidence interval, which was >125% after the samples of the first 32 subjects were analysed showed a downwards trend and appeared to be only within the acceptance limit after the affected subject samples were analysed.
- During the inspection, study personnel intentionally documented the wrong room temperature in order to pretend that room temperature in the sample processing area was within the acceptance range.

The severity and the extent of the findings of the inspection raise serious concerns relating to the suitability of the quality management system at Panexcell Clinical Laboratories Priv. Ltd. and about the overall reliability of data generated by this CRO and submitted to support the marketing authorisation applications for medicinal products in the EU.

The marketing authorisation holders (MAHs) and applicants are invited to comment on the impact of the above on their marketing authorisation(s) or application(s). Demonstration of bioequivalence to the EU reference medicinal product (RMP) is a requirement of Article 10 of Directive 2001/83/EC, MAHs are therefore requested to provide evidence of bioequivalence (e.g. bioequivalence trials) with the EU reference medicinal product, in order to demonstrate a positive benefit-risk balance of the concerned medicinal products.