



## Work instructions

Title: Preparation of the annual GMP re-inspection programme		
Applies to: P-CI-MQC Section		
Status: <b>PUBLIC</b>		Document no.: WIN/INSP/2046
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### 1. Changes since last revision

New WIN.

### 2. Records

Electronic copies of the documents prepared are stored in DREAM under Cabinets/04. Inspections/4. GMP/Planning and reporting/GMP inspections coordination.

Emails circulated for the preparation and finalisation of the programme are copied in the GMPINS mailbox, which can be found in Outlook under Public Folders / All Public Folders / Compliance and Inspection / MQC / GMPINS.

#### ***Documents needed for this WIN***

- Template 1: Informing MAH about probable inspection request, saved in the X drive under: X:\Templates\Others\Compliance and Inspection\GMP\Inspection Coordination.

#### ***Related documents***

- Compilation of Community procedures on inspections and exchange of information: EMA Public website > Home > Regulatory > Human medicines/Veterinary medicines > Inspections > GMP/GDP compliance > Community procedures.
- SOP/EMA/0101 Conducting checks for conflicts of interest of Agency employees assigned duties relating to medicinal products for human or veterinary use.
- SOP/INSP/2048 Co-ordination of GMP/GDP inspections.



- WIN/INSP/2047 Inspection of quality control facilities located in 3<sup>rd</sup> countries.

### 3. Instructions

#### ***Abbreviations***

AS = Active Substance.

CAP = Centrally Authorised Product.

CxMP = Committee for Medicinal Product for Human/Veterinary use.

EEA = European Economic Area.

EU = European Union.

GDP = Good Distribution Practice.

GMP = Good Manufacturing Practice.

MA = Marketing Authorisation.

MAH = Marketing Authorisation Holder.

NCA = National Competent Authority.

P-CI-MQC = Manufacturing and Quality Compliance section, Compliance and Inspection sector, Patient Health Protection unit.

This WIN provides instructions for the preparation of the annual Good Manufacturing Practice (GMP) re-inspection programme for the year X. Such programme will include all the sites located in third countries (excluding those where a valid GMP agreement for the dosage form and/or the activity in question is in place) and for which a GMP inspection will be requested by the CxMP in the year X. Inspections requested in the year X are expected to be completed within 12 months from the month they were adopted unless otherwise justified. Because of the requirement set in the Compilation of Community Procedures, a site is usually re-inspected with a frequency which does not exceed three years unless otherwise justified<sup>1</sup>. This means that, in principle, sites where inspections are to be carried out in the year X+1, have been last inspected in the year X-2. In order to identify the manufacturing sites to be inspected, the P-CI-MQC section maintain an Access-based database (in this WIN called GMP database) in which these sites are recorded, together with the inspections dates.

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<sup>1</sup> For inspections of quality control facilities located in 3rd countries, the interval between inspections should be no longer than 5 years (see WIN/INSP/2047).

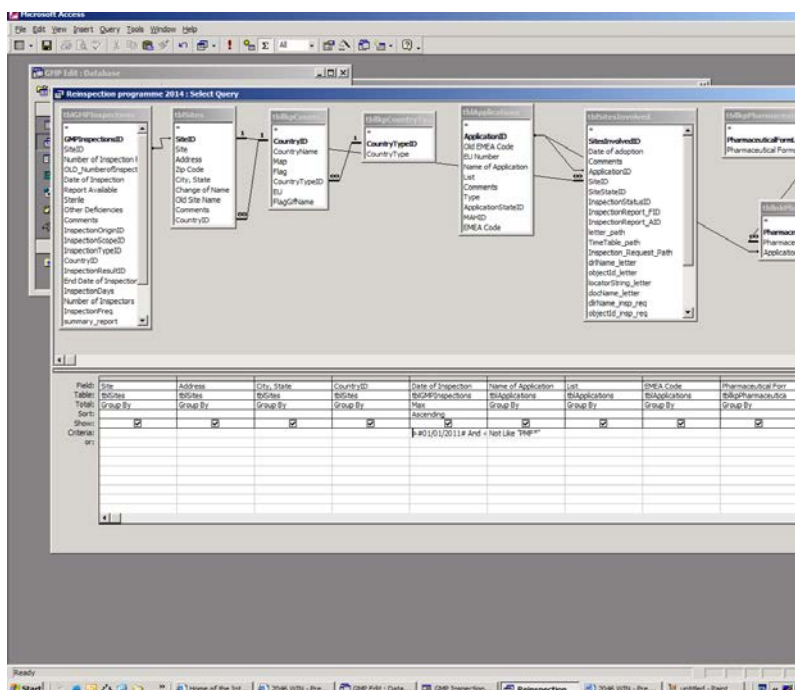
Step	Action	Responsibility
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1. By October of year X-1, in order to comply with the requirements of the Compilation of Community Procedures on the re-inspections frequency and on request of the Administrator, prepare a query in the GMP database according to the following instructions:

- Select 'Objects-Queries' in the 'GMP Edit: Database' window;
- Select, copy and paste one of the existing queries called 'Re-inspection Programme YYYY';
- Rename new query with current year and double-click to open it;




- Click on the first icon on the toolbar to change to 'Design View' (see screenshot):



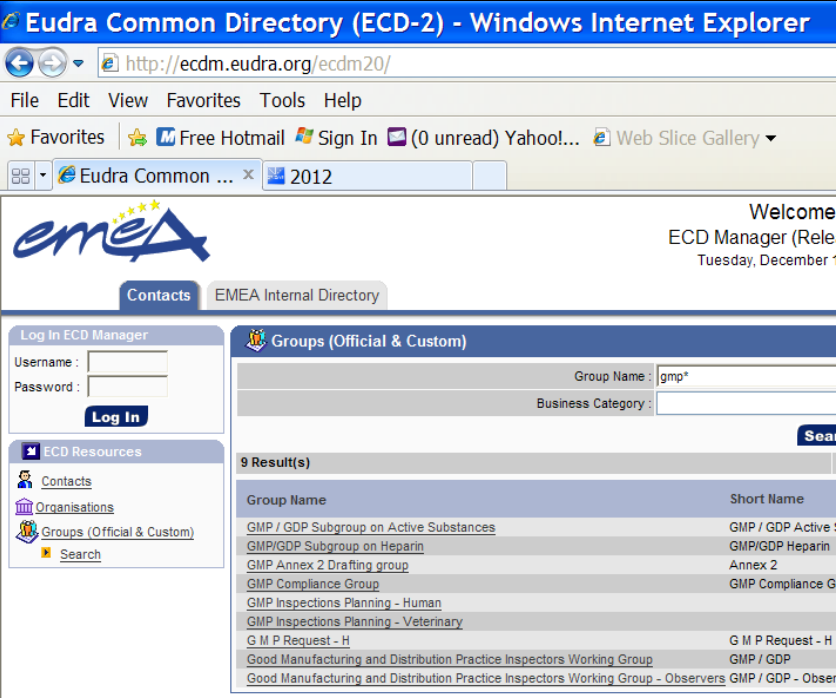
- Modify the query by changing the 'Criteria' in the 'Date of inspection' field, to include the dates of inspections carried out between 1 January and 31 December of the year X-2 (e.g. for the 2013 programme, >#01/01/2011# And <#31/12/2011#);

Field:	Site	Address	City_State	CountryID	Date of Inspection	Name of Applicato
Table:	tblSites	tblSites	tblSites	tblSites	tblGMPInspections	tblApplications
Total:	Group By	Group By	Group By	Group By	Max	Group By
Sort:					Ascending	
Show:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Criteria:					>#01/01/2011# And <#31/12/2011#	Not Like "PMF"
or:						

- In order to identify quality control facilities, run also a query for

Step	Action	Responsibility
	<p>years X-3 and X-4, as this would allow to identify quality control sites that are re-inspected within the longest allowed interval of 5 years;</p> <ul style="list-style-type: none"> <li>• Click on the first icon  on the toolbar to change to 'Datasheet View';</li> <li>• Click on 'Save' in order to export the query.</li> </ul> <p>These queries will allow to identify the sites inspected in the year X-2, X-3, or X-4.</p>	
2.	<p>The query will allow to obtain the following information for each site:</p> <ul style="list-style-type: none"> <li>• Full address;</li> <li>• Date of last inspection;</li> <li>• Name and pharmaceutical form(s) of each centrally authorised product (CAP) for which one or more manufacturing activities are carried out at the site;</li> </ul> <p>Export the result of the query into an Excel spreadsheet:</p> <ul style="list-style-type: none"> <li>• Click on `File`;</li> <li>• Select `Export`;</li> <li>• Choose location where the file will be saved (e.g. desktop);</li> <li>• Save as `Microsoft Excel 97-2000` format.</li> </ul>	Assistant
3.	<p>Add to the spreadsheet the following information for each site:</p> <ul style="list-style-type: none"> <li>• For each combination CAP/pharmaceutical form, the location of the batch release site;</li> <li>• For each CAP, whether it is a human/veterinary product;</li> <li>• For each combination CAP/pharmaceutical form, the list of activities carried out at the site;</li> <li>• Supervisory authority based on the country where the batch release site is located;</li> <li>• Proposed lead inspectorate chosen among the supervisory authorities;</li> <li>• Proposed supporting inspectorate chosen among the supervisory authorities;</li> <li>• Proposed reporting deadline (12 months from the month of adoption unless otherwise justified).</li> </ul> <p>If necessary, remove the following information from the spreadsheet:</p>	Administrator

Step	Action	Responsibility
	<ul style="list-style-type: none"> <li>• Sites located in third countries with a valid GMP agreement for the dosage form and/or the activity in question;</li> <li>• Sites where manufacture of non-sterile active substances for chemical products is carried out;</li> <li>• Sites where manufacture of AS intermediate for chemical products is carried out;</li> <li>• Sites where quality control for non-sterile active substances for chemical products is carried out.</li> </ul> <p>Keep in the list:</p> <ul style="list-style-type: none"> <li>• Sites which manufacture sterile active substances for chemical products;</li> <li>• Sites which manufacture active substances for biological products;</li> <li>• Sites where quality control of sterile active substances for chemical products is carried out. Their inspection will be subject to the instructions contained in WIN/INSP/2047.</li> </ul>	
4.	<p>By the end of November of year X-1 send the spreadsheet with the draft re-inspection programme to the GMP contact persons of the National Competent Authorities (NCAs) in the EU/EEA Member States, asking to provide feedback in relation to:</p> <ul style="list-style-type: none"> <li>• Inspection team;</li> <li>• Sites recently inspected as part of their national inspection programmes;</li> <li>• Plan to inspect the sites as part of their national inspection programmes.</li> </ul> <p>The list of contact persons can be found on the EMA intranet &gt; Business applications &gt; Eudra Common Directory &gt; Contacts &gt; Groups (Official and Custom).</p> <p>Type 'gmp*' in the field 'Group Name' and select GMP Inspections Planning – Human/Veterinary, as appropriate (see screenshot):</p>	Administrator

Step	Action	Responsibility
		
5.	Collect feedback from NCAs and prepare table with final re-inspection programme, for circulation to the GMP contact persons identified in step 4 by the end of December of year X-1.	Administrator
6.	<p>For each product included in the programme, write an email to the relevant Marketing Authorisation Holder (MAH) informing that the site where the product is manufactured/packaged/tested etc. is going to be inspected using template 1. The email is to be sent by the end of December of year X-1 for the inspections to be requested between January and June of year X; by the end of May of year X, for the inspections to be requested between July and December of year X. Ask to provide the following information:</p> <ul style="list-style-type: none"> <li>• Whether the site has had an inspection in the last two years;</li> <li>• Whether the site will be withdrawn from the marketing authorisation (MA) in the next six months.</li> </ul>	Administrator
7.	Use the information collected in step 6 to finalise the spreadsheet by deleting sites or products which are not due to be inspected.	Administrator
8.	Assign an inspection co-ordinator to each site. This is done by checking in Siamed II who is the GMP inspection co-ordinator for most of the products related to the site. Appointment of the inspection co-ordinator is agreed with the Section Head who is responsible for the implementation of the SOP/EMA/O101.	Administrator
9.	On an on-going basis, add to the scope of a site's inspection, those products (either new or existing) for which a new application (or a line extension/variation) shows that the site will be included in the products' MAs.	Assistant

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<b>Step</b>	<b>Action</b>	<b>Responsibility</b>
	Continue with step 4 of SOP/INSP/2048.	

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