Work plan for GMP/GDP Inspectors Working Group for 2016

Chairperson: David Cockburn  Status: January 2016

1. Meetings scheduled for 2016

- 2-4 February 2016
- 11-13 May 2016
- 21-23 September 2016
- 22-24 November 2016
- A joint meeting with Quality Working Party (QWP) will take place during the September 2016 meeting (21 September)
- A meeting with the group’s Interested Parties is planned to coincide with the November 2016 meeting (23 November)
- Drafting group meetings will normally be held by teleconference or other virtual meeting technology will be used
- Four meetings of the Compliance Group in the margins of the GMP/GDP IWG meetings

2. Inspections under the centralised system

- Development of procedures and co-ordination of inspections relating to centrally authorised products and plasma master files.
  - The Agency will continue to make best use of EU inspection resources by leveraging information from international regulatory authority partners wherever possible and implementing other risk-based approaches agreed in Union procedures. Consideration will also be given to leveraging knowledge gained from the equivalency assessments involved in the
listing of Third Countries by virtue of Article 111b of Directive 2001/83/EC when planning inspections of active substance manufacturers;

- Consideration is needed on the impact of initiatives designed to lead to earlier access to medicines on GMP inspections.

3. International Collaboration on GMP

- **Mutual Recognition Agreement (MRA) general**
  
  - To continue to promote and strengthen international collaboration and convergence through the existing MRA platforms and other programmes (ICMRA\(^1\), PIC/S\(^2\), JAP\(^3\)) in order to avoid duplication of effort in the context of initial evaluations or re-assessments of GMP inspectorates;
  
  - To promote alignment of MRA maintenance programmes between the different MRA partners;
  
  - To continue progress towards the use of the EudraGMDP database by MRA partners to replace the paper exchange of GMP certificates.

- **Canada**
  
  - To finalise work on the Protocol to the Comprehensive Economic and Trade Agreement (CETA) between the EU and Canada on the Mutual Recognition of the Compliance and Enforcement Programme regarding GMP for pharmaceutical products;
  
  - To integrate Canada into the International API Inspection Programme.

- **Japan**
  
  - To continue to work towards extension of the operational scope of the MRA;
  
  - To support the European Commission in negotiations to include all EU Member States under the MRA scope;
  
  - To integrate Japan into the International API Inspection Programme.

- **Switzerland**
  
  - To continue to maintain the functioning of the MRA and to work with the European Commission should changes to the agreement be considered.

- **Australia**
  
  - To continue to maintain the functioning of the MRA and support the European Commission in negotiations to include all EU Member States under the MRA scope;
  
  - To assess upon Australia’s request the equivalency of APVMA’s\(^4\) GMP inspections systems;
  
  - To work with the European Commission in connection with Free Trade talks involving Australia and any potential impact on the MRA.

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\(^1\) International Coalition of Medicines Regulatory Authorities (ICMRA)

\(^2\) The Pharmaceutical Inspection Convention and Pharmaceutical Inspection Co-operation Scheme (PIC/S)

\(^3\) Jap Audit Programme (JAP)

\(^4\) Australian Pesticides and Veterinary Medicines Authority (APVMA)
• **MRA with New Zealand**
  - To continue to maintain the functioning of the MRA and support the European Commission in negotiations to include all EU member states under the MRA scope;
  - To work with the European Commission in connection with Free Trade talks involving New Zealand and any potential impact on the MRA.

• **MRA (ACAA) with Israel**
  - To continue to improve and maintain the functioning of the MRA (ACAA).

• **United States of America (EU-US Mutual Reliance Initiative)**
  - Upon completion of equivalency assessments to work with US-FDA on agreeing the next steps necessary to achieve the aims of the initiative.

• **India**
  - Supporting collaborative initiatives with Indian regulators (e.g. capacity building and training on EU GMP standards).

4. **Harmonisation topics**

• **Joint Audit Programme**

  Through the Compliance Group:
  - To ensure that the agreed audit programme for 2016 is carried out and to report to the Heads of Medicines Agencies on the 2015 programme;
  - To adopt and implement risk-based audit procedures;
  - To monitor the results of audits and follow up as necessary;
  - To collaborate with PIC/S and MRA partners in joint audits;
  - To ensure auditor resource contribution to the audit programme.

• **Compilation of Union Procedures on Inspections and Exchange of Information**
  - To continue to identify GMP and GDP inspection related topics for development as Union procedures;
  - To develop harmonised approaches to compliance management;
  - Finalisation of the procedure for dealing with serious GDP non-compliance;
  - Dealing with non-compliance in the context of excipients;
  - The group will continue to discuss harmonised approaches to dealing with “atypical actives”.

• **Implementation of GMP guidance on the use of cross-contamination risk management in shared manufacturing facilities for the manufacture of different medicinal products**
  - To establish an EU implementation team.

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5 Agreements on Conformity Assessment and Acceptance of industrial products (ACAA)
• **Heparin**
  – To develop and implement an appropriate supervision plan for the heparin supply chain in consultation with international partners.

• **GMP Certificates**
  – To harmonise practices in relation to the listing of products or active substances in GMP Certificates.

• **GMP for biological active substances**
  – To harmonise GMP expectations in view of the differing levels of detail between Parts I and II of the GMP Guide.

• **Data Integrity**
  – To develop principles for inspectorates when dealing with findings of non-compliance due to data integrity issues or when dealing with reports of non-compliance due to data integrity issues issued by authorities from third countries.

## 5. GMP and GDP topics

To continue to identify GMP and GDP topics for guideline development or clarification.

• **GMP Guide: Chapter 1**
  – To decide on whether to proceed with a proposal to amend the chapter in order to capture the main principles of the industry inter-association shortages taskforce guidelines aimed at reducing shortages caused by quality/manufacturing problems.

• **GMP Guide: Chapter 4**
  – To consider whether amendments are required in order to assure data integrity in the context of GMP. Early guidance in the form of Q&As will also be considered.

• **GMP Guide: annex 1**
  – To provide a draft text for public consultation;
  – To adopt and publish advance Q&As dealing with the production of Water for Injections by Reverse Osmosis and control of biofilms.

• **GMP Guide: annex 17 (parametric release)**
  – To finalise the revision aimed at updating this annex.

• **GMP Guide: annex 21 (New: Importation of medicinal products)**
  – To provide a draft text for public consultation.

• **GMP Guidance on Data Integrity**
  – To clarify data integrity expectations in relation to GMP including whether short term measures should be developed followed by longer term measures.

Note: In accordance with the cooperation agreement with PIC/S, non-EEA participation in drafting groups will be sought for documents identified as harmonised.
• To continue to collaborate with the European Commission and the Committee for Advanced Therapies (CAT) on the proposal for development of GMP guidance for advanced therapy medicinal products.

**GMP compliance and Marketing Authorisation Holders**

- To develop a Reflection Paper on the relationship between GMP Compliance and the responsibilities and activities of Marketing Authorisation Holders.

**EudraGMDP database**

- To continue to oversee the EudraGMDP database and to act upon the recommendations of the EudraGMDP IT subgroup formed to advise the group;
- To promote further use of the planning module as a tool for international collaboration;
- To develop harmonised data entry rules to promote improved data quality and alignment with the Agency’s Information Management Strategy;
- To develop harmonised use of the “Special Requirements” menu in the light of updated GMP guidance on shared manufacturing facilities.

6. **Collaboration with European Commission**

**EU enlargement**

To develop contacts and collaboration in the field of GMP inspections with EU candidate and accession countries identified by the European Commission. These countries are invited to observe meetings of GMP/GDP IWG.

**Legislative developments**

To monitor new legislation, to assess and advise on potential impact on GMP, GDP, inspections or inspection-related activities. Particular attention will be given to:

- The development of plan to assess the impact of the Clinical Trials Regulation (Regulation (EU) No 536/2014) on GMP inspection and related activities and agree on practical implementation steps;
- The development of the detailed Commission guidelines on good manufacturing practice for investigational medicinal products for human use;
- To monitor the development of new legislation for veterinary medicinal products.

**Article 111b(1) equivalency assessment**

To support the European Commission in the equivalency assessment of the supervision of active substance manufacturers by third country authorities at their request.

7. **Liaison with other groups**

To maintain dialogue and monitor developments involving external groups in areas of common interest in order to communicate the work of the group and to assess the impact of other groups’ activities on GMP and GDP guidance, Compilation of Union Procedures and other inspection related activities:

- Committee for Advanced Medicinal Products;
- Biologics Working Party;
• GCP Inspectors Working Group;
• Safety Working Party;
• Industry associations and relevant professional associations (Interested Parties);
• European Directorate for the Quality of Medicines and Healthcare;
• Heads of Medicines Agencies;
• Non-EU regulators;
• Joint CHMP/CVMP Quality Working Party. There is common interest in active substance/excipient mixtures;
• EU Process Analytical Technology team;
• Pharmacovigilance Inspectors Working Group;
• Pharmaceutical Inspection Cooperation Scheme (PIC/S):
  – Opportunities for joint training on emerging topics will be explored;
  – Harmonisation of GMP/GDP guides, interpretations and other procedures;
  – Promoting of EU standards and systems in the supervision of pharmaceutical industry;
  – Collaboration on audit programmes.
• Heads of Medicines Agencies’ Working Group of Enforcement Officers;
• World Health Organisation.

Particular attention will be paid to supporting collaborative activities aimed at optimising the use of inspection resources, capacity building and promoting the adoption of EU regulatory approaches. It is envisaged that these should be achieved through existing international platforms.

8. Other

• **ICH Q12 (Lifecycle Management)**
  – To support the EU constituency in developing the guideline with particular emphasis on GMP inspection and Pharmaceutical Quality System aspects.

The group will undertake any other relevant work referred to it by the European Commission, Heads of Medicines Agencies or the scientific committees of the European Medicines Agency. This will include contributing as needed in the EU regulatory network’s response to crises resulting from serious quality/manufacturing problems and/or GMP non-compliance.