### PAN AMERICAN NETWORK FOR DRUG REGULATORY HARMONIZATION

### Second Meeting of the Working Group on Good Manufacturing Practices



Pan American Health Organization Regional Office of the World Health Organization



### PAN AMERICAN NETWORK ON DRUG REGULATORY HARMONIZATION (PANDRH)

### SECOND MEETING WORKING GROUP ON GOOD MANUFACTURING PRACTICES

Mexico City, Mexico 5-7 May 2003

### **PARTICIPANTS**

Elsa Castejón, MSDS Venezuela Stephen McCaul, Health Canada (in lieu of France Dansereau) Suzana Machado Avila, ANVISA Magdalena Reyes, Instituto de Salud Pública de Chile Rodolfo Monchetto, ANMAT (in lieu of Carlos Chiale) Marisela Benaim, ALIFAR (in lieu of Miguel Maito) Justina A. Molzon, FDA, Coordinator Marco A. Vega, FIFARMA José Luis Aguilar, MSPAS Guatemala (arrived a day later)

### Resource Persons

Rebeca Rodríguez, FDA Mildred Barber, FDA

### Others

Suleta García, COFEPRIS Rosa María Morales, COFEPRIS

### Secretariat

Rosario D'Alessio, PAHO/WHO

### **AGENDA**

1. Overview of PANDRH and background information on the activities of the WG/GMP: Justina Molzon (Annex 1)

### 2. Past and Future Educational Activities

Justina Molzon presented details on the educational activities and the participants made several comments:

- There is a need to increase educational activities
- The WHO modules were considered less demanding than the WHO-1992 standards requirements
- It is recommended to combine the content of both educational modules / programs: WHO education modules and FDA documents.
- While some countries replicated national seminars, there are some that need more support and involvement of schools of pharmacy of universities to implement more educational activities
- The GW/GMP recognized that the educational activities should be self-financed
- Regional seminars and national seminars promoted by PANDRH should be primarily addressed to those that can replicate the activity at a national level
- There is a need for a more appropriate and accurate selection of the participants to the regional and PANDRH courses
- The ideal team to replicate the activities are universities, official inspectors and the industry
- The next courses need to be focused on a specific area of GMP such as validation, water, etc. It was noted that WHO has recently prepared special modules.

### 3. The III Pan American Conference on Drug Regulatory Harmonization: Review of the Recommendations and Decisions made to the WG/GMP: Justina Molzon

### 4. Review on the Updated Rules & Regulations of PANDRH Working Groups: Rosario D'Alessio (Annex 2)

• Emphasis was made on the responsibility of members to participate in the WG meetings, the membership continuity and the need to receive confirmation from the Ministry of Health regarding the members representing governments. The members were urged to send their CV to the Secretariat.

### 5. Guideline for GMP Inspection

- The group reviewed the draft guideline previously distributed to all members. A. Monchetto, in lieu of C. Chiale (member from Argentina), presented the guideline.
- The guideline has 12 chapters and is based on the WHO-92 requirements

- The group acknowledges that the guideline is being discussed at MERCOSUR and that so far they have reached consensus until chapter 8. Even though it was noted that the draft guideline is under discussion, the guideline will be considered from this moment as a draft for the WG work.
- The final draft of the guideline will include recommendations from each member of the group.
- Some of the main discussions included:
  - Validation: The guideline should have a separate chapter on this subject which should include validation of water, of processes and of information systems
  - Segregation Areas (penicillin cephalosporin): Even though the majority of members agreed on the idea of having segregation areas for manufacturing avoiding cross-contamination, it was recognized that the requirements of WHO needed to be more clear and to include examples to avoid confusion and contradictory criteria on this subject.
  - R. Monchetto from Argentina was designated responsible for including the comments and recommendations of the members in the final version of the draft and for sending it to the Secretariat by the end of May 2003.
  - Major concerns regarding risk factors, flow and a possible need for inspectors training were expressed.
- General requirements should be considered previous to the inspection. Only manufacturers in operation should be inspected. The manufacturer should have:
  - A list of products with registration number and pharmaceutical forms
  - A quality control system in place
  - A continuous training program
  - Updated documentation (ISO 2000)
  - Statistical analysis of problems related to quality
  - Organizational structure with a clear separation of quality control from production and a clear definition of the staff responsibilities
  - A professional responsible of quality assurance with direct relation to the management of the company
  - An architectonic design of its facilities (water /air equipment location)
  - An official authorization to operate (national/local)

### 6. Process to validate the GMP Guideline

There will be two processes in parallel:

- A pilot phase for validating the use, comprehensiveness of the GMP guideline for inspections as it will be in its final draft (to be sent to PAHO by R. Monchetto by the end of May).
  - The guideline will be tested by a group of three inspectors.

- No member of the WG/GMP will be part of the team of inspectors. Two will be inspectors from regulatory offices and one from PAHO/WHO who will lead the team.
- The two inspectors from the regulatory offices should not be from the country where the inspection takes place. No representative from the industry will be part of the inspector team
- The members of the team to perform the pilot will be hired by PAHO/WHO
- The pilot's objective is to validate the guideline. Thus, it should focus on what in the guideline is not relevant; what is needed and not included; what is contradictory; what is a priority and what is complementary; and what needs to be supported by a national legislation.
- The information gathered during the pilot is confidential. The documents obtained from the inspections will be filed in the PAHO/WHO office.
- It was suggested to validate the guideline in manufacturers of at least two different lines of products
- The inspection will take five days at least
- The countries and the site for the inspections will be determined by FIFARMA and ALIFAR. It was recognized that since this is a validation of the guidelines, the manufacturer should voluntaries for inspections.
- As recommended by the III Conference (see Report), the guideline will be accessible to all interested parties through PAHO's webpage which will include an Internet address where comments can be sent to.
- There will be a post-pilot evaluation of the guideline.
- In May 2003, R. Rodriguez (FDA) will send the questionnaire used by the FDA to all members. S. Machado (Brazil) will consolidate comments.

### Schedule of Implementation:

DATE	ACTION
30 May 2003	A. Mochetto will send the final draft of the guideline
30 May 2003	R. Rodriguez will send the questionnaire to evaluate the guideline
June 2003	PAHO will conform the inspectors team
June 2003	FIFARMA & ALIFAR will send names of manufacturers (site of inspections)
July 2003	Guideline in PAHO's webpage
July-September 2003	Guideline receiving comments through PAHO's webpage
August- September 2003	Inspections in place
October-	PAHO will consolidate comments
December 2003	
January 2004	Next meeting

Note: On 7 May 2003, the Steering Committee approved the proposal presented by the WG/GMP on the validation of the guideline.

### 7. National Quality Assurance Systems presented by Venezuela

- NRA should implement a Quality Management System.
- E. Castejo (Venezuela) will incorporate the requirements from Canada in the proposal.
- The final proposal will be presented and submitted for approval at the Conference.

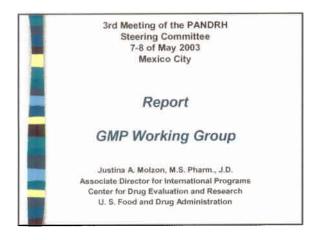
### 8. Next Meeting

Date: January

Place: To be determined

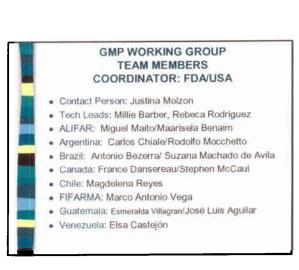
Subjects:

- Results from the pilot
- Review of the comments received through PAHO's webpage
- Possible training of inspectors for appropriate application of the guideline
- Quantitative qualification of the guideline (ponderation)



# Pan American Network for Drug Regulatory Harmonization Work Plan 2000 - 2001 Priorities Approved by the Steering Committee First: Urgent Issues Good Manufacturing Practices Bioequivalence GCP Counterfeit Second: Important Issues Classification Drug Regulatory Agency Third: Recommended Issues

# GMP WORKING GROUP WORKPLAN 2000--2001 Training program design Implementation of training programs Mechanism for monitoring GMP implementation Identify standard under development in other Forum (ICH) (Consultation GMP) Joint inspection/observation (sharing documents) Working Group meeting



The Second Pan American Conference on Drug Regulatory Harmonization Washington, D.C., 2-5 November 1999

Recommendations on GMPs

The training program for GMPs that the FDA proposes to carry out with the UPR and PAHO/WHO should be institutionalized

The program should rely on contributions from government and industry in the interested countries, include distance learning, and take advantage of the installed capacity of the Region.

# SURVEY ON GMP To progress the topic, a survey concerning pharmaceutical GMP training was developed and sent to Latin American Regulators Responses from 12 countries Used to prepare for a meeting of interested parties to the pharmaceutical activities under the FDA/USDA and University of Puerto Rico Partnership Latin American regulators invited to attend

### SURVEY QUESTIONS Are GMPs legally required of drug manufacturers? Are these spelled out in laws or regulations? How many manufacturing sites in the country and how many full-time inspectors perform inspections and enforce compliance? Are certificates of GMP compliance issued? Is there a legal requirement for imported pharmaceuticals to be manufactured under GMP?

What kinds of GMP training would be useful for your

### FDA SYSTEMS-BASED cGMP INSPECTION PROGRAM Concept adapted to UPR GMP training program as it represents state of the art More efficient use of resources More cGMP inspections in less time Coverage of 2 or more systems with mandatory coverage of Quality System Inspect minimum number of systems to provide basis for overall CGMP decision

National GMP Workshops Based on WHO Educational Modules

Based on the WHO report 32 on GMPs
First workshop in Jamaica, April 2000
Translated into Spanish and implemented in all Latin American countries
"Road Show" taught by Professors
University of Costa Rica
National University of Colombia
the Central University of Venezuela

How is compliance determined?

The Pan American Network for Drug Regulatory Harmonization's

GMP Working Group

First Meeting
Caracas, Venezuela
3-4 March, 2002

Mission of Working Group Promover el To promote the conocimiento y la knowledge and implementacion de las implementation of Buenas Practicas de GMPs as a strategy for manufactura, como improving the quality of una estrategia para el medications in the mejorammientode la countries of the calidead de los Americas. medicamentios, en lospaises de las americas.

Prioritized Objectives

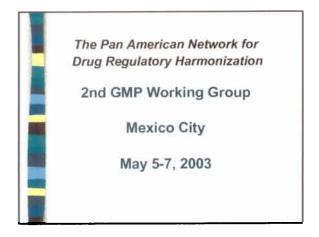
Through individual and collective exercises the participants proposed for the GMP/WG the following objectives, listed in order of priority:

- Knowledge--Education/Training

- Development of a Harmonized Guideline for GMP Inspection

- Monitoring GMP implementation

- Support to Regulatory Authorities

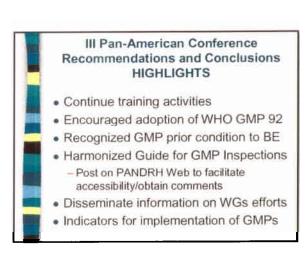




# 2nd Meeting of the Working Group Good Manufacturing Practices AGENDA III Pan-American Conference recommendations and decisions. Guide for Inspection of GMP, approval of a final proposal \*SC\* Strategies to implement Guide for Inspection of GMP \*SC\* Responsibilities of the group Selection of countries Inspectors and places for the test pilot



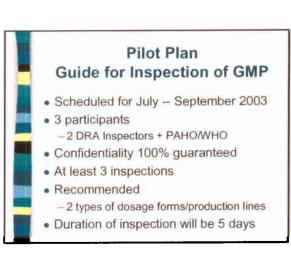
# III Pan-American Conference Report of GMP Working Group Please refer to the reports distributed in English and Spanish Highlights Mission (endorsed by the Conference) Objectives and Work Plan (endorsed) Report of Educational Activities Initial Diagnostic Study (Spanish)



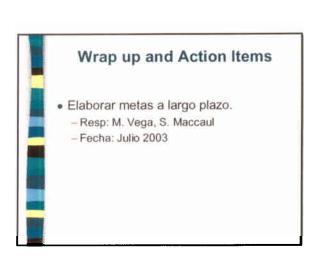
# Guide for Inspection of GMP WG spent past two days discussing proposed document Drafted by ANMAT Follows WHO GMP 92 12 chapters/areas of focus 61 pages long WG proposed additional language and revisions to be incorporated into Guide Integrate WG recommendations by 5/30



### Strategies to Implement Guide for Inspection of GMP Consolidate acceptable comments I month Final Draft used for Pilot of Guide Review PIC/S SOP and apply to Guide Develop SOP for Guide June 2003 Evaluate Guide post Pilot Possible use of FDA questionnaire used in Quality Systems Pilot



### Next Meeting of Working Group December 2003 or January 2004 Discussion of impact of comments on the Guide from interested parties Quantify value of Guide based on Pilot Planning of training/education efforts



### Entrenamiento Curso Avanzado en GMP, basado en Curso FDA, comparado con Reporte 32, 34 y 37 de la OMS. Incluye: agua,aire, esterilización Mayo: Enviar CD ( R. Rodriguez) Julio: Revisar comentarios Agosto: Consolidar comentarios ( Susana) Septiembre: Teleconferencia

# Entrenamiento Definir en Teleconferencia: Financiamiento Cuándo Dónde (países) Instructores

### Se recomienda implementar por parte de las autoridades regulatorias de cada pais un sistema de gestion de calidad, Se recomienda que el Steering Commitee solicite a la conferencia la implementacion de dicha gestion de calidad con los diferentes gobiernos

Elaborar un documento con las recomendaciones basicas sobre que debe contener dicha gestion de calidad y recomendar herramientas como PICs Quality System Requirement for Pharmaceutical Inspectorates.

 Resp: E. Castrejon
 Fecha: 2 meses

### Comparacion de Regulaciones Cada pais revisara como comparan sus propias regulaciones contra la guías 32,34 y37 de la OMS Se suguiere que por medio de PAHO se solicite dicha revision a los paises. FIFARMA coordinara este esfuerzo, recopilara y organizara la informacion.

