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Medicines & Healthcare products Regulatory Agency

MHRA
Regulating Medicines and Medical Devices

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To whom it may concern,

DA on GMP for IMP: MHRA UK's response to EC consultation

In response to the public consultation seeking stakeholders’ views on the content of the detailed Commission Delegated Act on Principles and guidelines on good manufacturing practice for investigation products for human use and inspection procedures, pursuant to the first subparagraph of Article 63(1) of regulation (EU) No. 536/2014 (herein referred to as the Delegated Act on GMP for IMP), MHRA wishes to express the following views and proposals to help the Commission develop its thinking and preparation of the required delegated act.

With respect to Section 3.1 Supervision by inspection of the Delegated Act on GMP for IMP, MHRA is concerned that the proposals for inspection as they are currently written imply that a pre-inspection will take place, which is likely to significantly delay the approval of the trial if the inspection is required to be conducted and reported before a clinical trial authorisation can be approved, which is not compatible with one of the general aims of the regulation change to facilitate research. MHRA is also concerned how meaningful an onsite inspection will be as IMP manufacturers tend to manufacture batches as one-off activities, and so any inspection is unlikely to witness production of specific IMP batches for a specific clinical trial. MHRA is not aware of any requirements within Regulation (EU) No 536/2014 to drive the need for a pre-inspection and considers the need for pre-inspections to be disproportionate in that we have rarely needed to perform such inspections in the last 10 years under the Clinical Trial Directive 2001/20/EC. MHRA therefore proposes that the wording of the requirement for Member States to carry out inspections of IMP manufacturers located in third countries should be reworded as follows:

Member States should not inspect manufacturers of investigational medicinal products located in third countries as a routine according to a fixed schedule but rather according to a risk based approach and at least if there is a suspicion that the investigational medicinal products are not manufactured by applying quality standards at least equivalent to those applicable in the Union.

With respect to Section 3.2 Inspection reports of the Delegated Act on GMP for IMP, MHRA request the Commission considers the implications of the proposal for making GMP inspection reports of IMP manufacturers available to the inspected entity and the sponsor through the EU portal, as MHRA considers reference to Article 78(6) of Regulation (EU) No 536/2014 to be more relevant to GCP inspection reports. The majority of GMP inspections of IMP manufacturers are performed to

assess the general pharmaceutical systems and facilities in relation to holding a manufacturing authorisation and are not specific to any particular clinical trial or sponsor. It is therefore not clear from how the proposal is currently written how the GMP inspection report for contract manufacturers would be made available to all past and present sponsors the contract manufacturer has worked with. At present, GMP inspection reports from manufacturers of commercial medicinal products are made available to the manufacturer but it is only the GMP certificates and not the inspection reports that are uploaded into EudraGMDP. MHRA therefore proposes that the same process is followed for GMP inspections of IMP manufacturers to ensure a consistent approach for manufacturers of commercial and investigational medicinal products.

Kind regards,

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