EUROPEAN COMMISSION
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Industrial affairs III: Consumer goods industries
Pharmaceutical products and Cosmetics

C/inspection/dec98inf

4 February 1999

Information on the outcome of the Expert Group on Inspection and Control of medicinal products

Meeting 17 and 18 December 1998

1. The draft agenda was adopted.

2. The summary record of the meeting on 20 March 1998 was adopted.

3. Starting materials - draft legislative proposal.
The most recent draft of this proposal (14.12.98) was circulated to the participants in advance of the meeting, as well as the opinion[1] of The Scientific Committee on Medicinal Products and Medical Devices[2] – adopted by The Scientific Steering Committee on 9 December 1998. In the light of this opinion, the annex present in previous drafts has been removed and a provision will be introduced to develop a guideline on when an inspection of a starting material manufacturer may be required. The text of the Commission's draft proposal will be finalised in January 1999, it will then be translated and following adoption by the Commission it is expected to be presented to the Council and Parliament in March 1999.

4. EU GMP guide: Draft Revision of Annex 14: Medicinal Products derived from human blood or plasma
This draft revision was developed by the drafting group and was circulated to the consultation partners in May 1998 for comment by August 1998. The compilation of comments received, as well as the draft revision itself, were circulated to the participants in advance of this meeting. The drafting group will meet in January 1999 to review the comments received and finalise the draft revision of this text, which will then be presented to this group and subsequently to the Pharmaceutical Committee for adoption.

5. Preparation of a guideline on the retention of reference samples
The draft concept paper was adopted.

[1] http://europa.eu.int/comm/dg24/health/sc/scmp/outcome_en.html
[2] The Scientific Committee on Medicinal Products and Medical Devices opinion on Starting materials used in human and veterinary medicinal products, for which there is a consumer health/safety concern that needs to be addressed by laying down and enforcing a GMP requirement (XXIV/SCMPMD/98.038 Final).

6. Mutual Recognition Agreements (MRAs)

An oral update on the progress of the various MRA agreements was given by the Commission and EMEA representatives. With respect to the EU/Canada MRA, which came into force on 1 November 1998, it was noted that the first meeting of the Joint Committee was foreseen for 25 and 26 January 1999. In addition, participants were invited to send experts to a workshop which would be organised in May or June 1999. The EU/US agreement came into force on 1st December 1998. A meeting of the overall Joint Committee had taken place in Washington on 8th December. It was expected that the first contacts for a meeting of the joint sectoral group (JSG) on Pharmaceuticals would take place in January 1999. It had been clarified that the reference GMP would be the GMP of the exporting country. There had been recent important progress on the EU/Switzerland agreement with the conclusion of a political agreement between the EU and Switzerland on 11th December 1998. Discussions with Japan were in progress at the time of the meeting. Participants stressed the need for a transitional period.

7. Harmonisation of inspections

7.1 Manufacturers authorisation - EU format(III/5643/98)

EMEA will re-edit this text, making clear, in a cover page which parts are optional. It will then be sent to the Commission for translation into the other 10 languages. The 11 language versions will be presented to the Pharmaceutical Committee with a proposal to implement this format for all manufacturing authorisations issued after 1.7.1999.

7.2 Guideline on inspection reports for centralised products (III/5644/98)

EMEA will re-phrase section B 3 concerning language. The text will then be presented to the Pharmaceutical Committee with a proposal to implement it from 1.7.1999.

7.3 Preliminary draft of an EU format for the inspection report (09 December 1998)

A format for inspection reports for centralised products (EMEA- INS-GMP- 546-1998) has already been agreed and is being used. This format would be used for all other inspections. After a brief discussion it was agreed that re-drafting would be necessary and that the delegates would send their comments to DG III (B. Hughes) before 31.1.99.

8. GMP certificates

It was agreed that the feasibility of using the WHO format would be considered and discussed at the EMEA meeting on 18-19 February 1999.

9. GMP guide (Vol 4) Annex 13

Correspondence from the French authorities and from the EMEA, addressing some difficulties which may arise in the application of this guideline, was circulated prior to the meeting. Following a brief discussion it was agreed that a questionnaire would be formulated on these issues and circulated to each member of this group at the EMEA meeting on 18-19 February 1999.

10. Decentralised procedure – Inspections in 3rd countries

The consensus view of the group was that normally the authorities of the importing country would carry out the inspection in the third country, as is the case for products in the centralised procedure.

11. EDQM

An update on EDQM/Ph. Eur. Activities was provided. The European Pharmacopoeia is now available on a CD-ROM, including the 1999 supplement. The EDQM is organising a scientific meeting on water for injection and the use of reverse osmosis for its production. This meeting will include participants from the industry, the USP and competent authorities. Members of this group were invited to participate. It was also reported that the pilot phase of the sampling and testing of centrally authorised products and the OMCL network was working well.

12 PICS

An update on PICS activities was also provided and it was mentioned that Portugal is now a member.

13. EU batch release

The EMEA policy document (Doc Reference: EMEA-INSP-GMP-155-1998) on this issue, together with related correspondence between the Agency and the Commission, were circulated to the participants. The Commission stressed that each manufacturing step, including packaging, must be done under the control of a qualified person. The Commission also stressed the following points. There is just one "batch release within the meaning of Article 22 of Directive 75/319" and that the size of the batch thus released has to be defined on the basis of the dossier upon which the marketing authorisation (MA) is based. As a general rule, the most crucial manufacturing step (as regards the safety of the product) should determine the size of a batch and this will be set out in the dossier upon which the MA is based. It is therefore evident that in the situation where one batch is packaged in different sites in the EU there should be only one batch release (within the meaning of Article 22 of Directive 75/319) certified by one qualified person who, must take the overall responsibility that the whole batch has been manufactured – from the first to the last step – in accordance with the requirements of the marketing authorisation. According to chapter IV of Directive 75/319, everybody who exercises manufacturing activities has to have at his disposal a qualified person. The responsibilities of a qualified person depend entirely on the manufacturing steps actually carried out by the manufacturer and they may be very limited or very broad. Contrary to this flexible concept, the scope of responsibilities of a qualified person who carries out a "batch release within the meaning of Article 22 of Directive 75/319" are clearly defined: this qualified person must certify, before a medicinal product is released for marketing, that each production batch has been manufactured and checked in accordance with the "requirements of the marketing authorisation" – from the first to the last step of manufacture. In other words: there has always to be one qualified person who takes overall responsibility for the whole manufacture of the entire batch, whilst several other qualified persons may simultaneously,

and in parallel, have responsibilities with regard to the parts of the manufacturing process, they had to supervise.

Following discussion of the above points it was agreed that guidelines would be developed on the operation of the policy outlined in the above mentioned EMEA document (Doc Reference: EMEA-INSP-GMP-155-1998).

14. GMP for actives - EU position on ICH Q7 draft 2
Comments on this document were reviewed. Major issues were identified and the EU position was confirmed in preparation for the ICH expert working group (EWG) drafting meeting on 18-21 January 1999. The deputy rapporteur S. Fairchild agreed to write a summary of the EU position and circulate it for final comment before the 18-21 January meeting.

15. Meetings in 1999
An EMEA meeting is scheduled to take place on 18-19 February 1999. Meetings of this group in Brussels are scheduled for 24-25 March 1999 and 16-17 June 1999, subject to confirmation 3 weeks beforehand.