Good Manufacturing Practice (GMP) Compliance Signals

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GMP compliance signals

for domestic and overseas manufacturers of medicines and biologicals

Guidance on the management of GMP compliance signals | Therapeutic Goods Administration (TGA)

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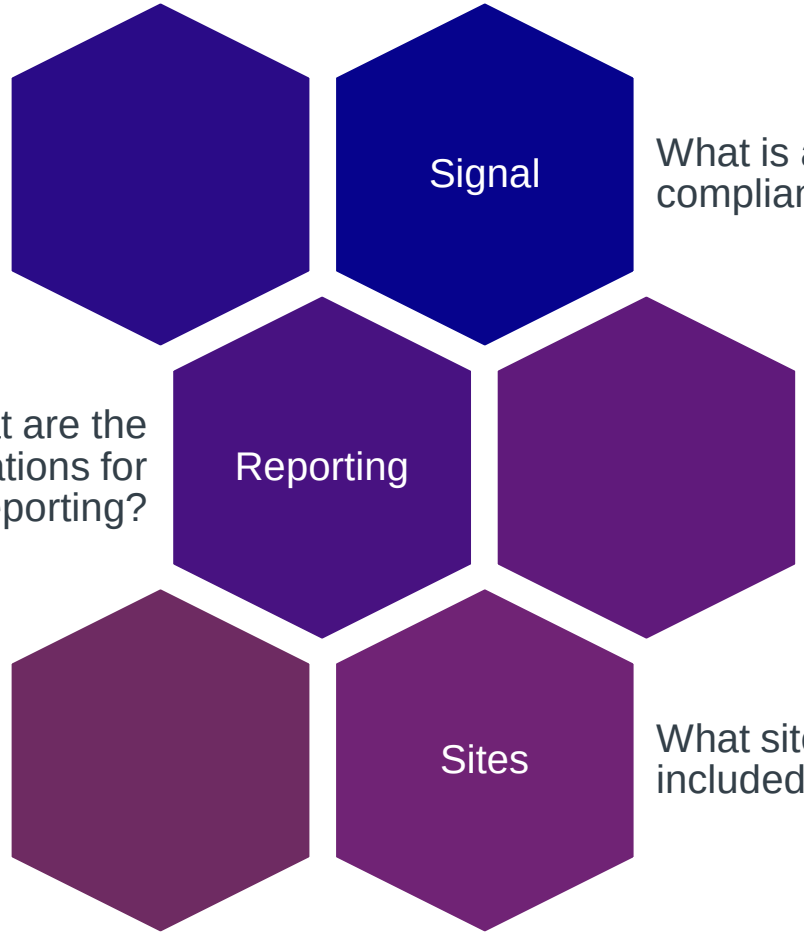

Signal
What is a GMP compliance signal?
What are the expectations for reporting?
Reporting
Sites
What sites are included?

GMP Compliance

Australian Legislative Requirements

Therapeutic Goods Act 1989

Therapeutic Goods Regulations 1990

Manufacturing Principles

Codes of Good Manufacturing Practice

Australian manufacturers

Regulatory framework

Manufacture of therapeutic goods in Australia must occur at GMP licensed site unless the good or the person performing manufacture is exempt

Licensed sites are inspected by TGA GMP inspectors according to a risk based frequency for ongoing compliance with the applicable GMP Guide / Code

Recall of non-complaint products released to the market

The TGA website has information on how to report alleged breach or questionable practices to the TGA Report a breach | Therapeutic Goods Administration (TGA)

Inspections by other regulators e.g. the US-FDA

Sources of compliance signals

- TGA inspections of licensed sites

- Recall actions

- Anonymous tip offs

- Other regulatory agency inspection outcomes

Australian manufacturers - responsibilities

Mandatory reporting

Information relating to quality, safety or efficacy

Requirement under

- sections 40(5) and 40(4)(ab), *Therapeutic Goods Act 1989*

Any information that indicates that the use of the goods in accordance with the recommendations for their use:

- may have an unintended harmful effect
- may not be as effective as was suggested by the application for registration or listing of the medicine or inclusion of the biological
- information that indicates that the quality, safety or efficacy of the goods is unacceptable

Changes to GMP licence

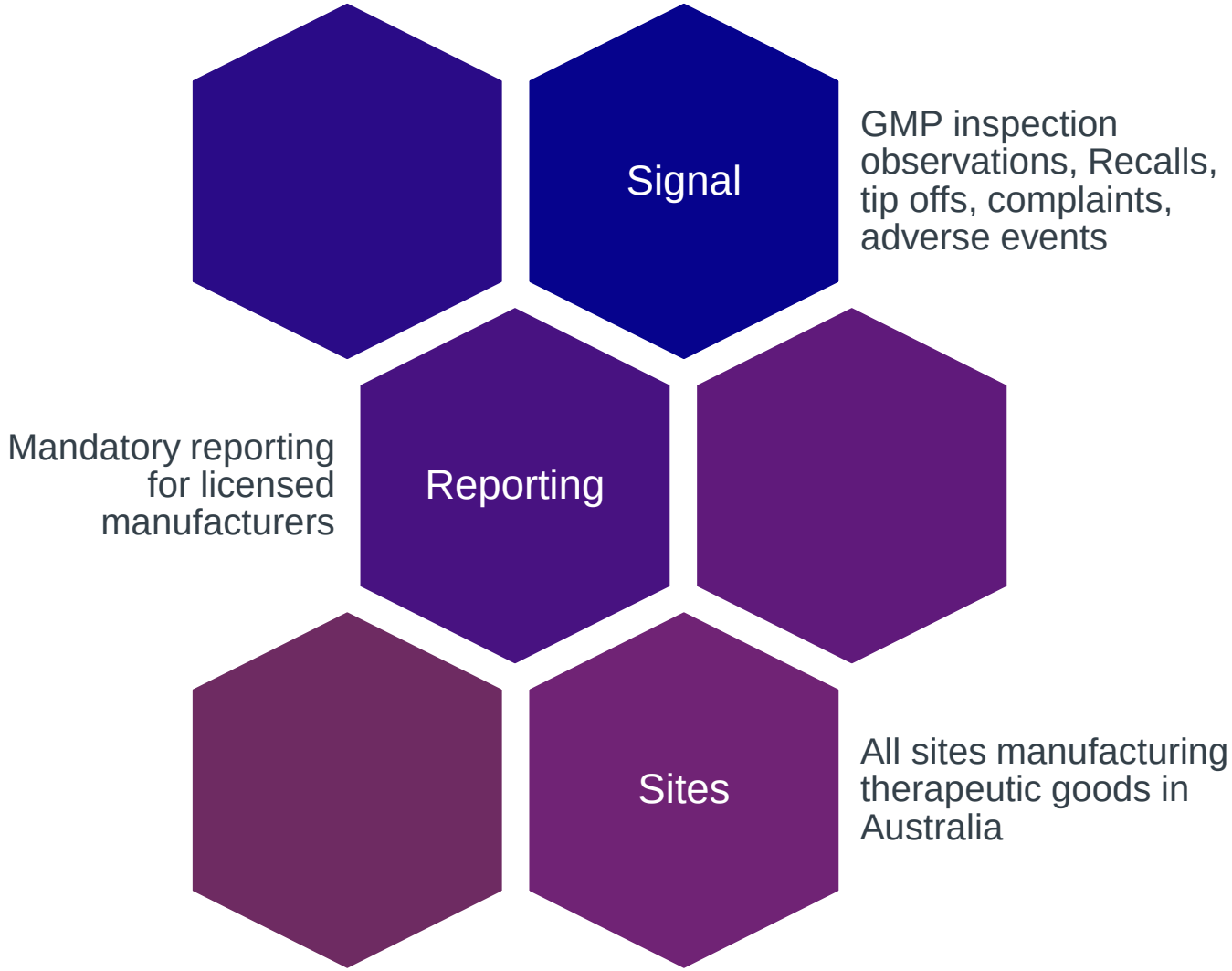
Notify the TGA of any significant changes to the business, including if you intend to change or cease some of your operations:

•email the Manufacturing Quality Branch

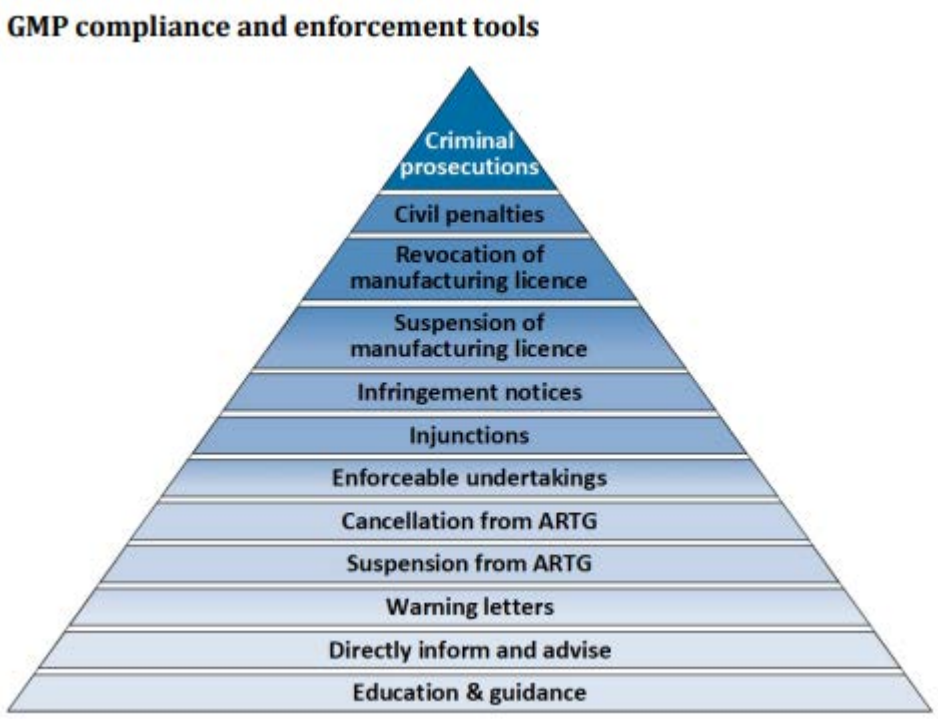
•OR

•Submit a variation application (licence holders only)

Australian manufacturers



Australian manufacturers – regulatory actions



Compliance and enforcement tools

Education and Guidance – GMP Forum / TGA website

Directly inform and advise – TGA inspections / written advice

TGA inspections – compliance tip offs have led to inspections

Warning letters

Infringement notices

Supply to Australians

Global supply chains

- Approximately 400 manufacturing sites licensed in Australia
- Approximately 400 overseas manufacturing sites inspected by the TGA
- Approximately 4100 overseas sites approved to supply Australia based on inspections by equivalent regulators
- GMP Clearance approval requires acceptable GMP evidence for the overseas site

Overseas manufacturers

Manufacturers in the Australian supply chain

Sponsors do not need clearances for all sites in the supply chain **BUT** all can impact the quality of the goods supplied in Australia

A GMP Clearance is used to support the delegate's decision to register or list products on the ARTG.

Manufacturers are inspected by either TGA GMP inspectors or comparable regulators for compliance with the PIC/S GMP Guide

Overseas recall notices, warning letters, withdrawal of CEP, non-conformance alerts

The TGA website has information on how to report alleged breach or questionable practices to the TGA Report a breach | Therapeutic Goods Administration (TGA)

Sources of compliance signals

- GMP Clearance assessments

- TGA Inspections of overseas sites

- Regulatory actions taken by comparable regulators

- Anonymous tip offs

Australian sponsors

Responsibility to report to the TGA

Information relating to quality, safety or efficacy

- **Sponsors of the products on the ARTG**
- **Sponsors holding clearances**

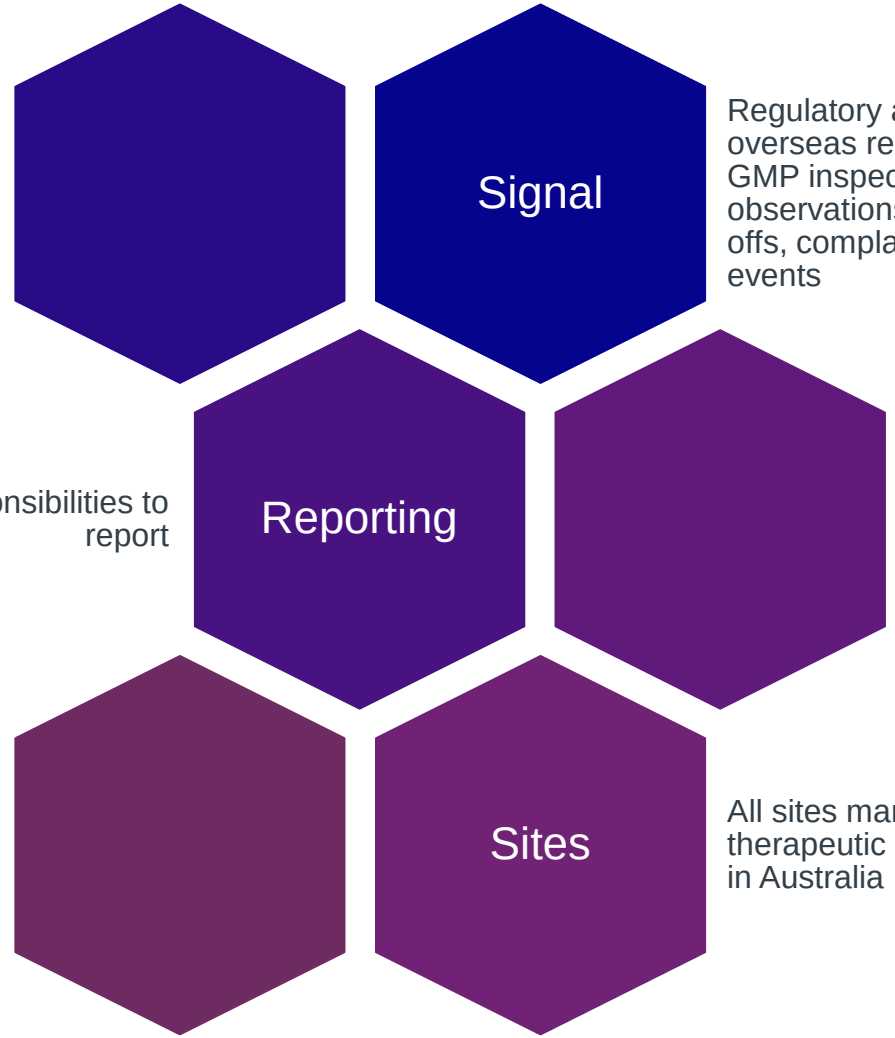
Monitor regulatory actions by any competent overseas regulatory authority (for example, recalls, unacceptable inspection findings, warning letters, import alerts etc.) for manufacturing sites for which you hold an active GMP clearance

Notify the TGA of changes to

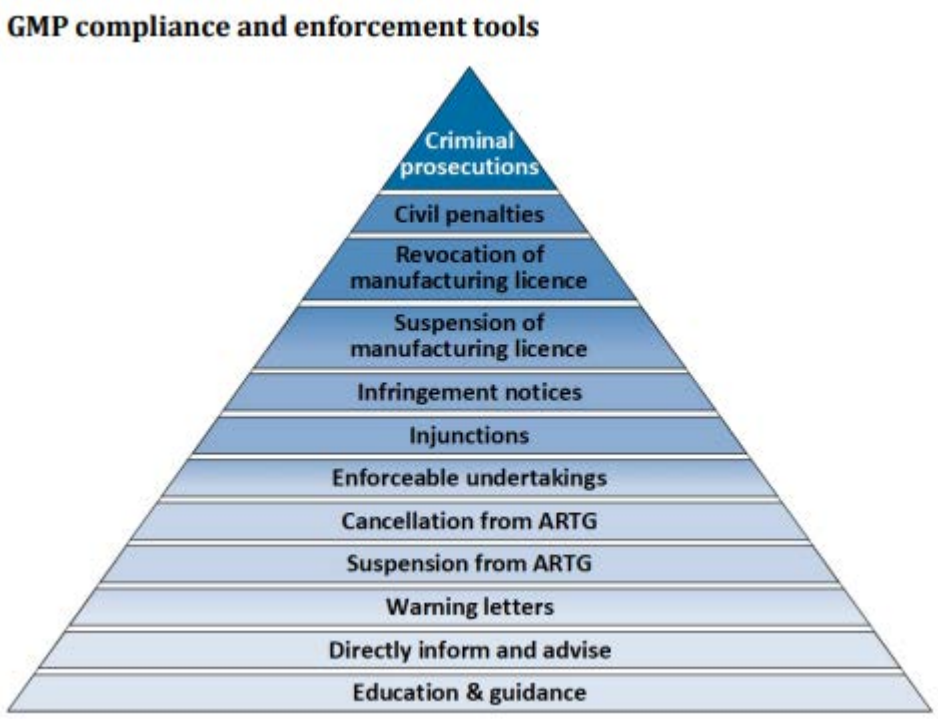
- the manufacturing site,
- quality management system (QMS),
- products or product range

where the changes could potentially impact the GMP compliance of the site

Overseas manufacturers



Australian sponsors



Compliance and Enforcement tools used

Education and Guidance – GMP Forum / TGA website

Directly inform and advise – TGA inspections / written advice

TGA inspections – overseas regulatory action has led to inspections

Cancellation of GMP Clearances

TGA process

What happens

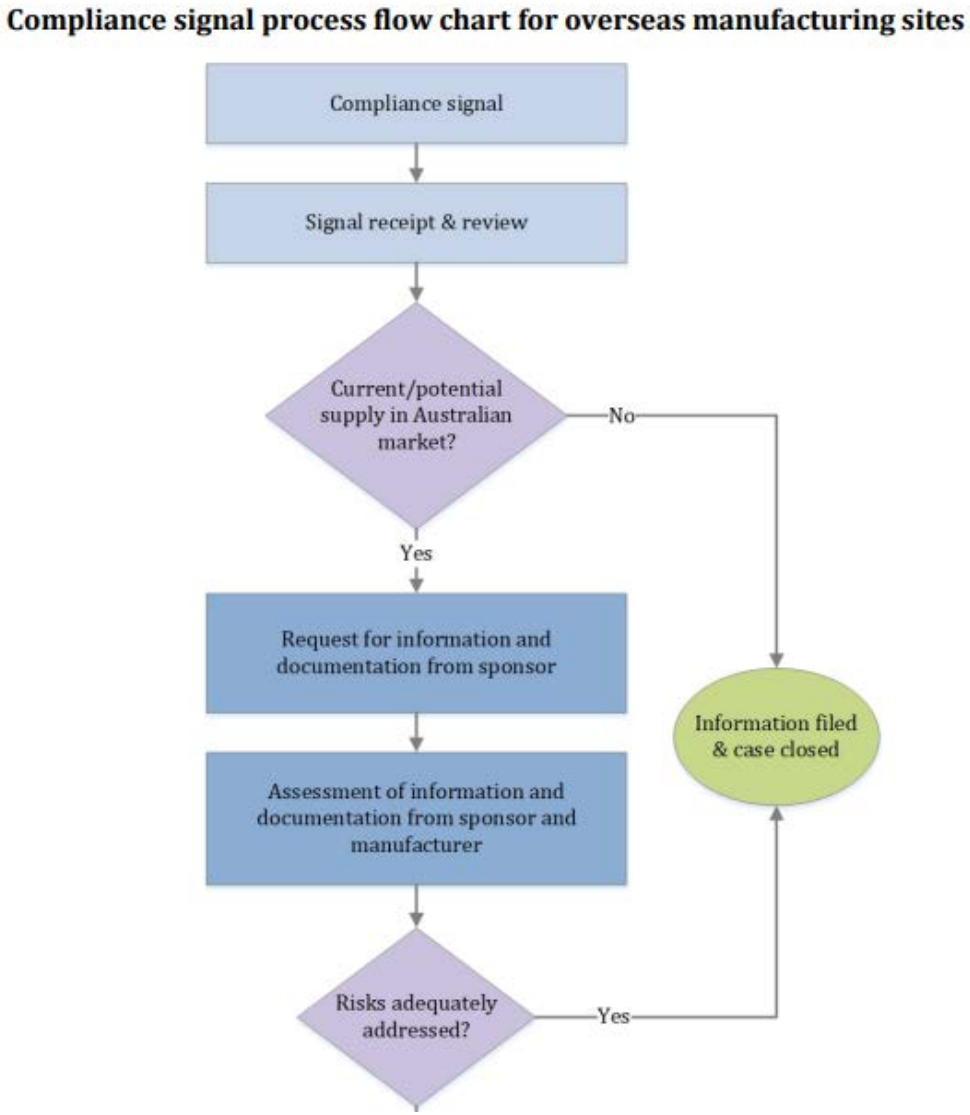
Signal review and investigation phase

- all GMP clearance applications related to the site are placed on hold.
- Sponsors contacted for risk assessment information

Report early – don't wait for clearances to expire

Include relevant information in your risk assessments

- Information on batches supplied to Australia
- Your assessment of the impact on your products
- Adverse event notifications
- Information on any other regulatory action and the manufacturer responses



TGA process

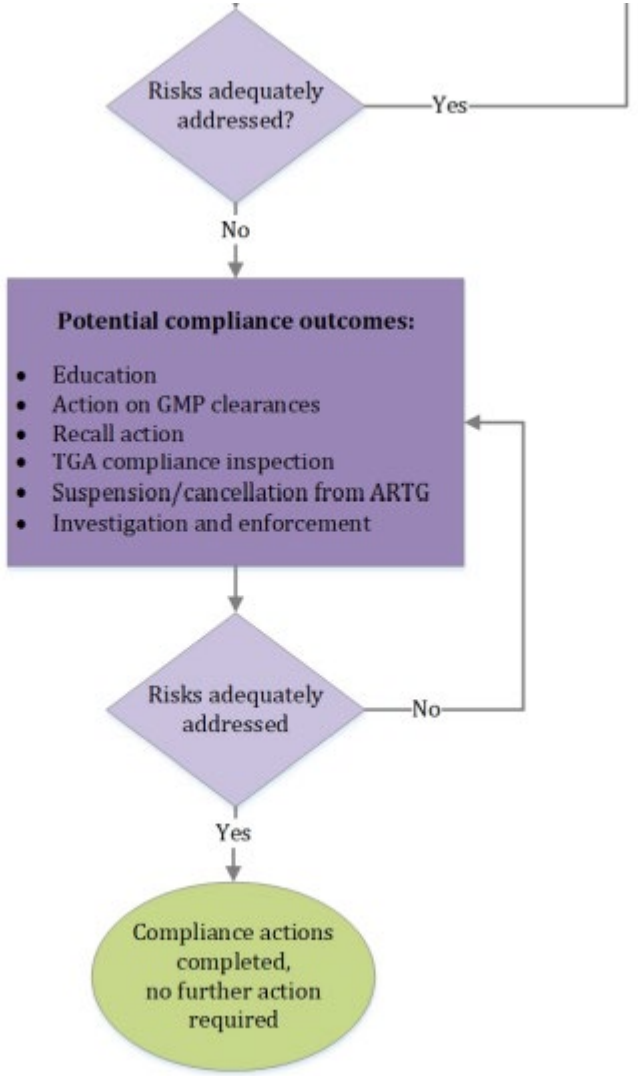
Compliance outcomes

Regulatory actions

- case by case and based on risk

Generally, if

- a GMP certificate withdrawn - we would cancel clearance. (Noting there may be exceptions for medicines in shortage or essential medicines with no or limited manufacturers.)
- an EDQM Certificate of Suitability (CEP) is suspended we would suspend the clearance for impacted APIs at that site.
- an FDA warning letter and the risk assessment did not provide assurance of GMP compliance then we might plan a TGA inspection of the site.



Website references

TGA website	www.tga.gov.au
Guidance on the management of GMP compliance signals | Therapeutic Goods Administration (TGA)	https://www.tga.gov.au/resources/resource/guidance/guidance-management-gmp-compliance-signals
Report a breach | Therapeutic Goods Administration (TGA)	Manufacturing Quality Branch ttps://www.tga.gov.au/how-we-regulate/compliance-and-product-testing/compliance-and-enforcement-hub/report-breach
Email Manufacturing Quality Branch	gmp@tga.gov.au

Therapeutic Goods Administration (TGA)

Exhibition booth **No.1**

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Questions?

www.tga.gov.au

Australian Government

Department of Health and Aged Care

Therapeutic Goods Administration