GMP Clearance: How We Got Here and Where We Are Headed

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GMP FORUM 2024

Agenda

- What it is and why it’s needed
- How we got here - 2016 to 2020
- How we got here - 2020 to 2024
- Where are we now?
- Where we are headed

Knowledge check

What is GMP Clearance?

1. A virtual inspection of an overseas manufacturer using real time interactive elements (live interviews, facility video tours)
2. A desk-top evaluation of an overseas manufacturer that doesn't use Inspection Reliance
3. A desk-top evaluation of an overseas manufacturer that uses Inspection Reliance
4. I don't really understand what GMP Clearance is

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The same QR code will be used throughout the session

Knowledge check

Why is GMP Clearance required in the Australian Regulatory Framework?

1. To satisfy the legislative requirements for the evaluation and listing of medicines under the Therapeutic Goods Act
2. To replicate the Australian licensing scheme for overseas manufacturers supplying Australia
3. To ensure overseas manufacturers for clinical trial product meet GMP
4. I don’t know why Australia requires GMP Clearance

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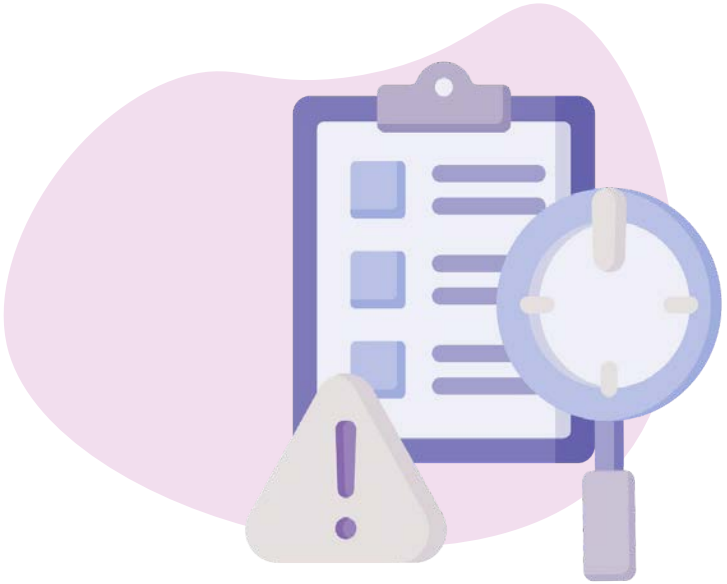
What is it and why is it required?



Desktop Inspection Reliance Evaluation of GMP evidence

- An onsite inspection conducted by trusted partner agency forms the basis of a desktop Inspection Reliance Evaluation (IRE)
- Extent of additional data required from manufacturer or sponsor/Marketing Authorisation (MA) applicant or holder depends on multiple factors
- More product-focused than inspections as each one is specifically linked to an application for MA
- Issued to Sponsor/MAH only

What is it and why is it required?

Several factors can influence the extent of Australia's inspection reliance

- Evaluation of another regulator's equivalence
- History of collaboration and confidence building
- Type and scope of the bi-lateral agreement – is it binding or non-binding?
- Broader understanding of how each regulatory framework operates
- Alignment where possible or mitigation to address potential risks

What is it and why is it required?

History and overview

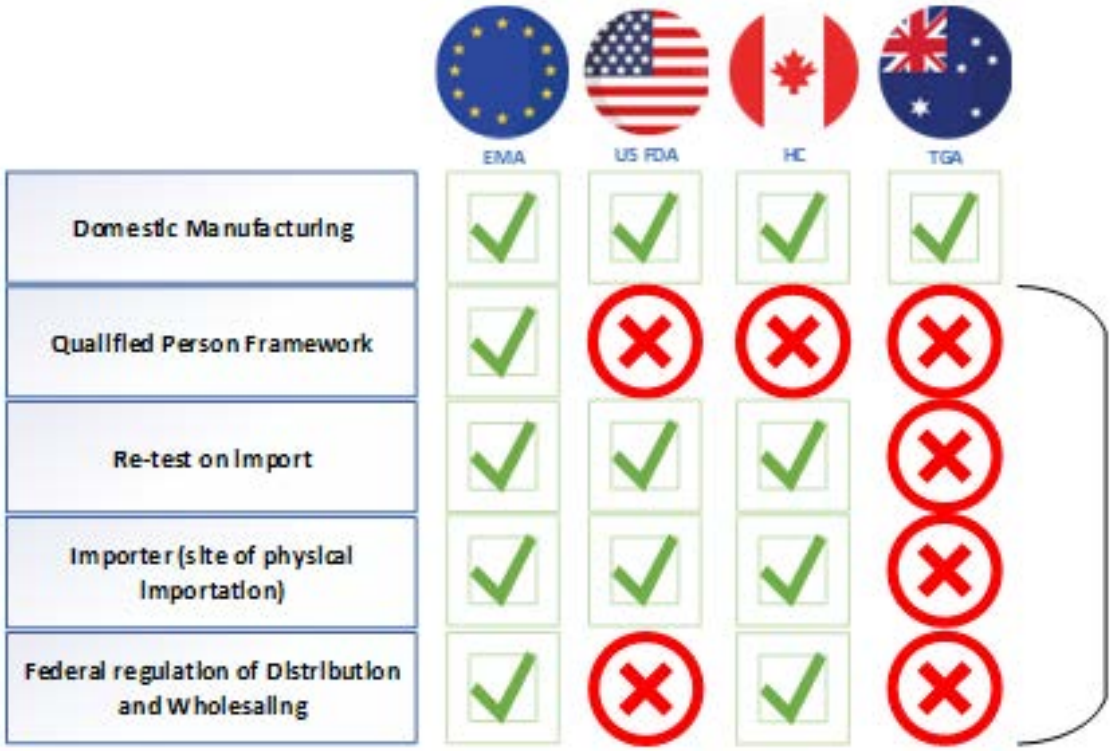
- Introduced over 20 years ago
- Required to satisfy Sections 25(1)(g), 26(1)(g) and 26(A)(3) of the Therapeutic Goods Act 1989
- Entire GMP Clearance framework is currently non-statutory
- Fees are prescribed in Therapeutic Goods Regulations 1990
- Influenced by Australia’s domestic regulatory framework

What is it and why is it required?

- Australia's regulatory framework influences our risk-based inspection reliance approach
- New inspection tools and methods challenge historical reliance processes
- Complexity in global supply chains and distribution networks
- New and innovative medicines and biologicals (platform technologies)
- Constant evolution of global regulations and GMP guides

GMP Clearance considers these differences, adjusting the level of desk-top evaluation accordingly

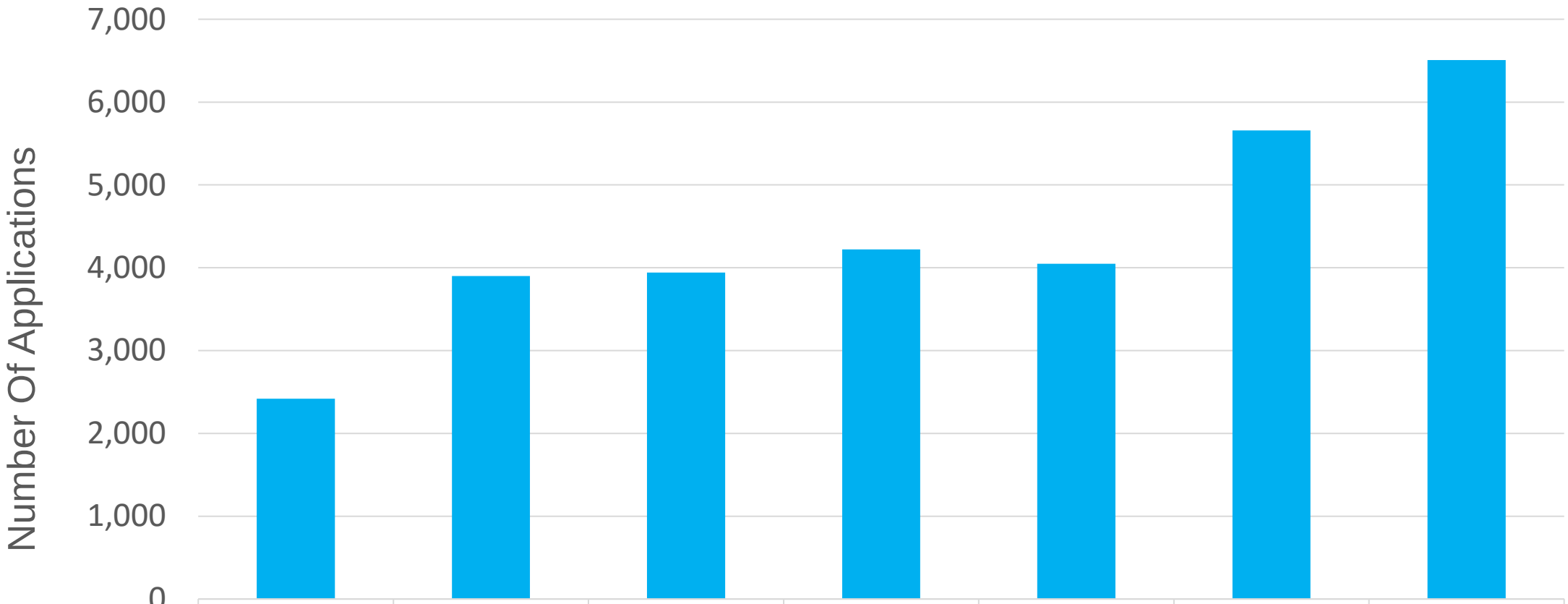
Differences in jurisdictions' legislative frameworks



How did we get here?

How did we get here?

History and overview



	FY 10/11	FY 11/12	FY 12/13	FY 13/14	FY 14/15	FY 15/16	FY 16/17
Clearance Applications	2,418	3,900	3,941	4,222	4,048	5,657	6,506

How did we get here?

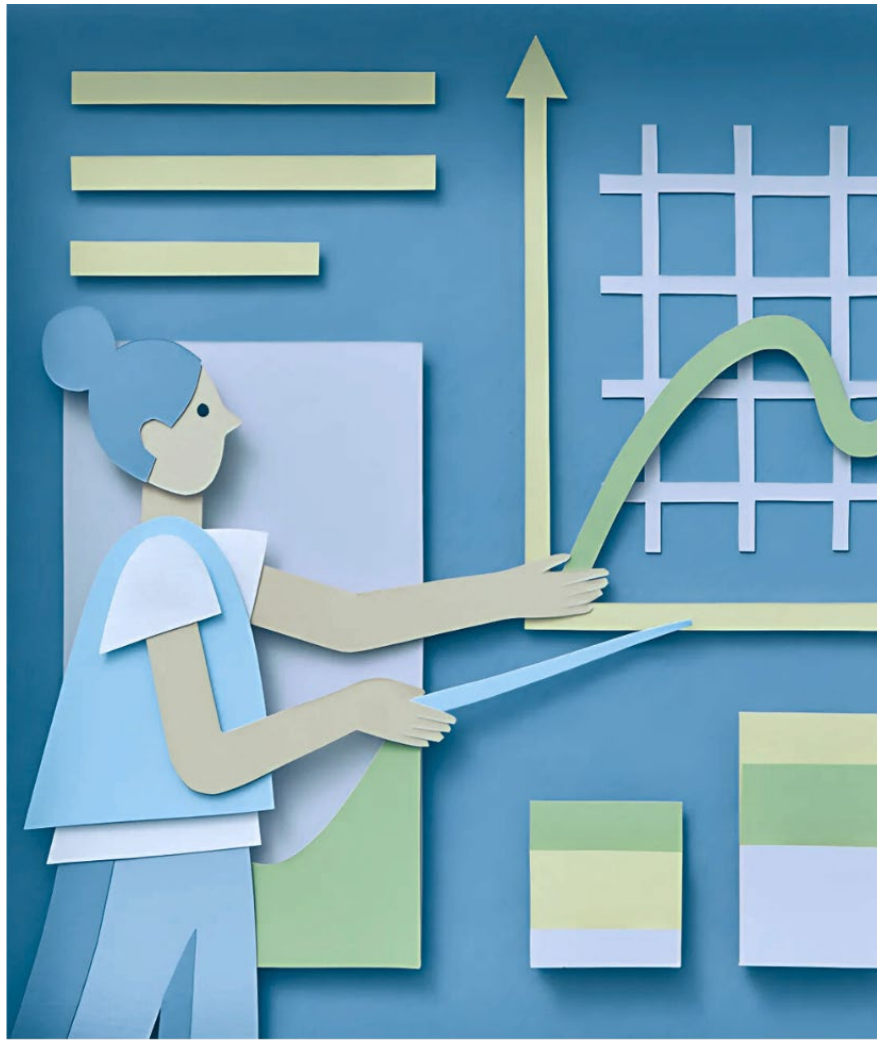
2016 - 2019

2016:

- GMP Clearance team of 4 operations staff and 3 evaluators
- Backlogs everywhere - 90 days to complete a Mutual Recognition Agreement (MRA) application

2018:

- Removed unachievable ‘target’ timeframes
- Recruited and trained additional resources
- Systematically reduced backlog in each application stream
- Developed ‘Interim IT Solution’ for application e-forms



How did we get here?

2016 - 2019

- By November 2019 - GMP ‘Section’ of 20 staff. 5 operations team and 15 evaluators
- No backlogs across all applications streams
- Planned significant reform

How did we get here?

Australian Government
Department of Health
Therapeutic Goods Administration

November 2019

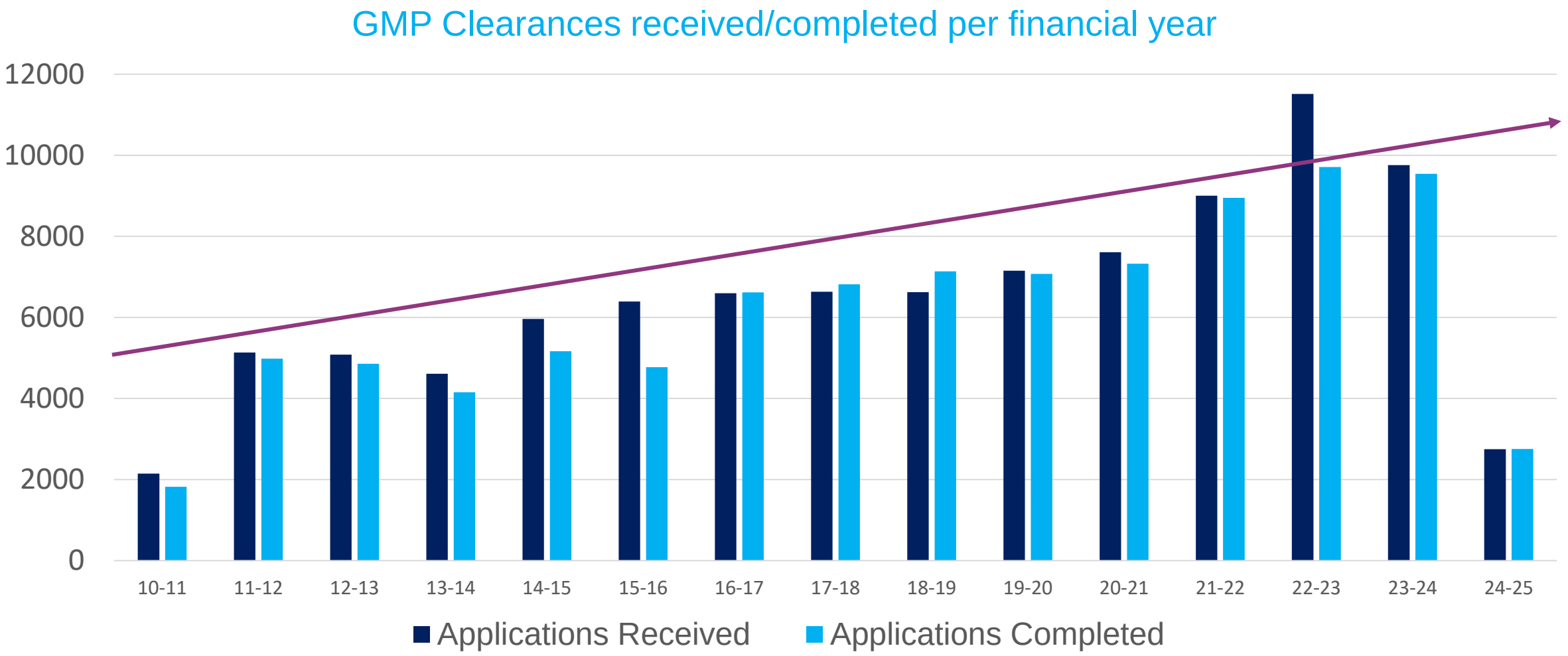
- We are now a GMP Clearance **Section** of 20 staff
  - 5 in application receipt
  - 15 in assessment
- No backlogs across the section
- Accurately capturing TGA vs Industry time
- Improved data analytics to ensure no return to backlog

How did we get here?

2020 - 2024

- Significant period of no on-site inspections
- Reduction in ‘reliance’ aspect of the GMP Clearance framework
- Increased complexity of evaluations
- Flow-on effect of decisions made during early stages of the pandemic
- Prioritisation of Vaccines, treatments and medicine shortages

How did we get here?



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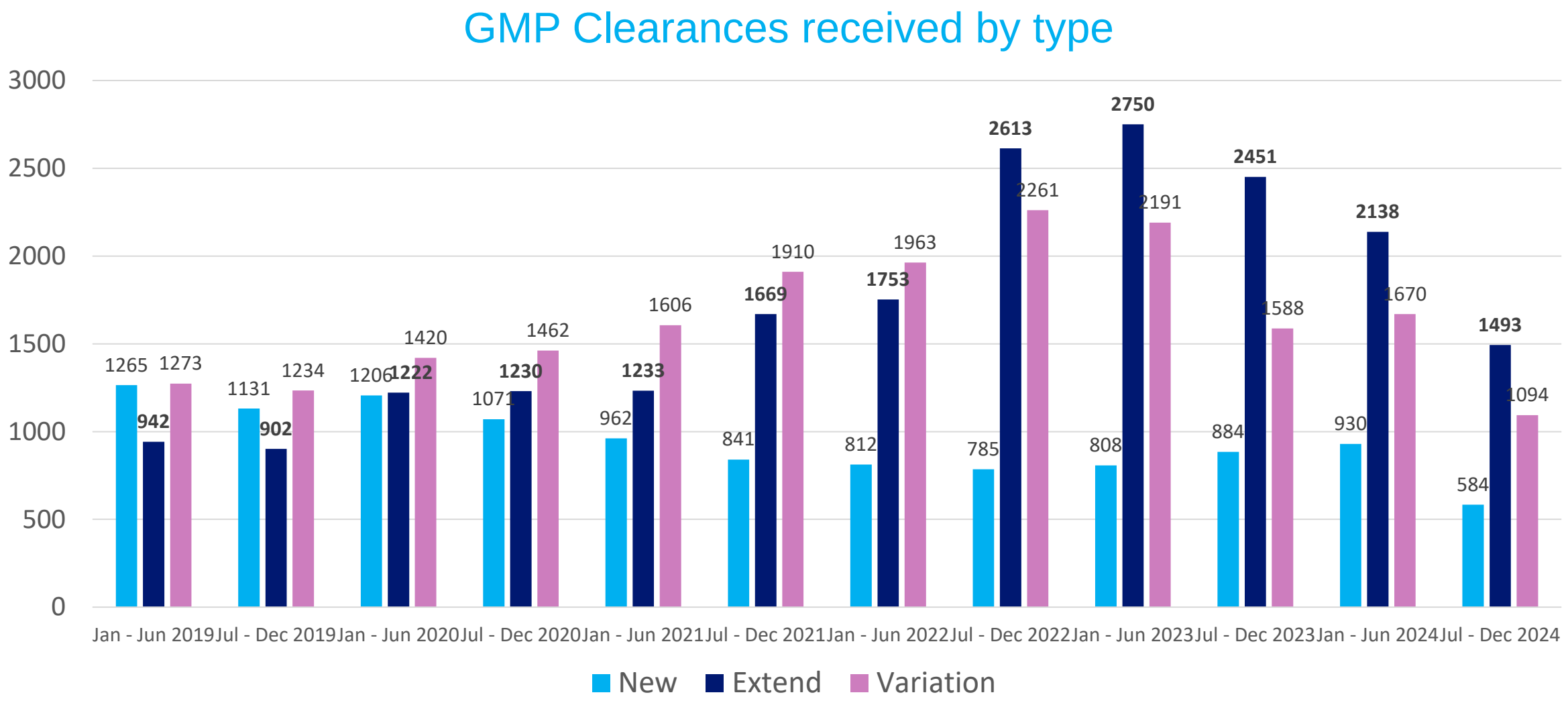

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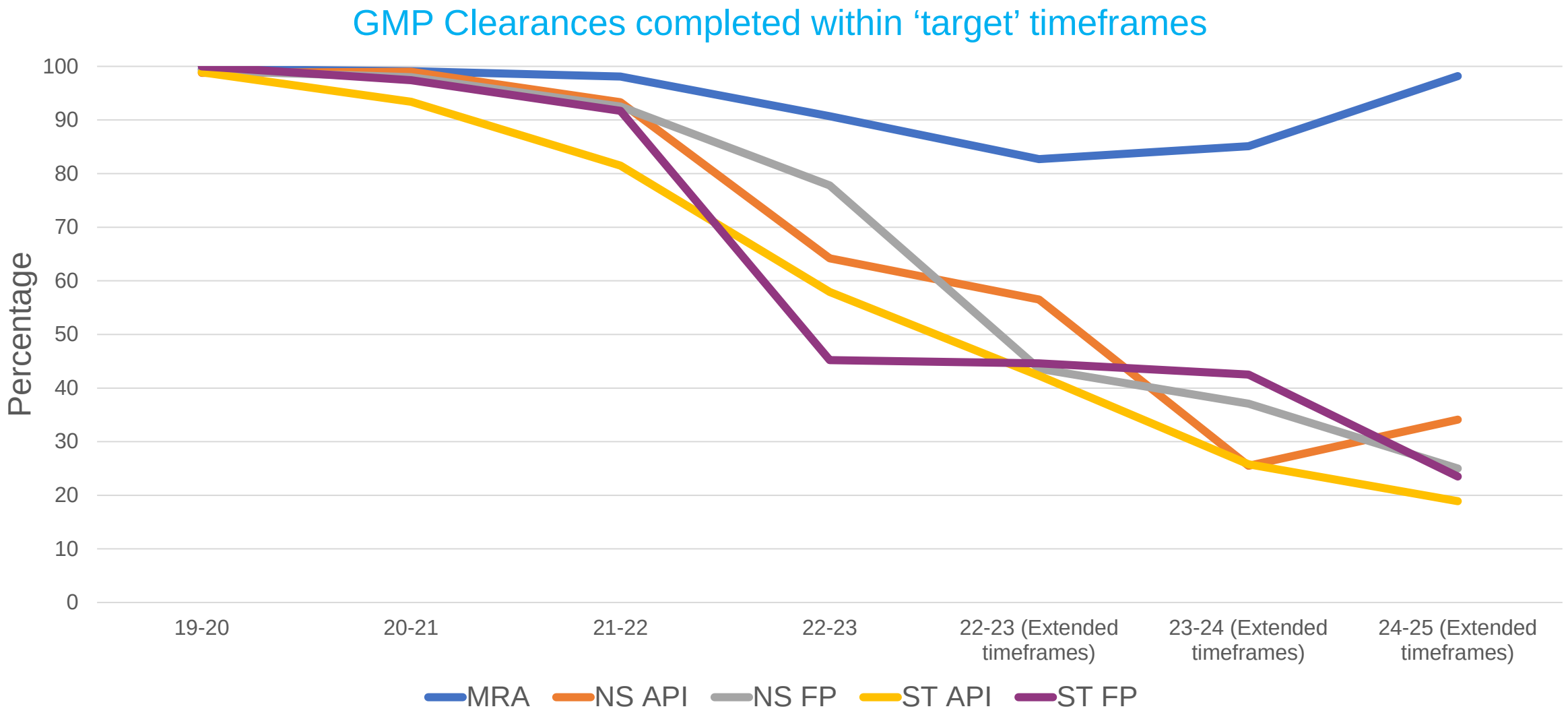
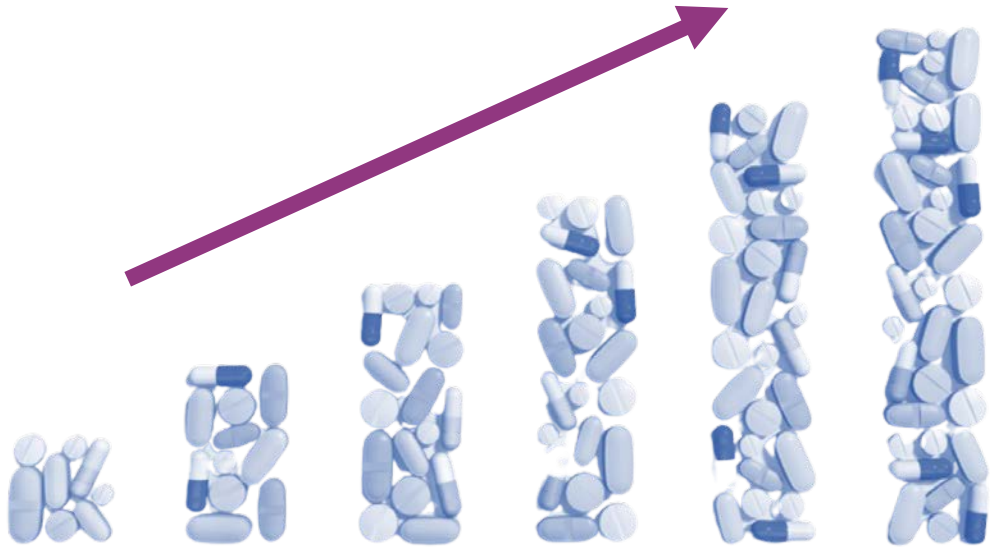


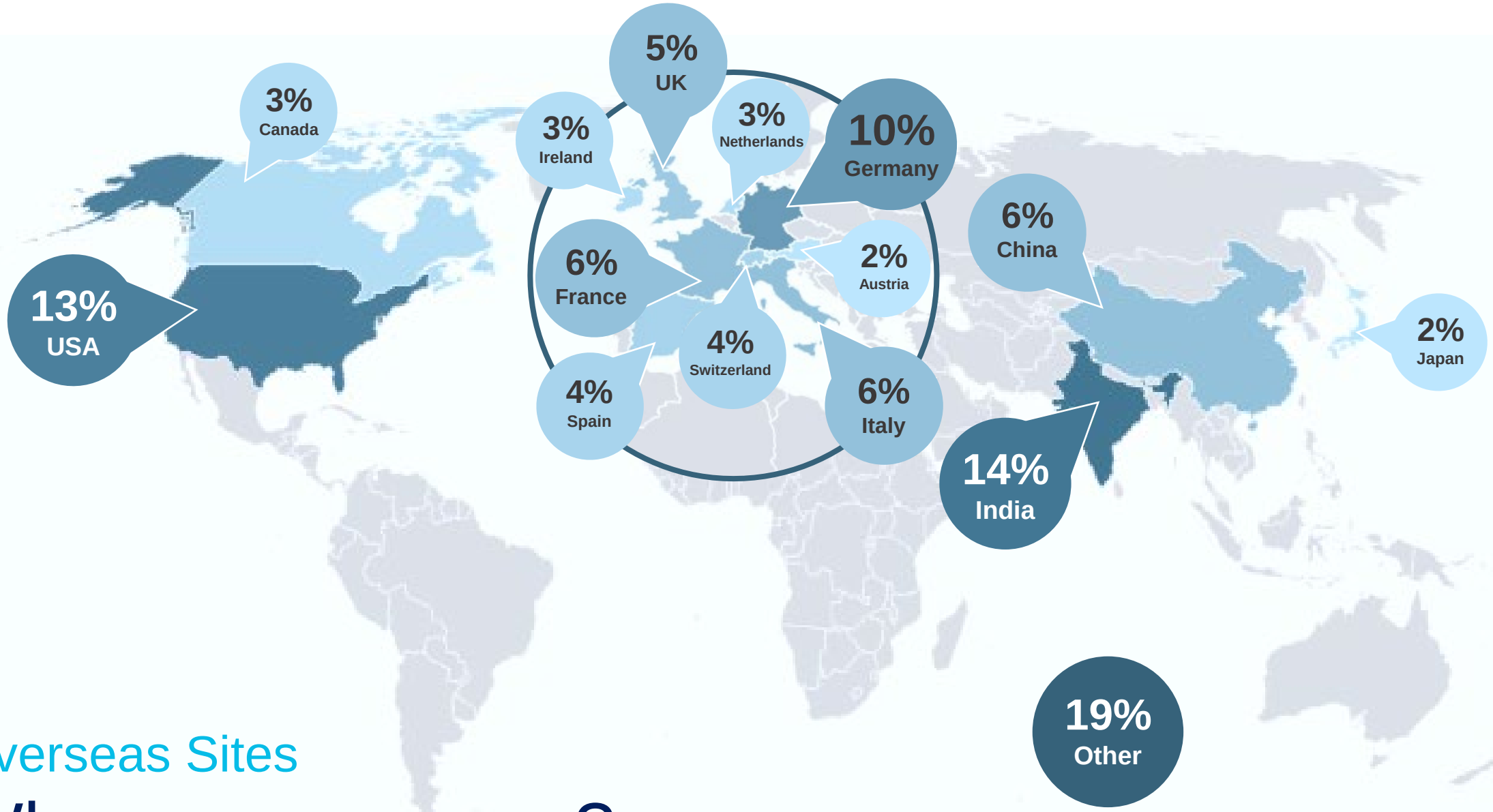
Where are we now?

Where are we now?

But the pandemic is over so…….

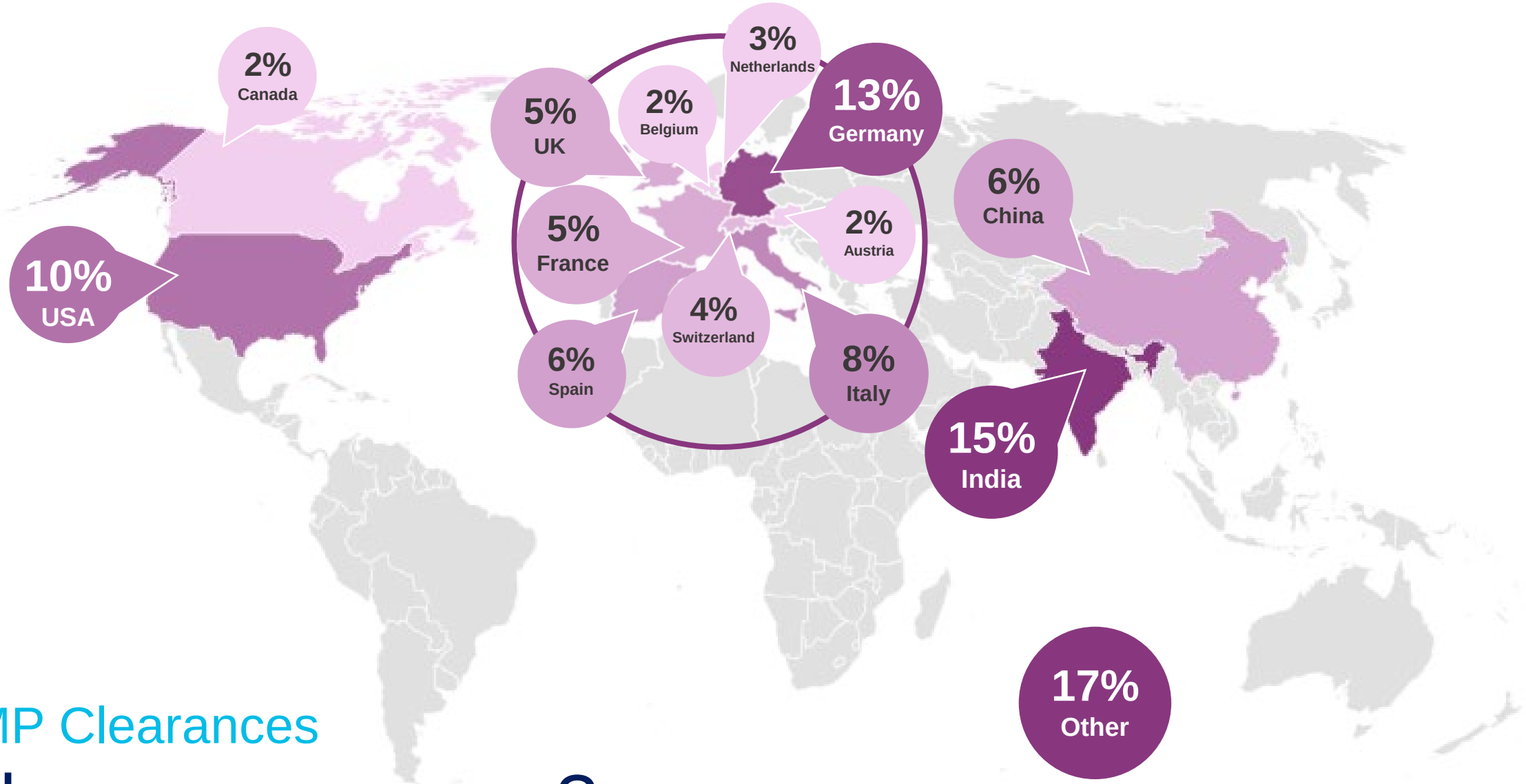
- Pandemic is not over for GMP
- ‘temporary’ arrangements introduced are still in use
- Long term effect on processes, evaluation complexity and timeframes
- Return to a new ‘normal’ will take a couple of years
- Unprecedented number of medicine shortages





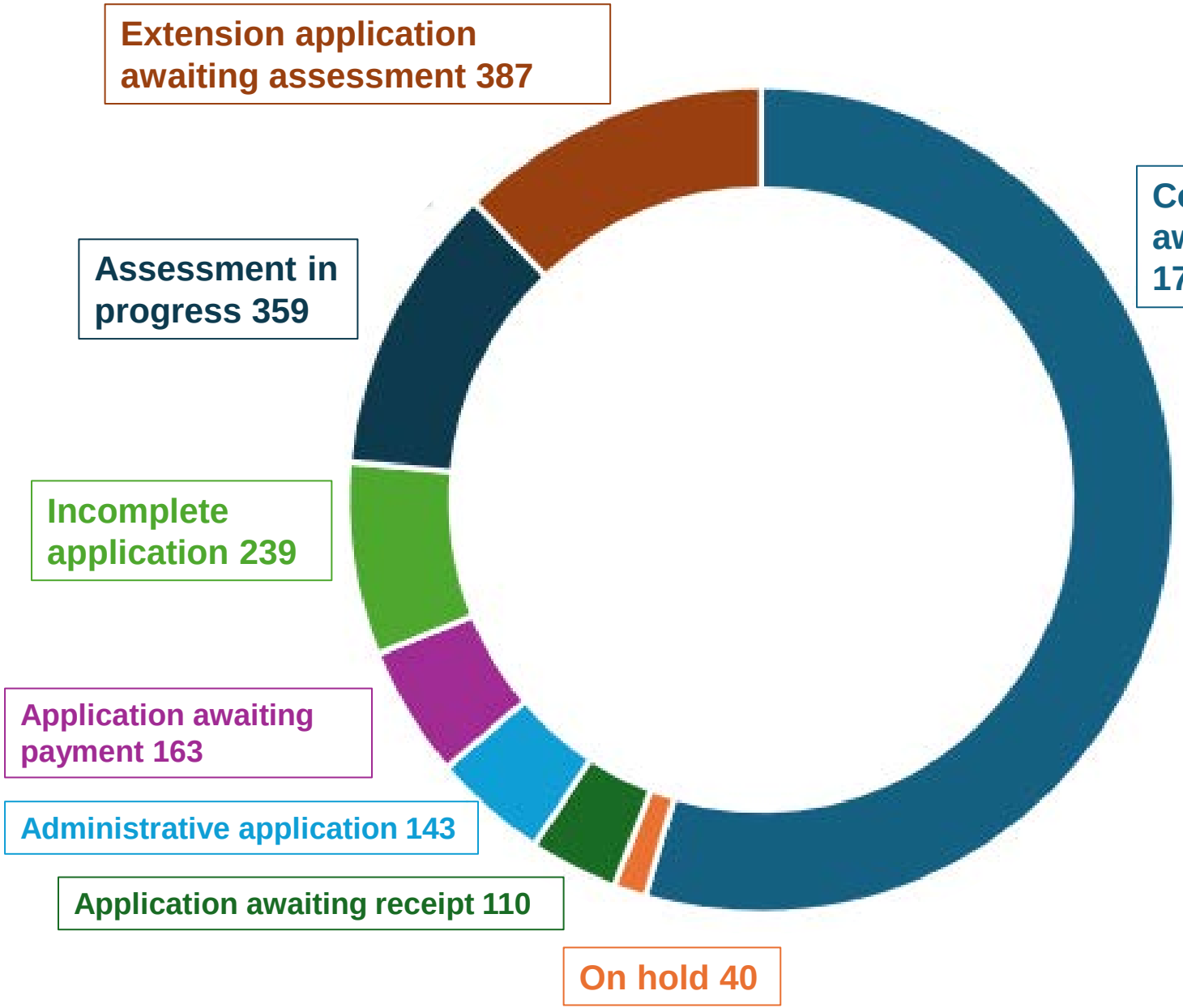
Overseas Sites

Where are we now?



GMP Clearances

Where are we now?



Where are we now?

Application breakdown

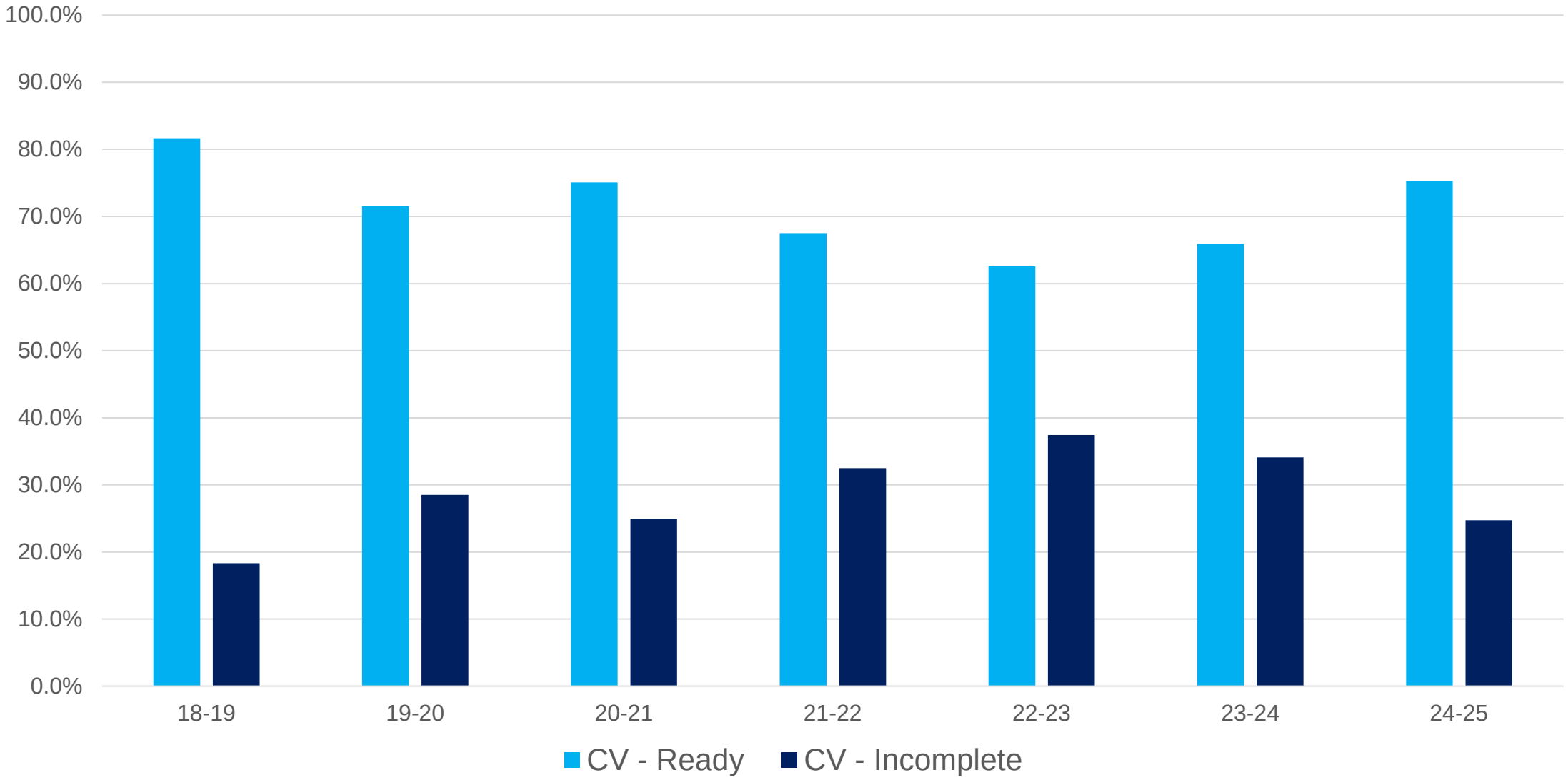
Where are we now?

Current situation

- MRAs, Extensions under control
- Backlogs in all Compliance Verification (CV) streams
- Significant increase in processing times
- Applications continue to be of poor quality
- Competing priorities across industry sectors

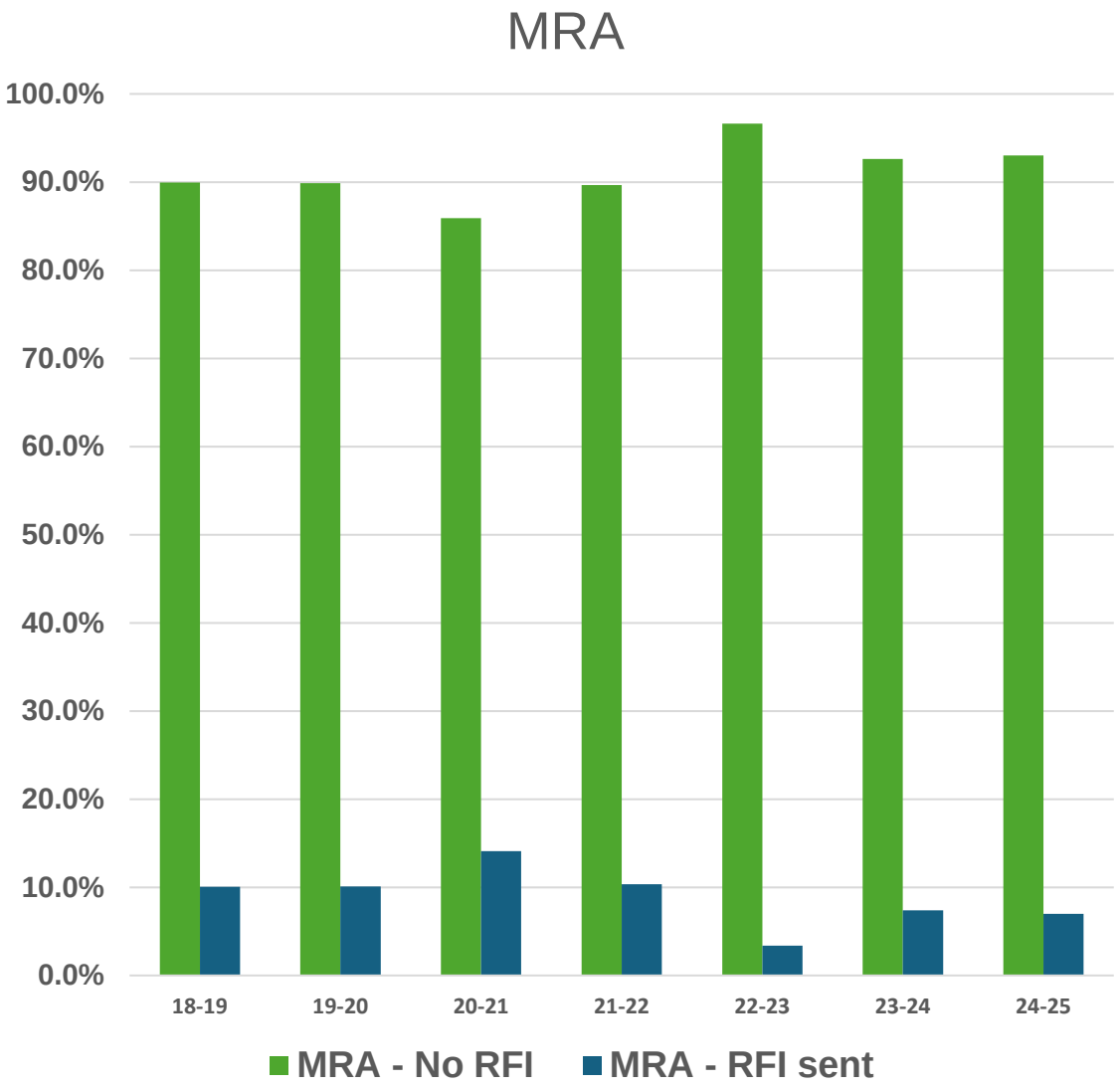
Where are we now?

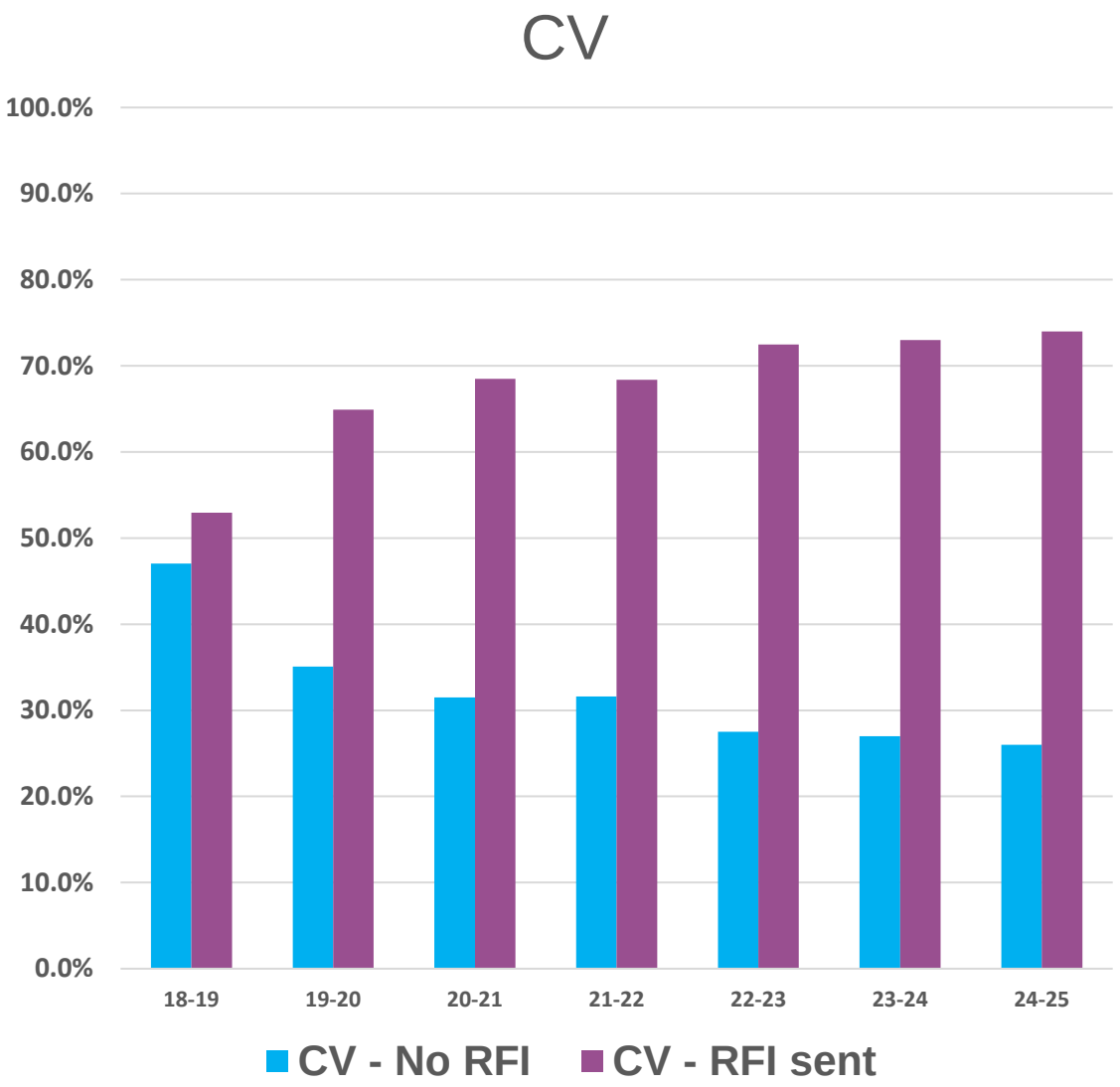
Incomplete applications



Where are we now?

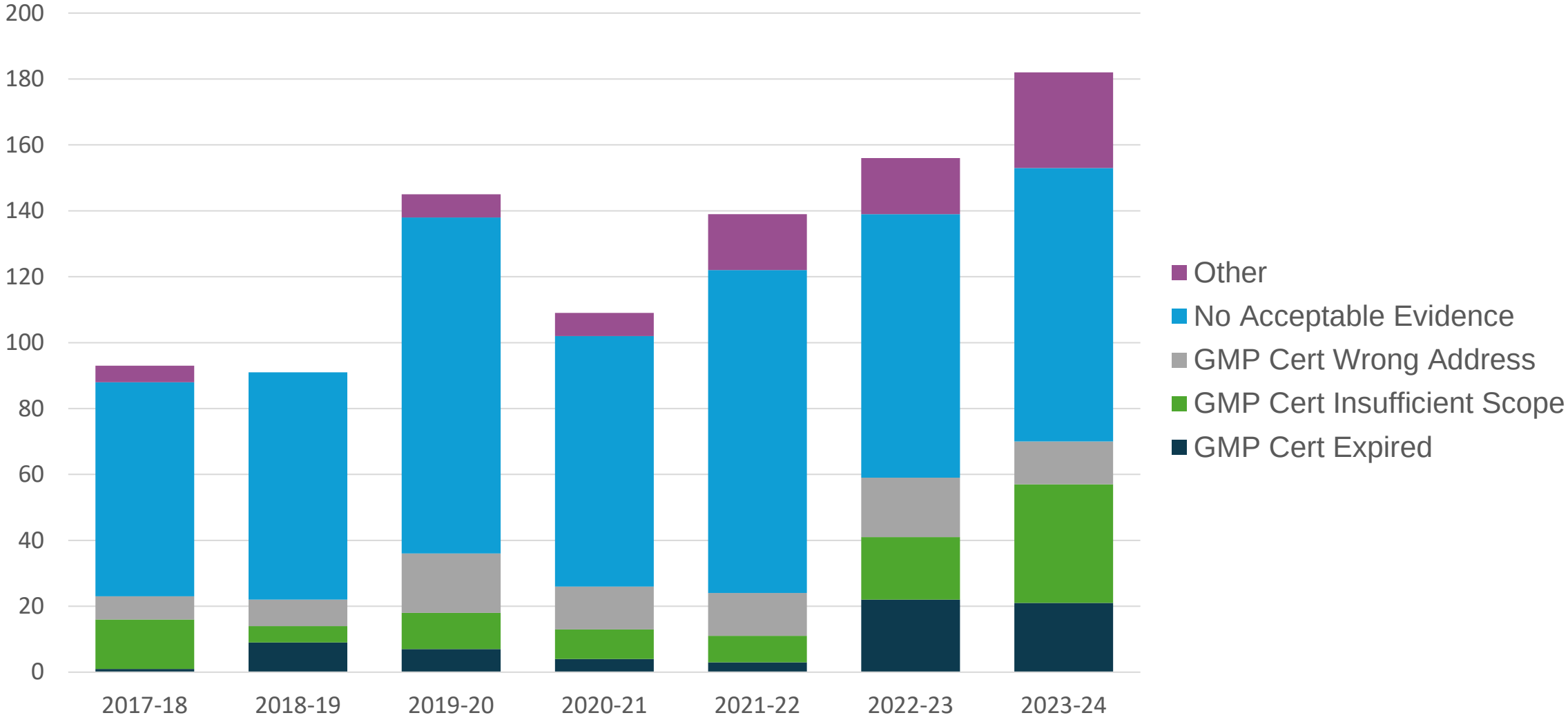
Requests for Information (RFI)





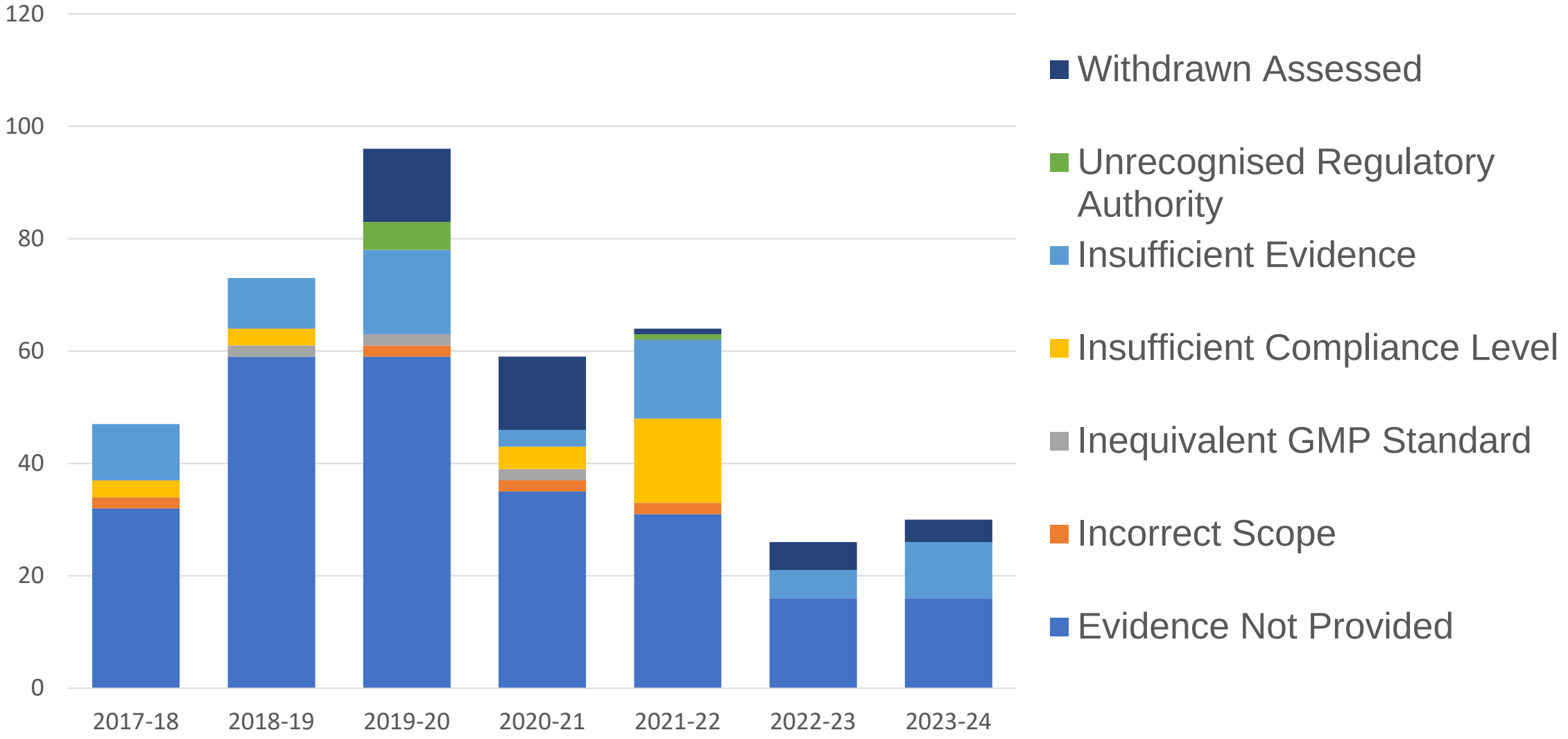
Where are we now?

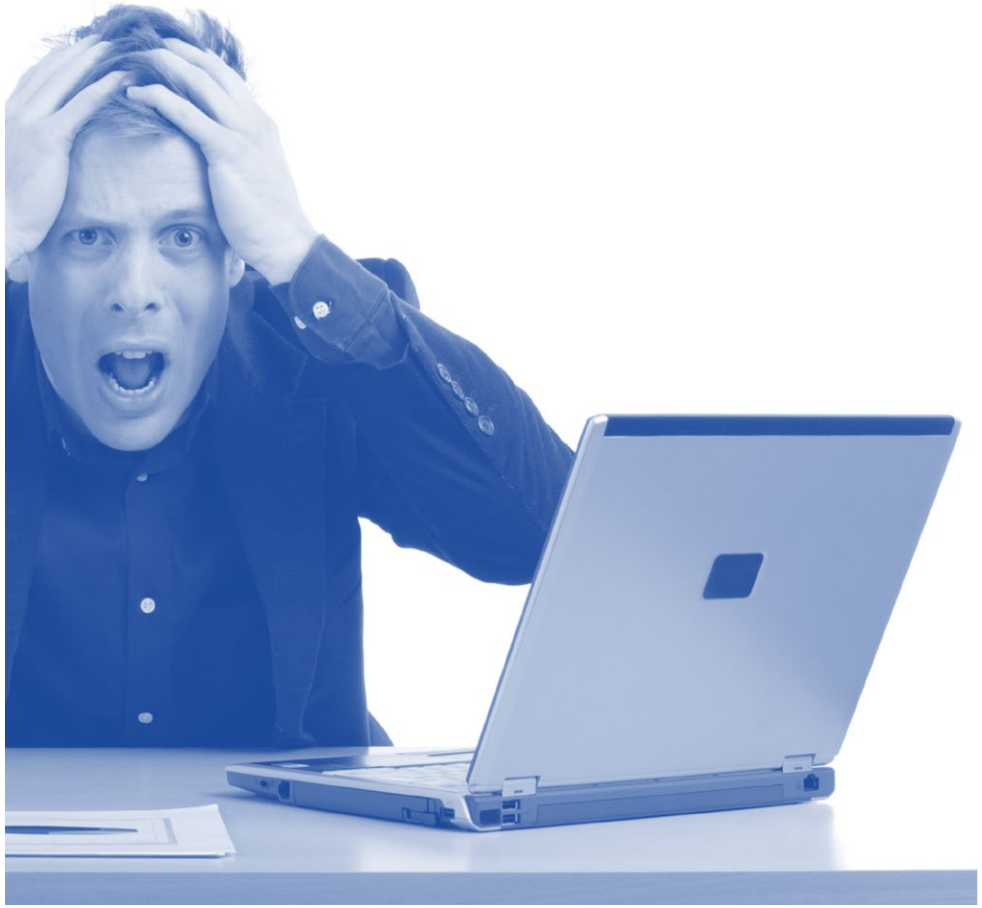
MRAs Not Issued



Where are we now?

CVs Not Issued





Where are we now?

Competing Priorities

- Medicine Shortages, Section 19A
- New listings (Complementary medicines and export only)
- Non-prescription medicines (OTC)
- Transfers of sponsorship
- COR-A, COR-B, priority and provisional pathways
- NCE, NBE, Project Orbis
- CAT3 variations
- International submissions (Access consortium)
- Medical devices

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Scenario

Ranking priorities – Round 1

The TGA has received 5 urgent requests from Sponsors to prioritise their GMP Clearance applications.

Rank the applications in order of priority to be evaluated with number 1 being the highest priority and number 5 being the lowest priority.

- **Sponsor 1 –** The GMP Clearance is required to allow the **listing of a new complementary medicine**. Not listing the medicine in the next few weeks will potentially put the company out of business. The Sponsor has indicated they have re-mortgaged their house to set-up the company to supply this product.
- **Sponsor 2** – The GMP Clearance is required to allow the submission of a **Non-prescription (Over the Counter) medicine application**. If the submission is not submitted in a few weeks, the company will miss out on a tender process to supply medicines nationwide in supermarkets and financially impact the company.
- **Sponsor 3** – The GMP Clearance is required to allow the submission of a **CAT 3 variation to add a new manufacturing site for fentanyl**. Delays with the variation will result in the sponsor reporting a potential medicine shortage notification.
- **Sponsor 4 –** The GMP Clearance is required to mitigate a reported **medicine shortage of oral antibiotic amoxicillin used to treat infections in children**.
- **Sponsor 5 –** The GMP Clearance is required for the delegate to make a decision on the **approval of a new cancer treatment (CAT 1) application** that has already received positive outcome from the Advisory Committee on Medicines (ACM).

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Scenario

Ranking priorities – Round 2

The TGA has received 5 urgent requests from Sponsors to prioritise their GMP Clearance applications.

Rank the applications in order of priority to be evaluated with number 1 being the highest priority and number 5 being the lowest priority.

- **Sponsor 1 –** The GMP Clearance is required to allow the **listing of a new complementary medicine**. Not listing the medicine in the next few weeks will potentially put the company out of business. The Sponsor has indicated they have re-mortgaged their house to set-up the company to supply this product.
- **Sponsor 2** – The GMP Clearance is required to allow the submission of a **Non-prescription (Over the Counter) medicine application**. If the submission is not submitted in a few weeks, the company will miss out on a tender process to supply medicines nationwide in supermarkets and financially impact the company.
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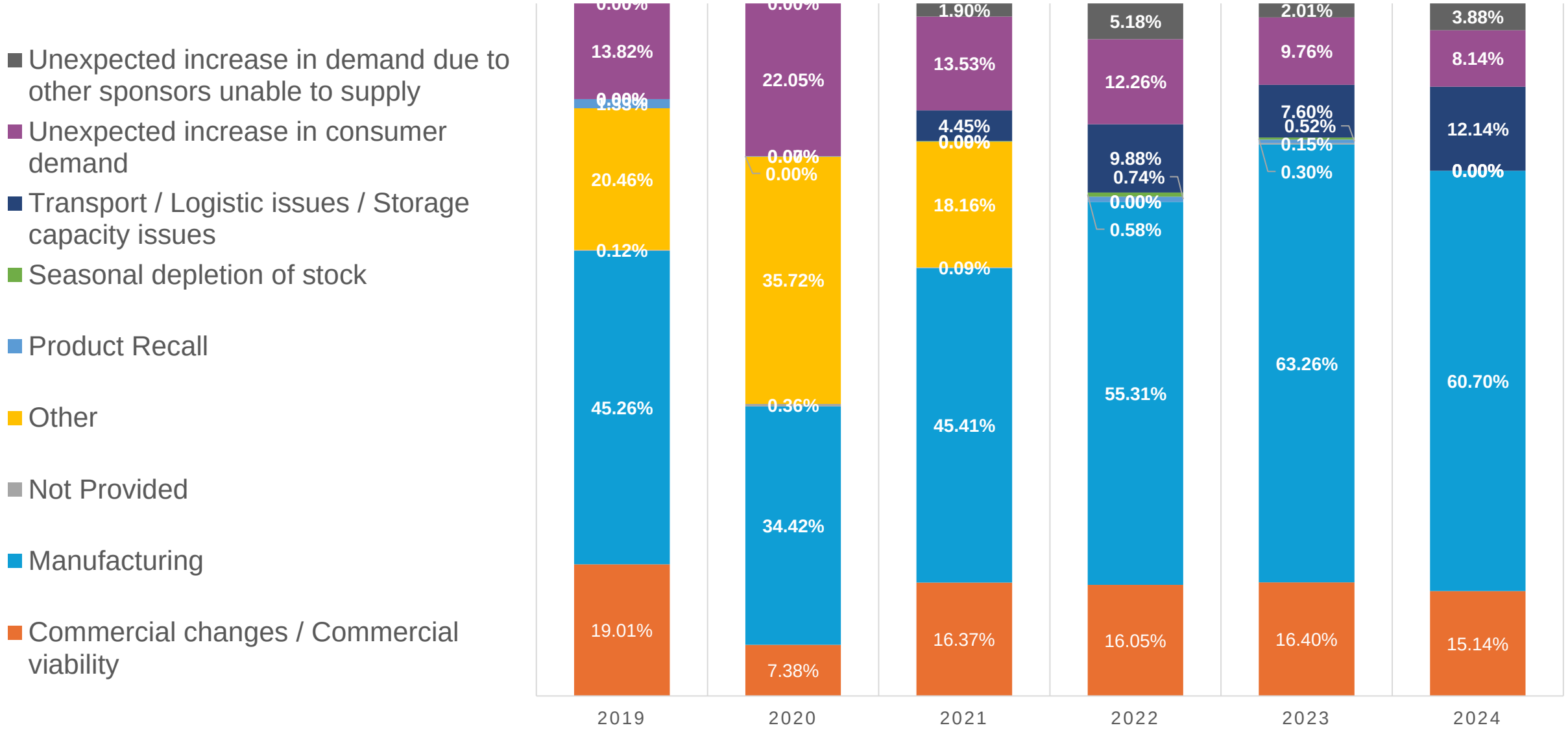
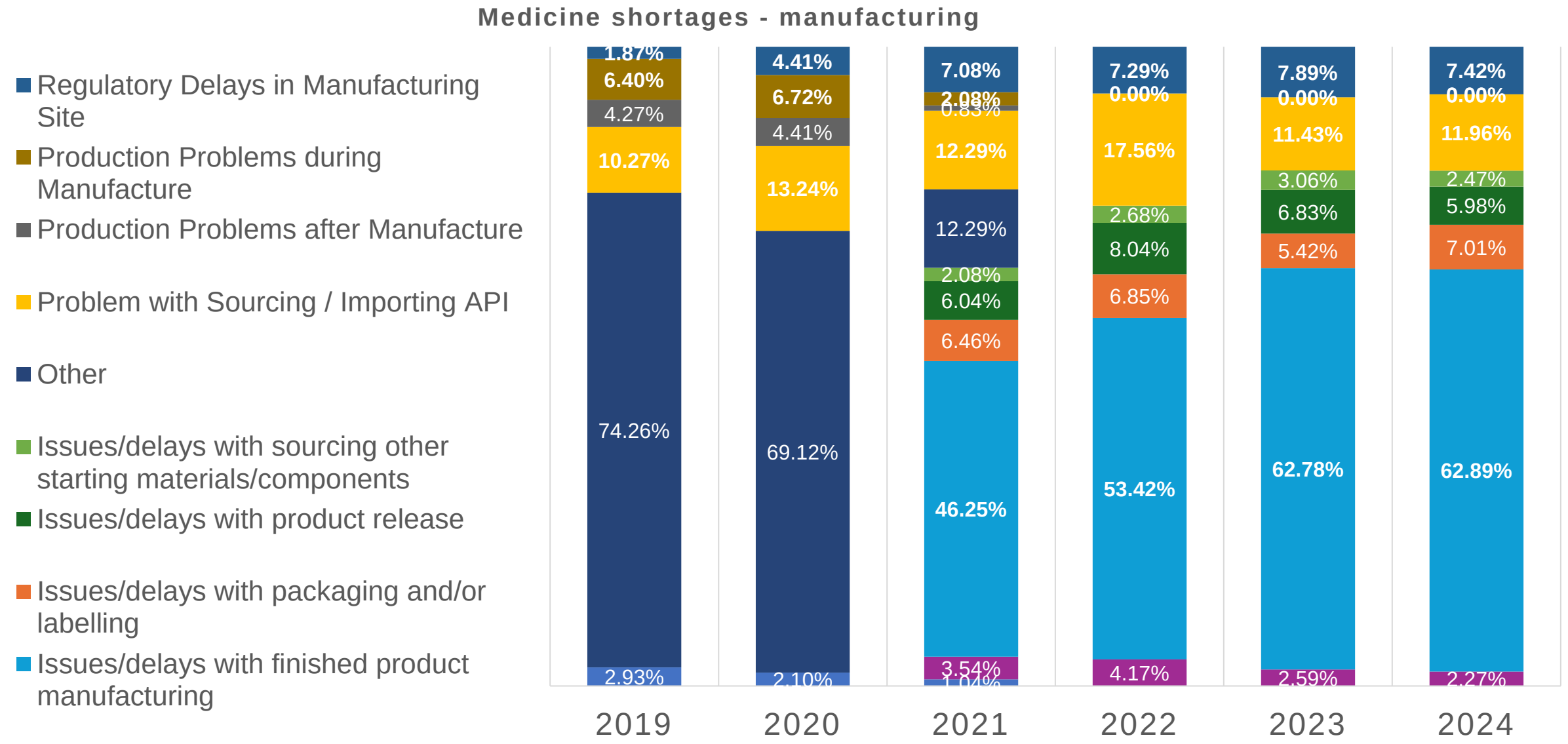
Where are we now?

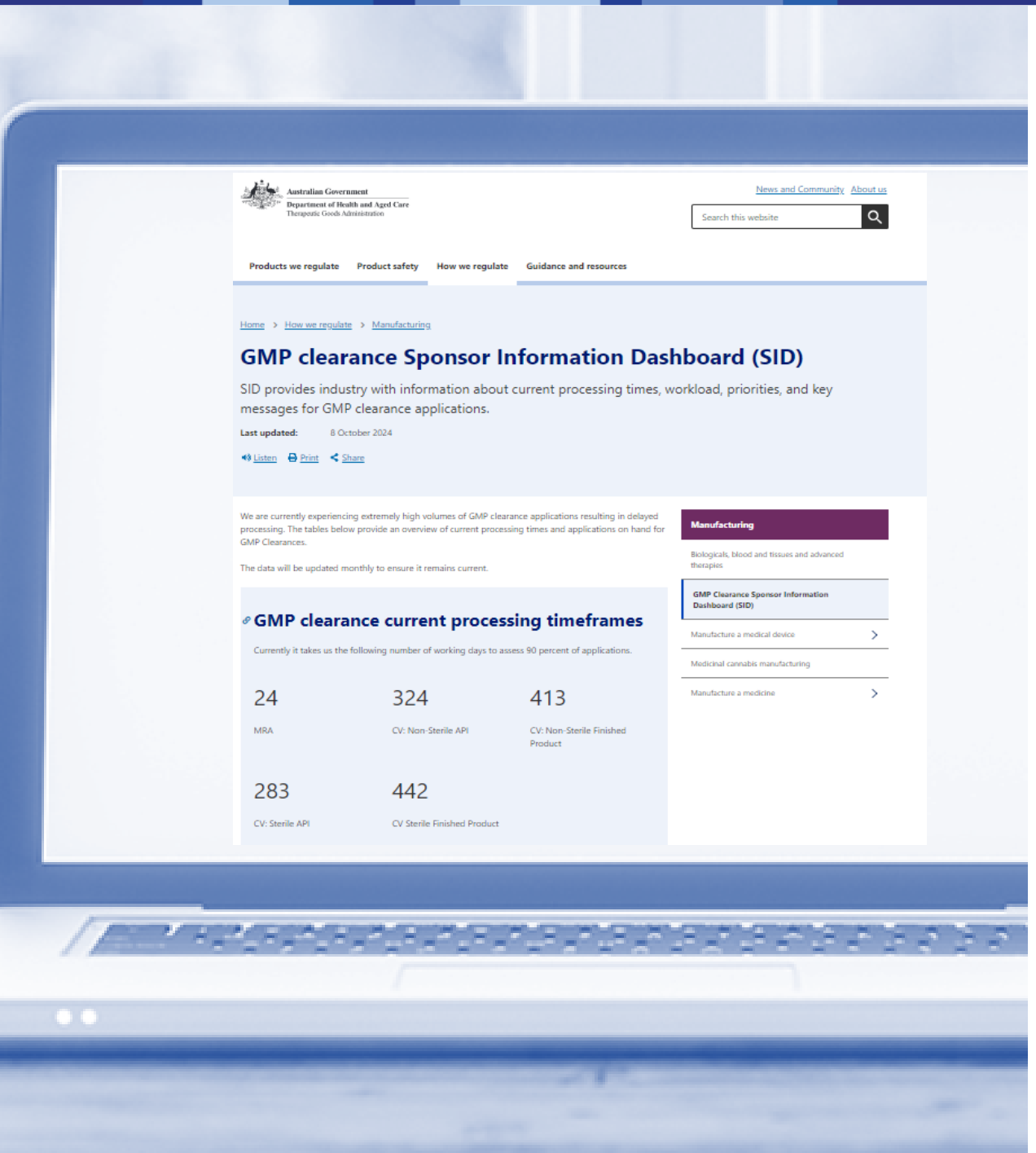
Medicine Shortages



Where are we now?

Medicine Shortages





Where are we now?

Sponsor Information Dashboard

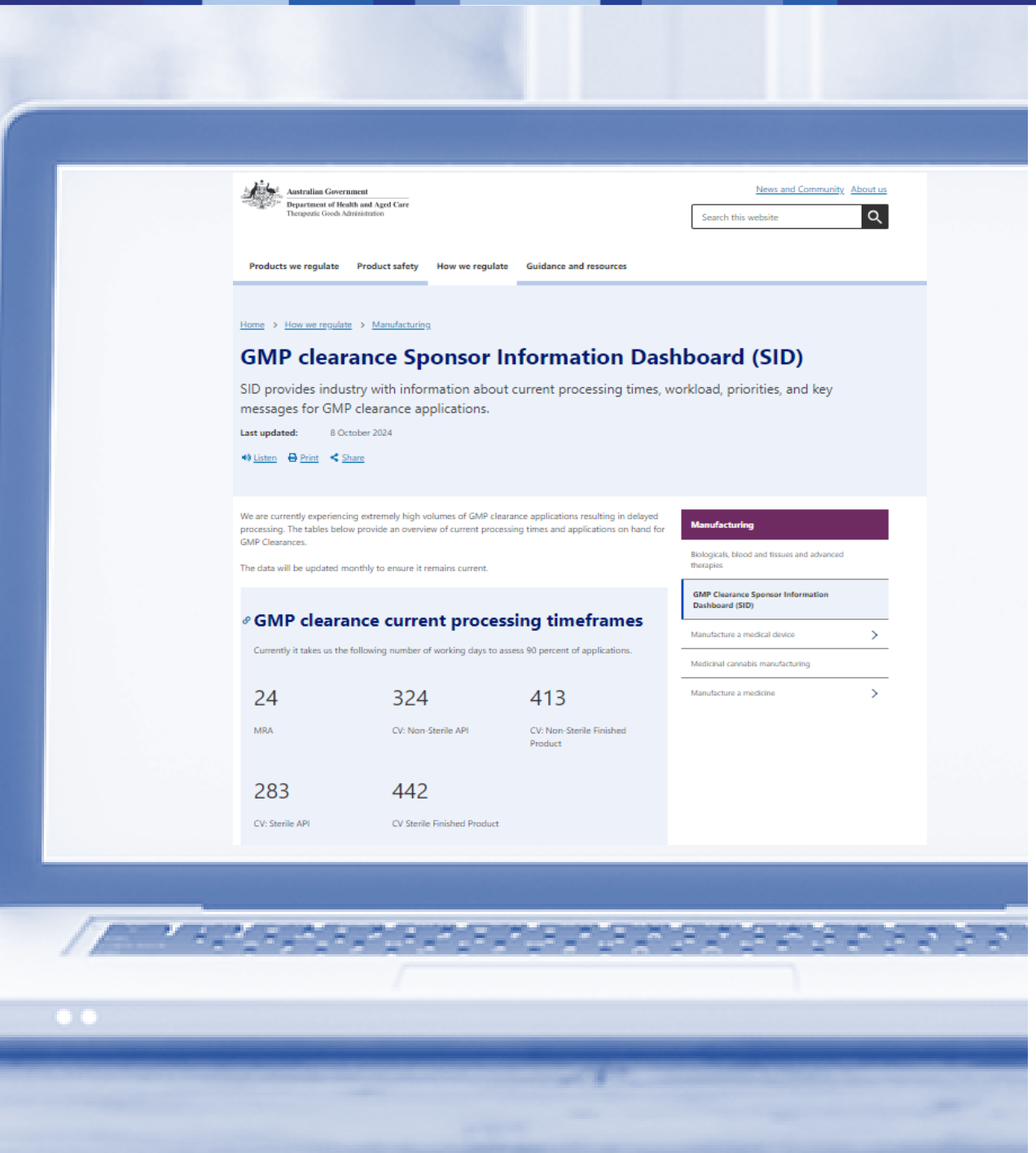
Removed ‘target’ timeframes not being met

Replaced with Monthly update of actual processing data

3 month rolling data - 90th percentile

Transparency of work on hand and application breakdown

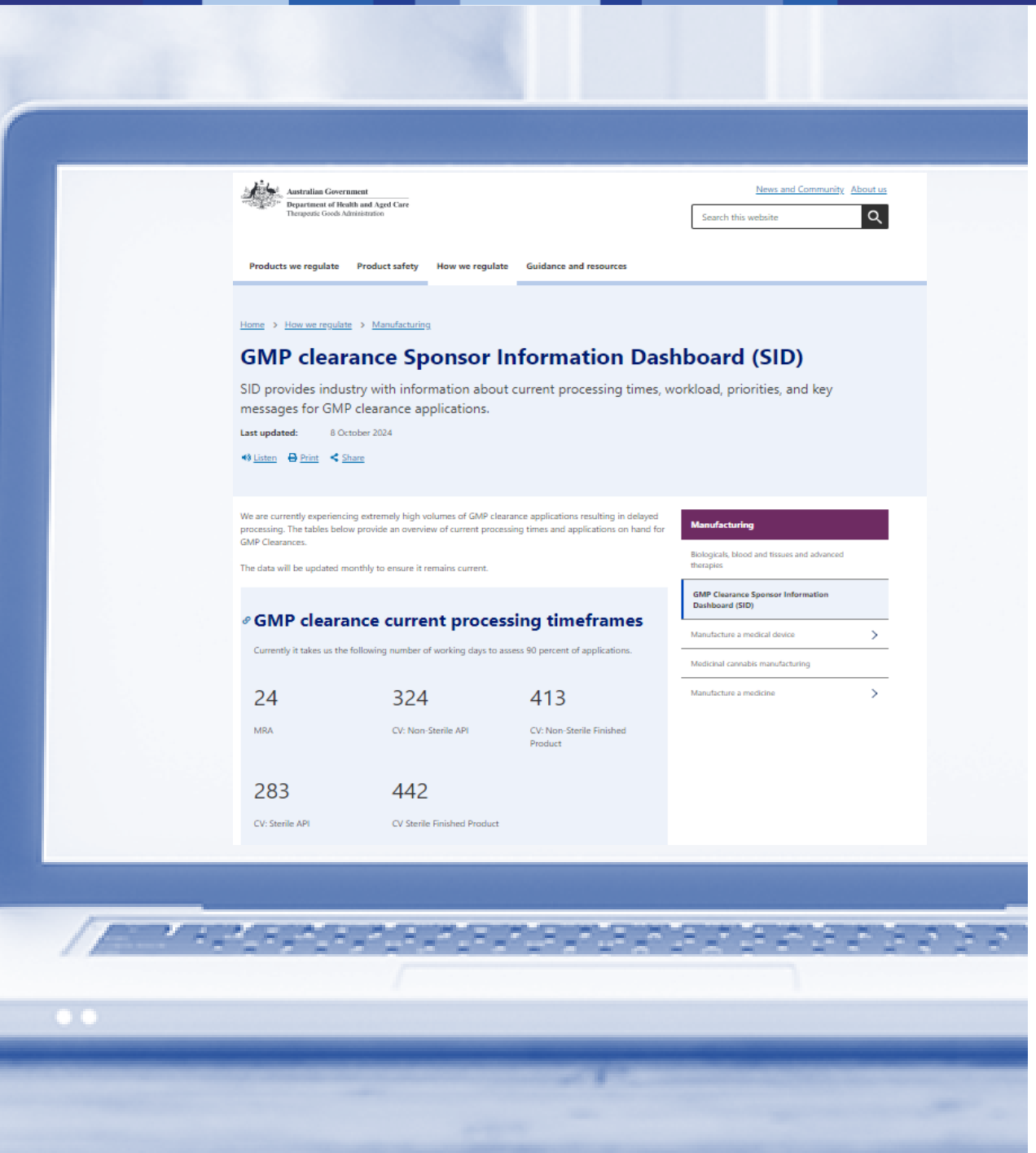
Information required when requesting prioritisation



Word cloud

Do you find the Sponsor Information Dashboard (SID) useful?

Scan the QR code with your device to participate in this activity



Word cloud

What other information would you like to see on the Sponsor Information Dashboard (SID)?

Noting there are limitations to data that can be published due to website accessibility requirements.

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Where are we now?

Delivering long term strategic benefits

Adding more countries to MRA pathway

Collaboration with international regulatory partners to:

Update existing agreements

Create new agreements

Promoting greater inspection reliance

Pilot exciting new initiatives

Where we are headed

Where we are headed

Removing the backlog…..again

Streamlined onboarding & training of GMP evaluators

Take same proven approach as 2016 backlog

Continue to deliver long-term strategic goals

Digital transformation

Where we are headed

GMP Clearance Reforms – Why they're needed

- Framework has not changed since 2011
- Increasing application volumes
- GMP and regulatory framework has evolved
- Pandemic has changed the GMP landscape
- Need to review of every aspect of the GMP Clearance framework

IT systems and process

Legislation and policy

Fees and cost recovery

GMP Clearance Reforms

- Broad long-term reform agenda covering all aspects of the GMP Clearance framework
- Several intertwining dependencies
- Industry consultation through GMP Clearance Reforms Working Group (RWG)
- Internal and public consultations as required

Where we are headed

IT systems and process

Improved e-forms and validation

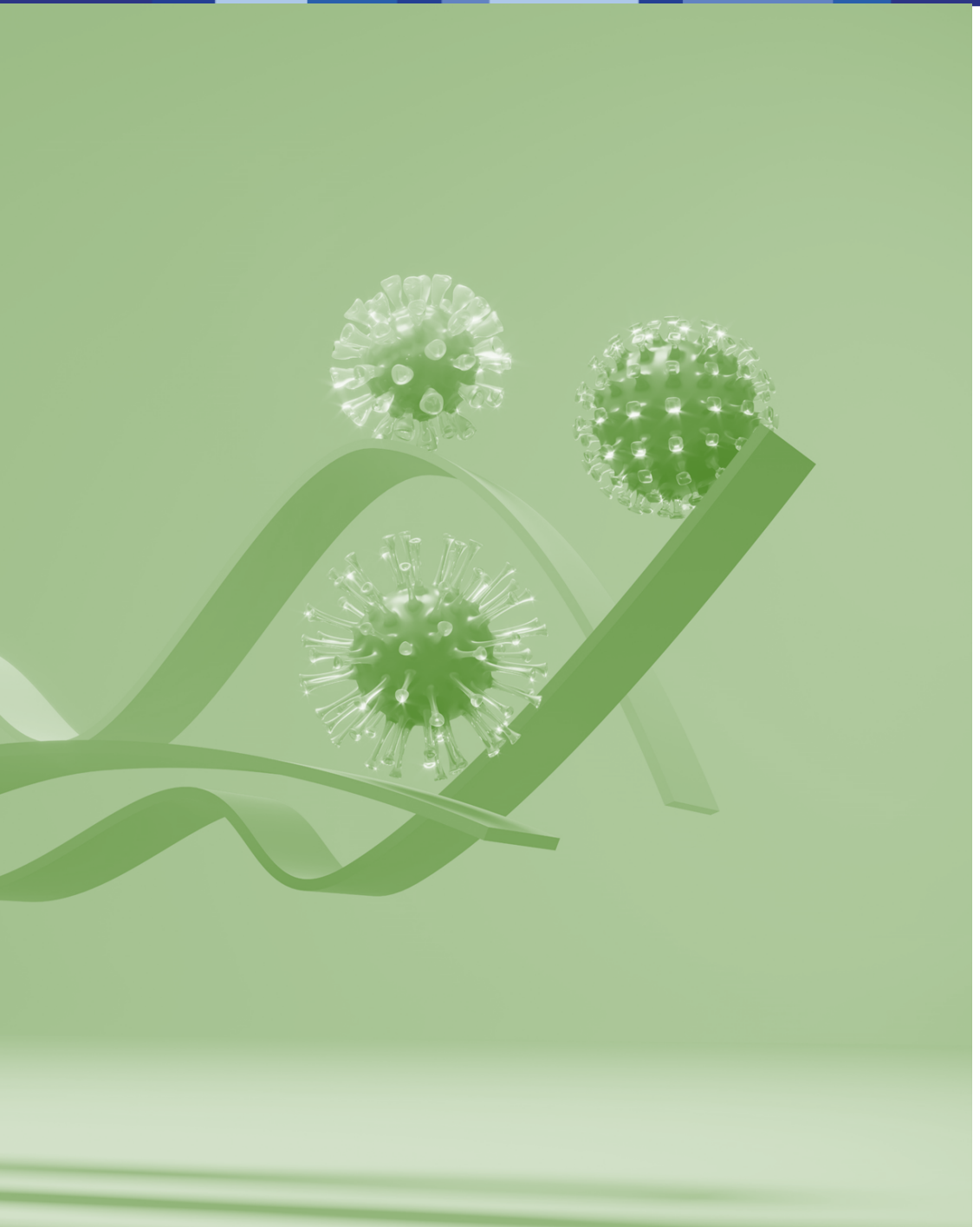
Better data collection and product lodgement system integration

Overseas manufacturer access to new portal

Better management of Letters of Access (LoA)

Transparency on application workflow and status throughout process

Notifications through portal



Where are we going?

Legislation, policy, fees and cost recovery

- Review of existing legislation underway
- Any proposed change would require significant consultation
- Review of policy positions to be performed in 2025
- Fees outlined in Therapeutic Goods Regulations 1990 are outdated and don’t reflect effort
- Cost-recovery model needs review

Where we are headed

GMP Clearance Reforms Working Group

- **Consists of 6 peak bodies:**
  - Complementary Medicines Australia (CMA)
  - Generic and Biosimilar Medicines Association (GBMA)
  - Medicines Australia (MA)
  - Consumer Healthcare Products (CHP) Australia
  - Association of Therapeutic Goods Consultants (ATGC)
  - Australian Medicinal Cannabis Association (AMCA)
- **Current work - IT and Process**

Word cloud

What would you like to see in future?

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Questions?

Hit me!

Scan the QR code with your device to participate in this activity

GMP FORUM 2024

Australian Government

Department of Health and Aged Care

Therapeutic Goods Administration