

PIC/S: TGA's Adoption Process and Future Revisions

Matt Davis
Manufacturing Quality Branch
Department of Health and Aged Care, TGA



GMP FORUM 2024



Australian Government
Department of Health and Aged Care
Therapeutic Goods Administration

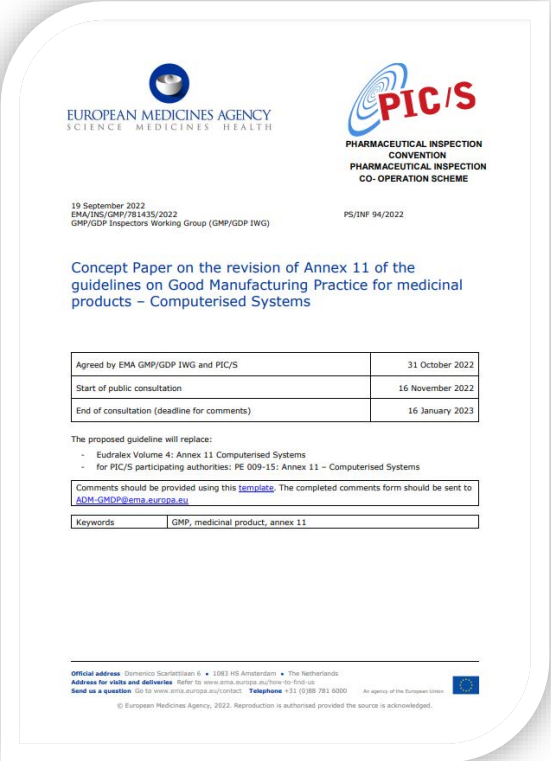
[tga.gov.au](https://www.tga.gov.au)

Why adopt the latest PIC/S Guide to GMP?

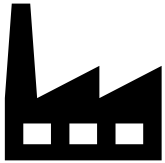
- Patient Safety – Product Quality
 - Mitigate risks to product quality
 - Ambiguity leading to misinterpretation and compliance risks
- International reputation
- Relevant to our Mutual Recognition Agreements
- Provides assurance of equivalence to international markets
 - Reduces regulatory burden
- Continuous Improvement



GMP Guide Update Process



TGA

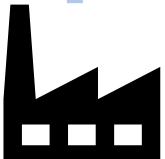


Agreed by EMA GMP/GDP IWG and PIC/S	31 October 2022
Start of public consultation	16 November 2022
End of consultation (deadline for comments)	16 January 2023

The proposed guideline will replace:

- Eudralex Volume 4: Annex 11 Computerised Systems
- for PIC/S participating authorities: PE 009-15: Annex 11 – Computerised Systems

Comments should be provided using this [template](#). The completed comments form should be sent to ADM-GMDP@ema.europa.eu



TGA

- TIWGG**
Accord
- Active Pharmaceutical Ingredient Manufacturer's Association of Australia (APIMAA)
 - Association of Therapeutic Goods Consultants Inc (ATGC)
 - Australia and New Zealand Region of International Society of Cell and Gene Therapy (ISCT)
 - Australia New Zealand Industrial Gas Association (ANZIGA)
 - Australian Red Cross Lifeblood (Lifeblood)
 - Biotherapeutics Association of Australasia (BAA)
 - Complementary Medicines Australia (CMA)
 - Consumer Healthcare Products (CHP) Australia
 - Generic and Biosimilar Medicines Association (GBMA)
 - Medicinal Cannabis Industry Association (MCIA)
 - Medicines Australia (MA)
 - Australian Medicinal Cannabis Association (AMCA)

Current revisions of PE009

Annex 1 – Sterile Medicines

- Adopted by PIC/S in PE009-17 (Aug 2023)
- Add ICH Q9, Q10 principles
- Address advances in technology
- Provide clear interpretation of GMP expectations

Chapter 4 - Documentation

- Address modern methods for record keeping
- Incorporate Data Integrity and Data Management

Annex 11 – Computerised Systems

- Incorporate Data Integrity and Data Management
- Add ICH Q9, Q10 principles
- Include evaluation and management of services, e.g. cloud services
- Retention of knowledge
- Classification guidance for critical systems and critical data
- System security – physical and electronic

Annex 4 - Veterinary medicinal products other than immunologicals

- Current version written 1992
- Updates required to incorporate contemporary GMP
- Align with Ch 3/5 for x-contamination
- I(V)MP
- Implement ICH Q8, 9, 10 11 and VICH guidance
- Extend concepts to include new areas of technology, new products, new processing methods
- Address ambiguity
- Tailored to VET (batch sizes, large volumes)

Annex 5 - Manufacture of immunological veterinary medicinal products

- As per Annex 4
- Address ATMP, bloods, cell therapy, gene therapy, animal extracted products, allergen products and biotech products

Annex 1 – Sterile Medicines

- Adopted by PIC/S in PE009-17 (Aug 2023)
- Add ICH Q9, Q10 principles
- Address advances in technology
- Provide clear interpretation of GMP expectations

Chapter 4 - Documentation

- Address modern methods for record keeping
- Incorporate Data Integrity and Data Management

Annex 11 Computerised Systems

- Incorporate Data Integrity and Data Management
- Add ICH Q9, Q10 principles
- Include evaluation management of services, e.g. cloud services
- Retention of knowledge
- Classification guide for critical systems and critical data
- System security - physical and electronic

Annex 1 – Sterile Medicines

- Adopted by PIC/S in PE009-17 (Aug 2023)
- Add ICH Q9, Q10 principles
- Address advances in technology
- Provide clear interpretation of GMP expectations

Chapter 4 - Documentation

- Address modern methods for record keeping
- Incorporate Data Integrity and Data Management

Annex 11 – Computerised Systems

- Incorporate Data Integrity and Data Management
- Add ICH Q9, Q10 principles
- Include evaluation and management of services, e.g. cloud services
- Retention of knowledge
- Classification guidance for critical systems and critical data
- System security – physical and electronic

Annex 4 - Veterinary medicinal products other than immunological

- Current version v 1992
- Updates required to incorporate contemporary GMP
- Align with Ch 3/5 contamination
- I(V)MP
- Implement ICH Q9, Q10, Q11 and VICH Q11 guidance
- Extend concepts to include new areas of technology, new products, new processing methods
- Address ambiguity
- Tailored to VET (small sizes, large volumes)

Annex 1 – Sterile Medicines

Approved by PIC/S in 2019-17 (Aug 2023)
ICH Q9, Q10
Addresses advances in technology
Provides clear interpretation of GMP expectations

Chapter 4 - Documentation

- Address modern methods for record keeping
- Incorporate Data Integrity and Data Management

Annex 11 – Computerised Systems

- Incorporate Data Integrity and Data Management
- Add ICH Q9, Q10 principles
- Include evaluation and management of services, e.g. cloud services
- Retention of knowledge
- Classification guidance for critical systems and critical data
- System security – physical and electronic

Annex 4 - Veterinary medicinal products other than immunologicals

- Current version written 1992
- Updates required to incorporate contemporary GMP
- Align with Ch 3/5 for x-contamination
- I(V)MP
- Implement ICH Q8, 9, 10 11 and VICH guidance
- Extend concepts to include new areas of technology, new products, new processing methods
- Address ambiguity
- Tailored to VET (batch sizes, large volumes)

Annex 5 - Manufacture of immunological veterinary medicinal products

- As per Annex 4
- Address ATMP, biologic cell therapy, gene therapy, animal extracted products, allergen products, biotech products

Chapter 4 - Documentation

Assess modern
tools for record
keeping

Incorporate Data
Integrity and Data
Management

Annex 11 – Computerised Systems

- Incorporate Data Integrity and Data Management
- Add ICH Q9, Q10 principles
- Include evaluation and management of services, e.g. cloud services
- Retention of knowledge
- Classification guidance for critical systems and critical data
- System security – physical and electronic

Annex 4 - Veterinary medicinal products other than immunologicals

- Current version written 1992
- Updates required to incorporate contemporary GMP
- Align with Ch 3/5 for x-contamination
- I(V)MP
- Implement ICH Q8, 9, 10 11 and VICH guidance
- Extend concepts to include new areas of technology, new products, new processing methods
- Address ambiguity
- Tailored to VET (batch sizes, large volumes)

Annex 5 - Manufacture of immunological veterinary medicinal products

- As per Annex 4
- Address ATMP, bloods, cell therapy, gene therapy, animal extracted products, allergen products and biotech products

Annex 11 – Computerised Systems

Integrate Data
Quality and Data
Management
ICH Q9, Q10
Risk
Evaluation and
Management of
Systems, e.g. cloud
Systems
Evolution of knowledge
Validation guidance
IT systems and
data
Security –
IT and electronic

Annex 4 - Veterinary medicinal products other than immunologicals

- Current version written 1992
- Updates required to incorporate contemporary GMP
- Align with Ch 3/5 for x-contamination
- I(V)MP
- Implement ICH Q8, 9, 10 11 and VICH guidance
- Extend concepts to include new areas of technology, new products, new processing methods
- Address ambiguity
- Tailored to VET (batch sizes, large volumes)

Annex 5 - Manufacture of immunological veterinary medicinal products

- As per Annex 4
- Address ATMP, bloods, cell therapy, gene therapy, animal extracted products, allergen products and biotech products

Current revisions of PE009

Annex 1 – Sterile Medicines

- Adopted by PIC/S in PE009-17 (Aug 2023)
- Add ICH Q9, Q10 principles
- Address advances in technology
- Provide clear interpretation of GMP expectations

Chapter 4 - Documentation

- Address modern methods for record keeping
- Incorporate Data Integrity and Data Management

Annex 11 – Computerised Systems

- Incorporate Data Integrity and Data Management
- Add ICH Q9, Q10 principles
- Include evaluation and management of services, e.g. cloud services
- Retention of knowledge
- Classification guidance for critical systems and critical data
- System security – physical and electronic

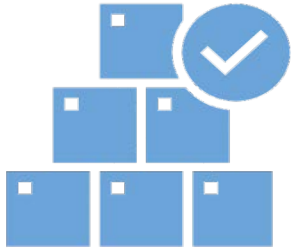
Annex 4 - Veterinary medicinal products other than immunologicals

- Current version written 1992
- Updates required to incorporate contemporary GMP
- Align with Ch 3/5 for x-contamination
- I(V)MP
- Implement ICH Q8, 9, 10 11 and VICH guidance
- Extend concepts to include new areas of technology, new products, new processing methods
- Address ambiguity
- Tailored to VET (batch sizes, large volumes)

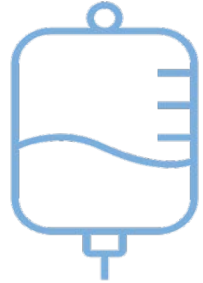
Annex 5 - Manufacture of immunological veterinary medicinal products

- As per Annex 4
- Address ATMP, bloods, cell therapy, gene therapy, animal extracted products, allergen products and biotech products

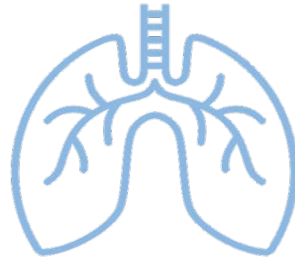
Future revisions of PE009



Chapter 1
PQS



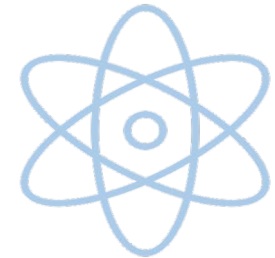
Annex 3
Radiopharmaceuticals



Annex 6
Medicinal Gases



Annex 15
Qualification &
Validation



Annex 12
Use of ionising
radiation

Summary

- Reviews of PE009-17 commenced
- TGA continues to work with industry on adoption of future changes
- Multiple changes anticipated in future
- Get involved!
 - PIC/S – EC Feedback
 - TGA/TIWGG Feedback



Questions?



Scan this QR code with your device to submit a question



GMP FORUM 2024



Australian Government

Department of Health and Aged Care
Therapeutic Goods Administration