

# Submitting Effective GMP Clearance Applications

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## GMP FORUM 2024



Australian Government  
Department of Health and Aged Care  
Therapeutic Goods Administration

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

# Agenda

- What are effective applications?
- How to submit an application
- Variation applications
- Evidence
- Questions

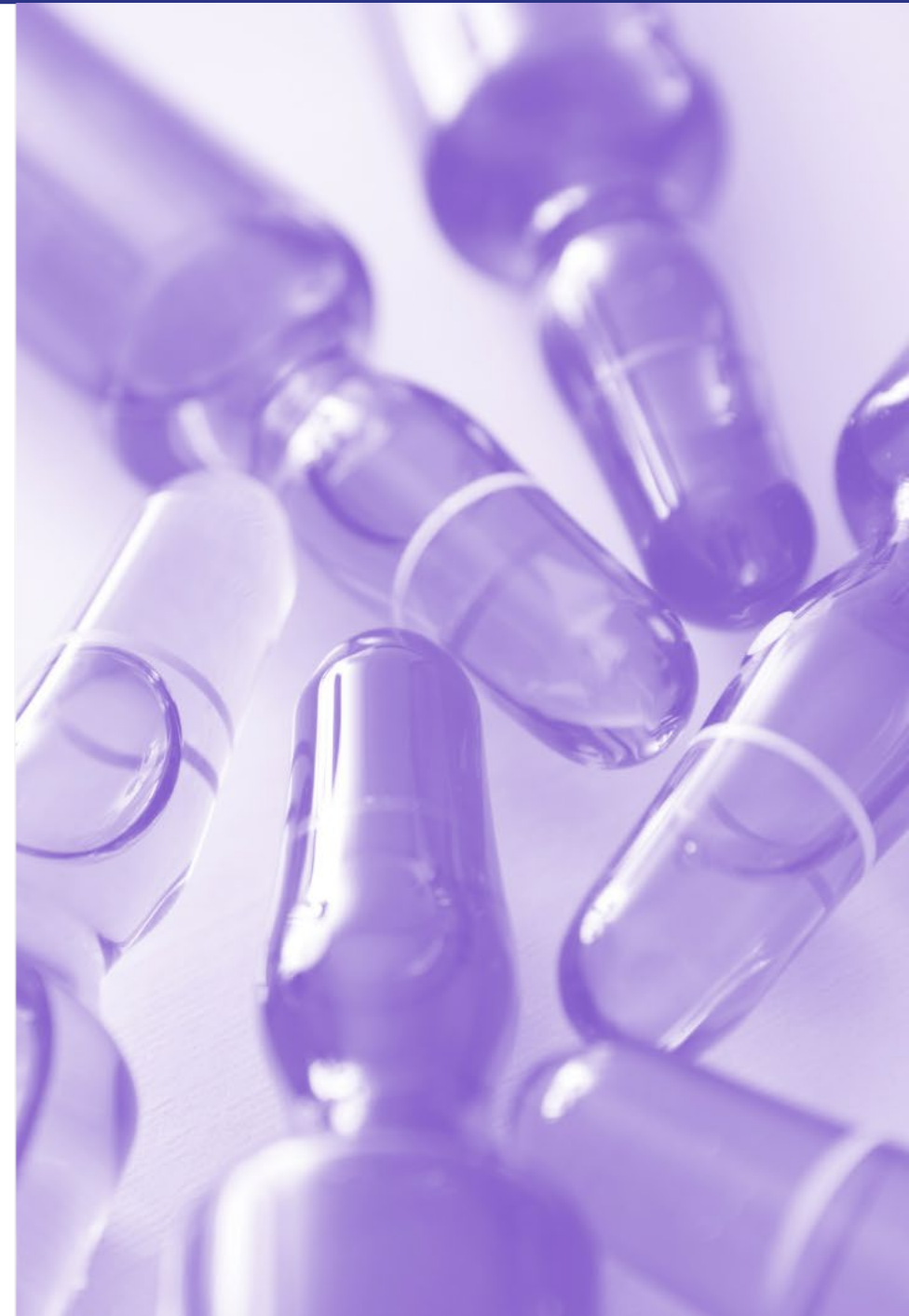
# Introduction

Good Manufacturing Practice (GMP) Clearances are used:

- For overseas manufacturing sites
- To verify compliance with principles of GMP
- Support registration or listing on the ARTG
- Sponsors are responsible for obtaining and maintaining clearances

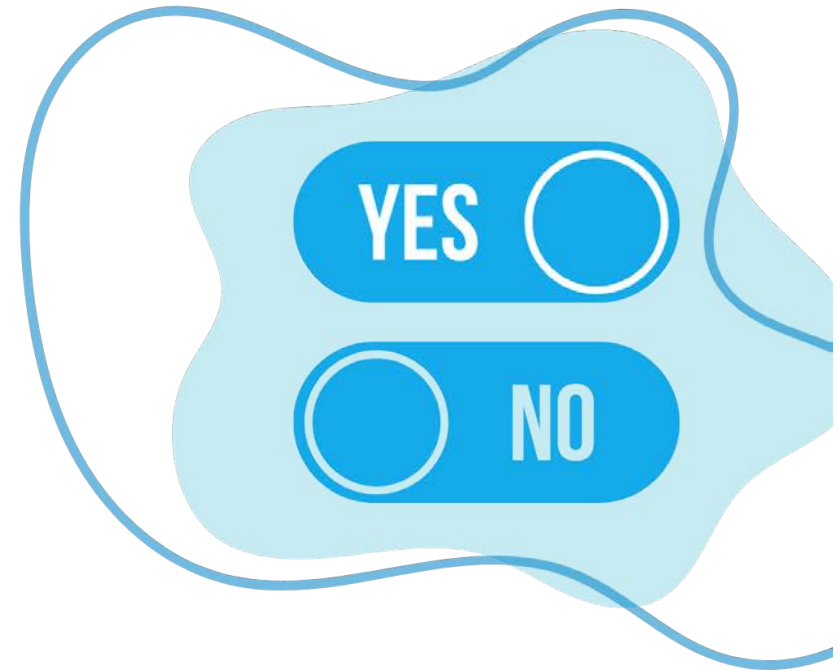
Sponsors can apply for a GMP Clearance using one of the three pathways:

- Mutual Recognition Agreement (MRA) pathway
- Compliance Verification (CV) pathway
- An inspection by the TGA



# What is an Effective Application?

- It is complete and contains all relevant information
- Appropriate fees have been paid (no additional invoices need to be raised)
- The correct scope has been selected
- All required evidence is submitted



Effective applications progress through the receipting and assessment process without having a stop clock applied (status 'with manufacturer')

# Mutual Benefits of Submitting an Effective Application

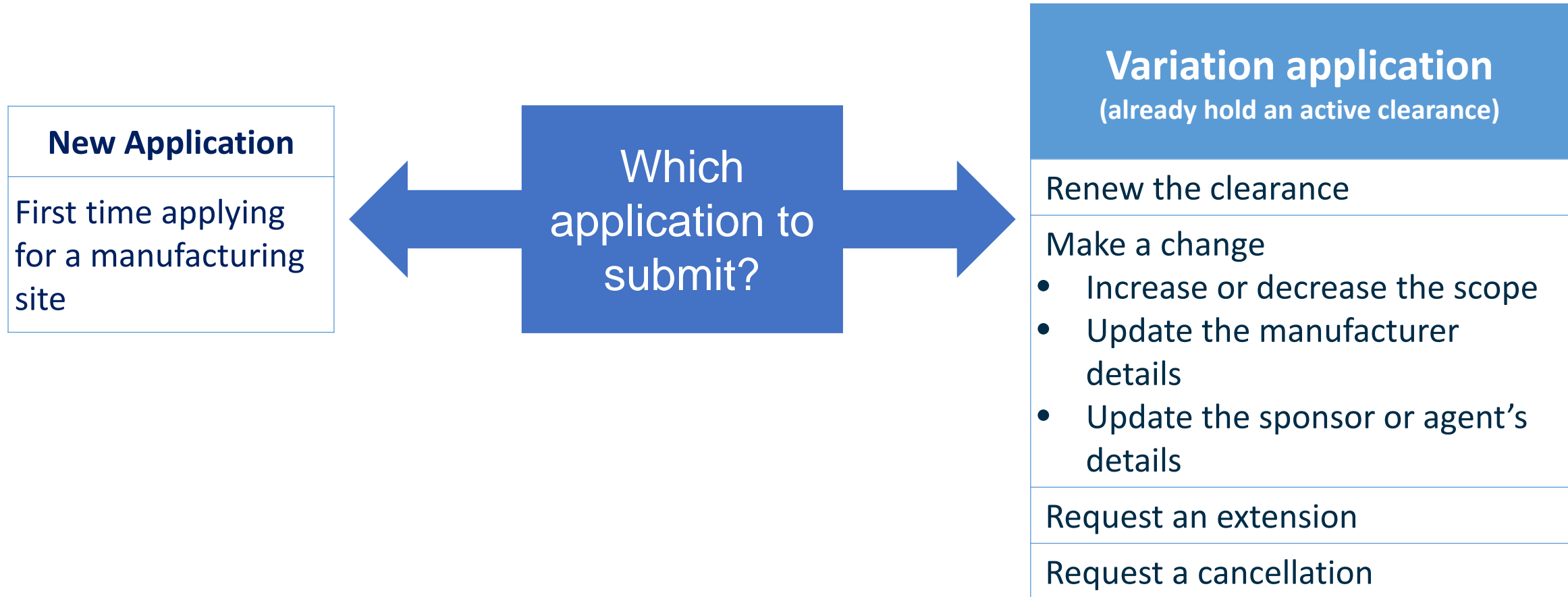
## Industry

- Avoid unnecessary delays
  - Invoices and payments
  - Evidence and RFIs
- Avoid updating your ARTG entries by maintaining the original GMP Clearance number
- Prevent validation issues with the regulatory submission system
- Get the maximum clearance validity (where possible)
- Save money

## TGA

- Reduction of manual invoicing
- Reduce risk of impact to registrations
- Reallocate resources for process improvements
- Reduce number of 'not issued' clearances
- Reduces the number of RFIs which need to be sent

# How to Submit an Application



# Submitting a New GMP Clearance Application

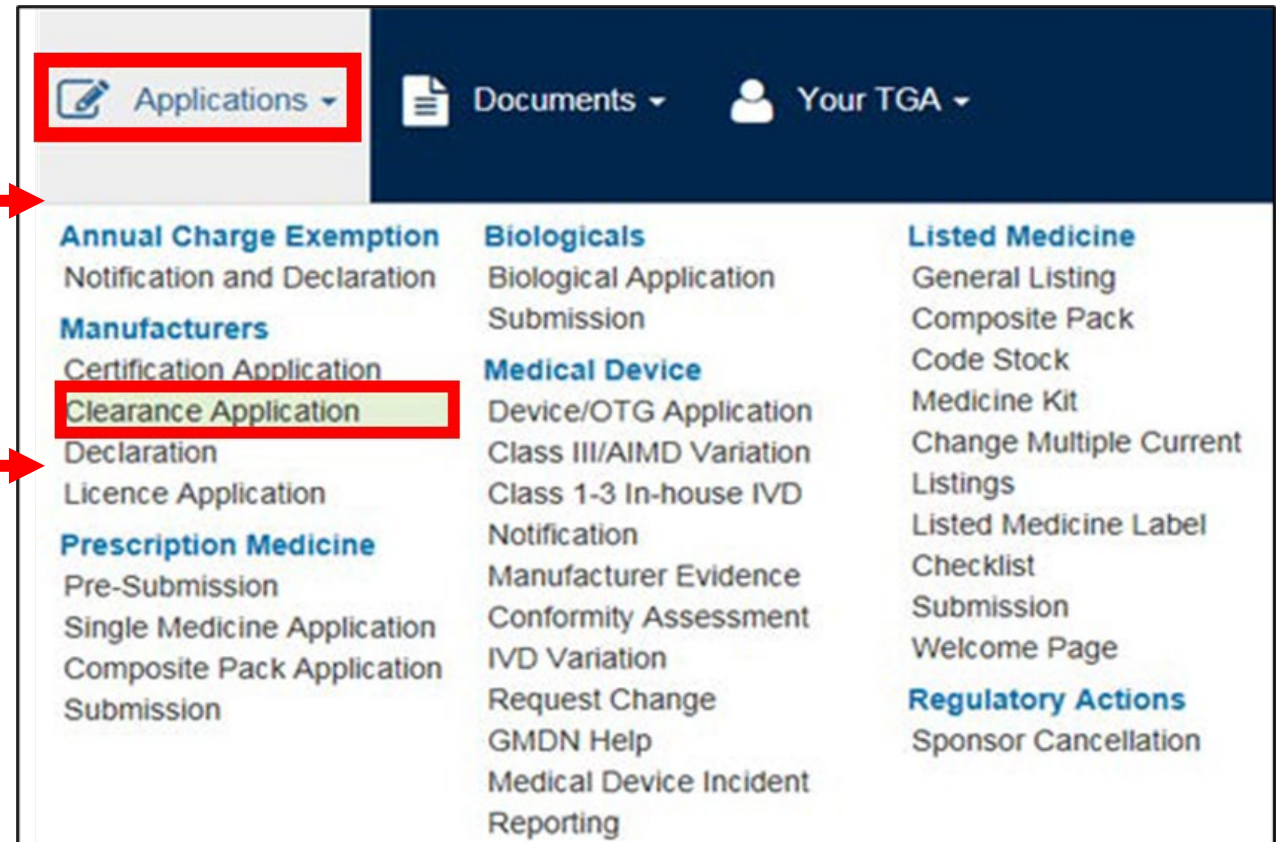
To create a new application:

Login into the TGA Business Services portal

1. Click Applications

then

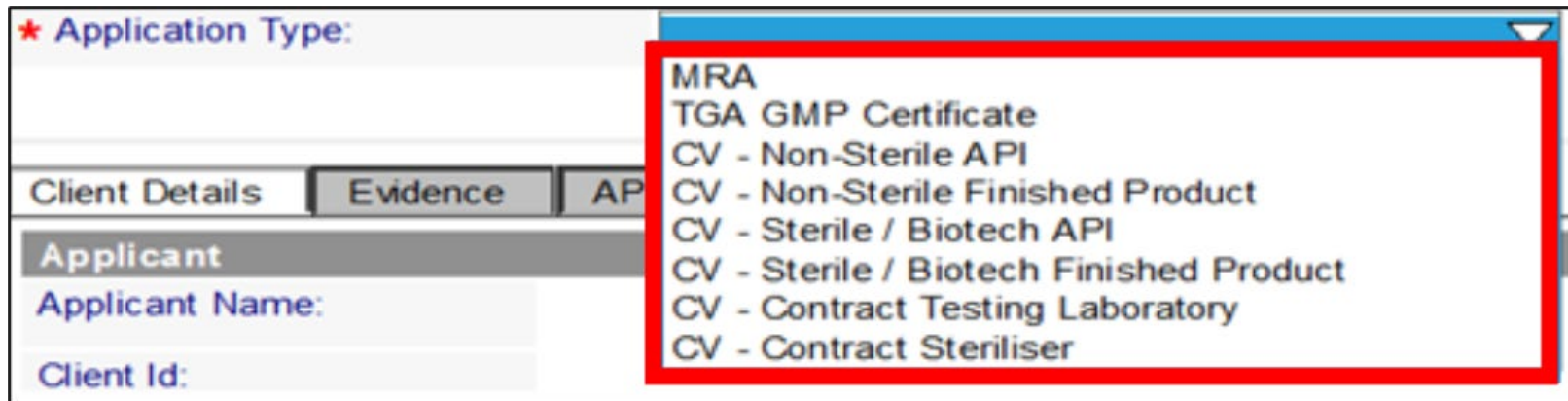
2. Select Clearance Application



# Selecting the Application Type

## New GMP Clearance applications:

- The application type determines what evidence is required
  - The application type cannot be changed after submission
- i** If you select the incorrect application type:
- Your application may be delayed
  - You may need to submit a new application



★ Application Type:

Client Details Evidence AP

Applicant

Applicant Name:

Client Id:

- MRA
- TGA GMP Certificate
- CV - Non-Sterile API
- CV - Non-Sterile Finished Product
- CV - Sterile / Biotech API
- CV - Sterile / Biotech Finished Product
- CV - Contract Testing Laboratory
- CV - Contract Steriliser



# Selecting the Manufacturer Name

## New GMP Clearance applications:

Click Search to select a manufacturer which is already registered with TGA. If the manufacturer is not registered with TGA, or requires a new site address, please complete the request form by clicking New manufacturer. This request will be sent to eBS Helpdesk.

Existing Manufacturer

Manufacturer Name:

Manufacturer ID:

Existing Manufacturing Site:

Manufacturing Site:

Manufacturer Site ID:

Suburb:

Postcode:

MIS Search -- Webpage Dialog

MIS Search Dialog

Please enter a search string

- Keywords including AND and OR may be used to refine your search.  
- Use \* (wildcard) when searching on incomplete words.

Number of entry found : 250

- A H Cox & Co Ltd[10722]
- Actelion Pharmaceuticals Ltd[33480]
- Activ Pharmaceuticals Pty Ltd[14396]
- Advance Pharma GmbH[41289]
- Advent Pharmaceuticals Pty Ltd[45655]
- Aesica Pharmaceuticals GmbH[19244]
- Aesica Pharmaceuticals Limited[10621]
- Akorn Inc[521]
- Alcon Pharmaceuticals GmbH[10497]
- Alkermes Pharma Ireland Limited[166]

- Check the manufacturers in the system before requesting a new manufacturer
- Where the site's name has changed:
  - Select the company's old details
  - Submit evidence and request an update as part of the new application
- Contact us before requesting a new manufacturer entry

**i** Duplicated manufacturing sites can extend processing times and may require significant updates to your ARTG entries.

# Selecting the Application Scope

## New GMP Clearance applications

### API scope

API  Product  Sterile/Biotech  Non-Sterile  Sterile/Biotech & Non-Sterile

API	
API Name	Manufacturing Steps
<input type="checkbox"/> Paracetamol	Active material manufacture

### Product (dosage form)

API  Product

Product Details					
Manufacturer Types	Sterility	Manufacturing Class	Dosage Form	Product Code	Manufacturing Steps
<input type="checkbox"/> Medicine manufacture	Non Sterile	Multiple manufacturing steps/Multiple products	Solid Unit Dosage Forms - Tablets	Registered Therapeutic Good	Finished Product Manufacture
<input type="checkbox"/> Medicine manufacture	Sterile	Multiple manufacturing steps/Multiple products	Injection, solution	Registered Therapeutic Good	Sterile Finished Product Manufacture

- Your application scope determines what evidence is required
  - API / Product
  - Sterility
  - Dosage form
  - Manufacturing steps
- **Separate applications** need to be submitted for API and finished product scopes
- You should ensure your evidence supports your scope

**i** The application cannot be amended to the correct scope later if the wrong one is selected during submission.

# Registration/Listing and ARTG Updates

Client Details | API/Product Details | Evidence | Fees and Payments | Declaration

?

\* Is this GMP Clearance application related to a product listing/registration submission or variation of an Australian Register of Therapeutic Goods (ARTG) entry?  Yes  No

\* Submission Type:   
 Prescription Medicine - Cat 1  
 Prescription Medicine - Cat 2  
 Prescription Medicine - Cat 3  
 OTC medicine  
 Complementary medicine  
 Biological

Product submission number:

\* Is this a Compliance Verification Assessment?

\* In the Evidence to be provided are you using a Letter of Access to Clearance or Evidence?

Supporting Documents

Client Details | API/Product Details | Evidence | Declaration

?

\* Is this GMP Clearance application related to a product listing/registration submission or variation of an Australian Register of Therapeutic Goods (ARTG) entry?  Yes  No

\* Submission Type:   
 Prescription Medicine - Cat 1

Product submission number:   
 PM-20XX-XXXX-X-X

\* Is this a Compliance Verification Assessment?   
  Yes  No

\* In the Evidence to be provided are you using a Letter of Access to Clearance or Evidence?   
  Yes  No

Supporting Documents

- For applications related to registration / listing, include:
  - Milestone date details
  - Product submission number
- Provide a cover letter for additional details or clarification as necessary
- This information assists us to effectively process and prioritise applications

# Payment of Fees

Mandatory Certificates or Letters:

* 1 Current GMP Certificate	Select delivery method
	TGA to obtain GMP Certificate
	Upload Evidence
	Manufacturer to Provide
	LOA to Clearance
	LOA to Evidence
	Submit Paper Copy

## US FDA and Health Canada (HC)

For **CV applications** using US FDA or HC evidence, select TGA to obtain GMP Certificate

- **Do not** upload a document for the 'current GMP Certificate' as this will cause a delay
- Upload the US FDA inspection report or HC Exit Notice under the most recent inspection report

### TGA to obtain GMP Certificate

Please note, by choosing this option a fee for obtaining evidence from an overseas regulatory authority will be charged

\* Select who TGA to liaise with: USA - Food & Drug Administration

\* Enter the Last Inspection Date: dd/mm/yyyy

OK Cancel

### TGA to obtain GMP Certificate

Please note, by choosing this option a fee for obtaining evidence from an overseas regulatory authority will be charged

\* Select who TGA to liaise with: Canada - Health Canada - manufacturer within Canada only

\* Enter the Last Inspection Date: dd/mm/yyyy

OK Cancel



If you do not select 'YES' to this question and it is a CV application, the application will be delayed until the fee is paid.

\* Is this a Compliance Verification Assessment?

Yes  No

# Submitting a Variation Application

- To create a variation application:

- Log into TGA Business Services portal,

1. Click **Your TGA**

2. Select **Manufacturer Information**

3. Filter clearances using 'CL' and select relevant clearance

4. Select **Vary application** from the menu bar at the top of your GMP clearance

Applications Documents Your TGA

Welcome

What would you like to do to

Current ARTG Entries  
Consumer Medicine and Product Information  
Class 1-3 In-house IVD Notifications  
Manufacturer Information

Manufacturer Information

Approval Area: All Approval Areas

Manufacturer: All Manufacturers

Filter on: Identifier for CL Go Reset

Approved	Identifier	Site Address	Received	Expiry Date
2016-08-29	MI-2015-CL-		2016-08-29	2016-12-14
2016-08-26	MI-2016-CL-		2016-05-31	2017-10-02
2016-08-14	MI-2016-CL-		2016-05-10	2016-08-17

TGA eBusiness Services Clearance

Close View Entire App Vary Application Home

# Maintenance of Active GMP Clearances

## Variation Applications

Status:	Active
Tracking Number:	MI-2022-CL-01234-1
Original Tracking Number:	MI-2019-CL-04567-1
Application Type:	CV - Non-Sterile Finished Product

- Submit a variation application if you already hold a clearance
  - This maintains the link to your existing clearance
- Variation applications will receive a temporary, in-process number when submitted:
  - This reverts to the original tracking number (e.g. MI-2019-CL-04567-1) once the application is approved
  - This avoids the need to update ARTG entries
- Variation applications can only be submitted up to 30 days past expiry

# Extensions

Variation Type:  Change Clearance Details  Change Clearance Status  Renewals

Client Details | Status | Conditions | Fees and Payments | Declaration

?  
\* Select new status:  Cancel  Extend  
\* Reason for Extension:  
\* Is this your first extension request?  
Description:

Awaiting TGA inspection  
Awaiting GMP Clearance application assessment by TGA  
Awaiting inspection by regulatory authority  
Awaiting evidence from regulatory authority  
Other

## Variation Applications

- Extensions can be issued for valid reasons
  - Check for new GMP evidence prior to submission
  - Submit a renewal application if new evidence is available
- In 'Description' include the explanation for the request
- Evidence may be required to support extension requests
- A TGA inspection may be required if you cannot provide updated supporting evidence

# Evidence

CV pathway	Non-Sterile API	Non-Sterile Finished Product	Sterile or Biotech API	Sterile or Biotech Finished Product	Contract Testing Lab or Steriliser
<a href="#">GMP Certificate</a>	✓	✓	✓	✓	✓
<a href="#">Most recent inspection report</a>	✓	✓	✓	✓	✓
<a href="#">Regulatory inspections list</a>	✓	✓	✓	✓	✓
<a href="#">Regulatory action details</a>	✓	✓	✓	✓	✓
<a href="#">Site Master File (SMF), quality manual or equivalent</a>	✓	✓	✓	✓	✓
<a href="#">List of products intended for supply</a>	✓	✓	✓	✓	✗
<a href="#">GMP agreement or equivalent</a>	ⓘ	✓	ⓘ	✓	✓
<a href="#">Release procedure(s)</a>	ⓘ	✓	ⓘ	✓	✗
<a href="#">Validation Master Plan (VMP)</a>	ⓘ	ⓘ	✓	✓	ⓘ
<a href="#">Latest Product Quality Review (PQR)</a>	ⓘ	ⓘ	✓	✓	✗
<a href="#">List of authorised tests</a>	✗	✗	✗	✗	✓

✓ = Required    ✗ = Not Required    ⓘ = Not required unless requested

## Application Requirements

- Provide all supporting documentation as per the GMP Clearance Guidance
- You need to provide all relevant evidence when submitting both new and variation applications
- Provide an API declaration where required for both MRA and CV applications
- Your application will be delayed or not issued if all required evidence is not provided



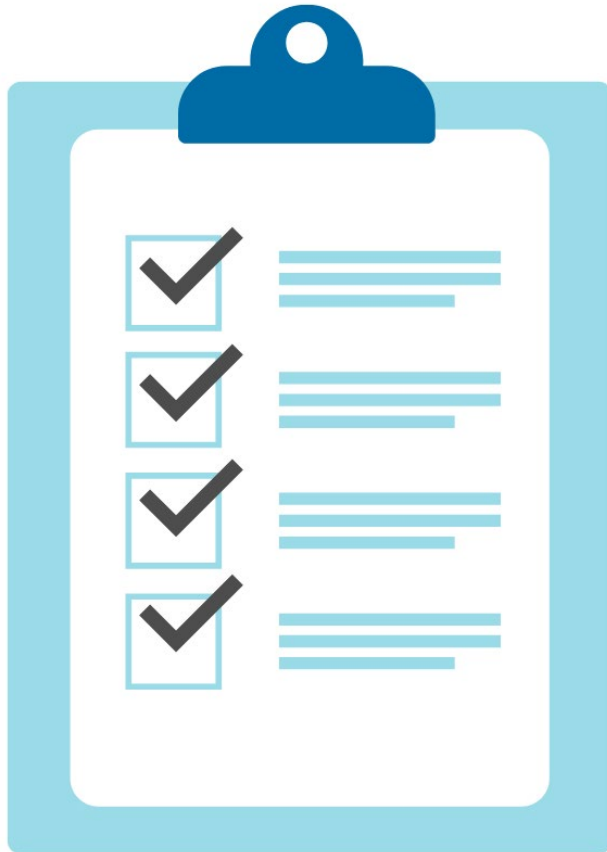


# Evidence

## Cover Letters

Cover letters should be used to provide additional clarification and information:

- Specific details of activities performed at the site
- Changes to the manufacturer details (name or address)
- Absence of evidence (where appropriate)
- Regulatory submissions (submission details, related applications)
- Medicine shortages or prioritisation



# Evidence

## Letter of Access (LoA)

LoAs can be used to access:

- An issued GMP Clearance
- Evidence which has been previously submitted

The type of LoA should be defined in the Letter of Access from the other sponsor or manufacturer:

- LoA to evidence
- LoA to clearance

Ensure the evidence or the clearance scope is identical or greater than the application being submitted



For LoAs to Clearance: The reference clearance must fully cover the scope of your application. Where this is not the case the scope will be amended or the clearance will not be issued.



An LoA cannot reference a clearance which was issued using another LoA.

# Evidence

## TGA Certificates

A TGA inspection may be required when:

- There is no supporting evidence available
- There are compliance issues

For contributing sponsors to a TGA inspection

- You do not need to submit another GMP Clearance application
- The TGA certificate will be issued to the manufacturer
- You will then be issued with a corresponding GMP Clearance

**i** If you decline to contribute to a TGA overseas inspection without reasonable justification, we will not issue a GMP Clearance to you.



# Evidence

## GMP Clearance Questionnaire

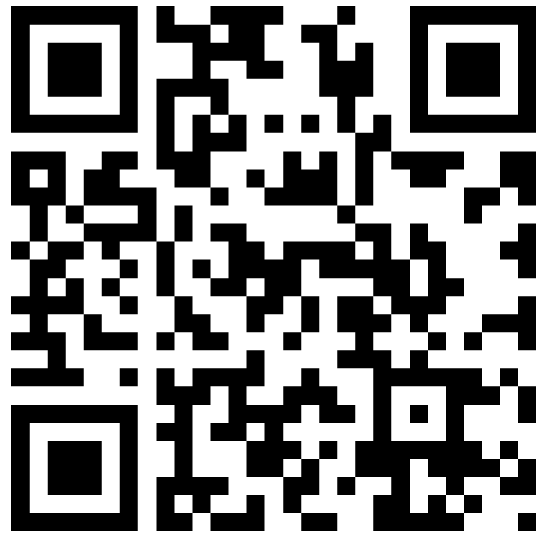
Introduced as a requirement during the COVID-19 pandemic:

- Provides additional information for assessment
- Used where the inspection report is >3 years old



Ensure	The form is filled out completely
Ensure	Both parts of the form are provided
Provide	A separate document with further details if not enough space is available

# Questions?



Scan this QR code with your device to submit a question



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**Australian Government**

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Therapeutic Goods Administration