



# Mutual recognition: basic aspects and mechanism. GMP certificates

Belén Escribano, PhD Head of the Pharmaceutical Inspection and Enforcement Department of AEMPS







# The EU network of medicines agencies







- 31 countries:
  - 28 EU MMSS
  - + 3 Members of the European Economic Area (EEA)
- 44 medicines agencies (human and vet)
- UE + EEA populationthan 500 millions





# Basic elements for the cooperation between NCAs: The EU network of medicines agencies

- Common legislation and GMP Standards
   https://ec.europa.eu/health/human-use/quality\_en
- Common procedures: compilation of community procedures
   http://www.ema.europa.eu/docs/en\_GB/document\_library/Regulator
   y\_and\_procedural\_guideline/2009/10/WC500004706.pdf
- Common database on authorizations and certificates
   <a href="http://eudragmdp.ema.europa.eu/inspections/displayWelcome.do">http://eudragmdp.ema.europa.eu/inspections/displayWelcome.do</a>
- Internal EU audit programme: Joint Audit Program (JAP)
   <a href="http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/joint\_audit\_programme.jsp&mid=WC0b01ac058006e06f">http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/joint\_audit\_programme.jsp&mid=WC0b01ac058006e06f</a>





# Joint Audit Program (JAP)

- Objective: to achieve, maintain and verify equivalence and practical application of GMP standards by national inspectorates agencies across the EEA countries and MRA partners
- National inspectorates are audited by qualified auditors (experienced GMP inspectors) from several countries
- Evaluation guide agreed with PIC/S



- Tool for international collaboration: to preserve confidence in the equivalence of GMP systems to all EEA countries and MRA partners
- Joint audits are expected to lead to an improvement of the assessed authorities and allow the possibility that national auditors can transfer experiences gained during the audits to their national inspectorates
- The Joint Audit Programme also contributes to the training of inspectors





# Agreements between the EU and third countries

- Cooperation agreements allow EU authorities and their counterparts to:
  - rely on each other's GMP inspection system;
  - share information on inspections and quality defects;
  - waive batch testing of products on import into their territories;
- They aim to facilitate market access and encourage greater international harmonisation of compliance standards while protecting consumer safety
- They also facilitate trade in pharmaceuticals because they reduce costs for manufacturers by reducing the number of inspections taking place at facilities and waiving re-testing of their products upon importation
- Basic content is similar but the scope varies between the different current agreements
- The agreements are signed between all EU MMSS and a third country
- Detailed information in:

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/general\_content\_0 01843.jsp&mid=WC0b01ac058005f8ac





## **Current EU agreements**

- Mutual recognition agreements (MRA)
  - Australia (1999)



Canada (2003)



Japan (2004)



New Zealand (1999)



Switzerland (2002)



- Agreement on Conformity Assessment and Acceptance (ACCA)
  - Israel (2013)



- Mutual recognition of inspections (MRI)
  - United States of America (2017, transitional period till 2019)







### Spanish experience in JAP audits

#### As auditor:

 AEMPS GMP inspectors have participated in the JAP assessment of 6 countries systems in the last 2 years (in and outside the EU)

#### As auditee:

- Audit team: inspectors from United Kingdon (MHRA), Eslovenia (JAZMP), Canadá (Health Canada) and 3 observers from United States of America (FDA)
- Preparation: a coordination group for the process was set in AEMPS with a relevant role for our Technical Inspection Committee
- Answers to the checklist and relevant procedures were provided to the auditor team prior to the one week audit visit in November 2016:
  - On-site evaluation at Inspectorate
  - On-site evaluation at Laboratory
  - 2 observed inspections
- JAP report received in January 2017 / AEMPS replies sent in January 2017 / Final positive report in February 2017





### **GMP** certificates

- Essential document proof of GMP compliance
- After each GMP inspection a certificate or a non-complicance statement must be issued
- EU certificates content is defined in the Compilation of Community Procedures and includes:
  - Name of the NCA isssuing it
  - Identification of the inspected site
  - Applicable legislation
  - Date of the inspection visit
  - Statement of compliance with GMP requirements
  - Validity period: 3 years but might be extended or reduced
  - Manufacturing activities to which it applies
- EU certificates may be consulted in **EUDRAGMDP database**: <a href="http://eudragmdp.ema.europa.eu/inspections/displayWelcome.do">http://eudragmdp.ema.europa.eu/inspections/displayWelcome.do</a>





## Спасибо!

