Regulators Perspective on “Quality by Design”:

GMP/GDP Inspectors Working Group

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What is GMP/GDP IWG?

- An EMEA working group mandated to:
  - develop GMP and GMP-related guidance
  - work on harmonised approaches to GMP inspections and related activities
- Representatives of the GMP inspectorates of all EEA national competent authorities
- Reporting lines to
  - CHMP/CVMP
  - European Commission
  - Heads of Medicines Agencies
  - National Competent Authorities

Does the Group support “QbD”?

- Yes
  - The proper implementation of ICH Q8, Q9 and Q10 should improve product and process understanding and knowledge
  - Improve manufacturing performance
  - Improve compliance
  - Provide greater assurance of patient safety and continuity of supply with respect to manufacturing aspects

Impact on GMP Inspectorates

- Inspector training
  - New ICH concepts
  - Design of Experiments, Statistics
  - “New” technologies such as NIR, acoustics
  - Practical examples
- Collaboration with assessors
  - Identify aspects for closer examination on site pre-authorisation
  - Post-authorisation collaboration also foreseen
- Co-operation with industry
  - Joint training activities

Impact on Inspections (1)

- Most EU inspections are systems-based
- This will not change
- Implementation of QbD
  - Inspectors will be interested in how the Design Space is converted from the development studies and regulatory submission to on-site manufacturing documentation
  - Change control will be a point of interest
  - Identifying and dealing with excursions from the Design Space
  - Knowledge transfer from development

Impact on inspections (2)

- Computerised systems
- Quality Management system including
  - Training of staff
  - Outsourced activities
- Calibration of PAT measurement tools
- Impact of probes introduced for development studies performed post marketing
- Supplier qualification may also be particularly important
- The impact on batch release and the role of the QP

Pre-authorisation Inspections

- We foresee more pre-authorisation inspections initially
  - Triggered by assessors who may wish to explore something in more depth
  - To assess the practical implementation
  - To ensure that the Quality System is sufficiently robust and properly implemented to deal properly with the new flexibility afforded to it

Quality of Development Work

- ICH Q10 applies throughout the lifecycle of the product
- The application of Quality System concepts to development activities is crucial to the successful commercial manufacture of the product
- In principle development studies could be inspected although GMP does not apply
- However GMP inspectors do not foresee routine inspections and do not foresee Q10 certification

Quality Risk Management

- The principles of ICH Q9 are being increasingly applied within the GMP/Quality Systems of manufacturers
  - The correct use of these principles and relevant tools is expected and encouraged
  - There is some concern about the potential for misuse of QRM tools

Unresolved issues

- More discussion is needed to clarify the roles of inspector and assessor in the light of these new ICH approaches to quality and to ensure that the aims of the new vision for Quality discussed at ICH in 2003 are achieved

Thank You

More information at:
http://www.emea.europa.eu/Inspections/PAThome.html