EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Standard operating procedure

Title: Co-ordination of Site Visits in the context of the Certification of Quality and Non-Clinical Data submitted by SMEs developing ATMPs		
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1. Purpose

This SOP describes the procedure and EMA internal responsibilities necessary for coordination of site visits arising from applications for certification of quality and non-clinical data as defined in Article 18 of Regulation 1394/2007/EC and Article 3 of Regulation 668/2009.

2. Scope

This procedure applies to V-PD-BUS, H-QM-BIO, P-CI-MQC and P-CI-CNC.

3. Responsibilities

It is the responsibility of each Head of Sector/Section involved in this procedure to ensure that the procedure is adhered to within his/her sector/section. The responsibility for the execution of a particular part of this procedure is identified in the right-hand column of section 9.

4. Changes since last revision

New SOP.

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5. Documents needed for this SOP

- Template 1 - Applicant's Agreement to Site Visit.
- Template 2 - CAT Site Visit Request.
- Template 3 - Letter of Announcement to Inspectorate.
- Template 4 - Letter of Announcement to Applicant.
- Template 5 - Site Visit Contract.
- Template 6 - Site Visit Register.

These documents are located under X:\Templates\Others\Compliance and Inspection\GMP\SOP 2001 – site visits for ATMPs.

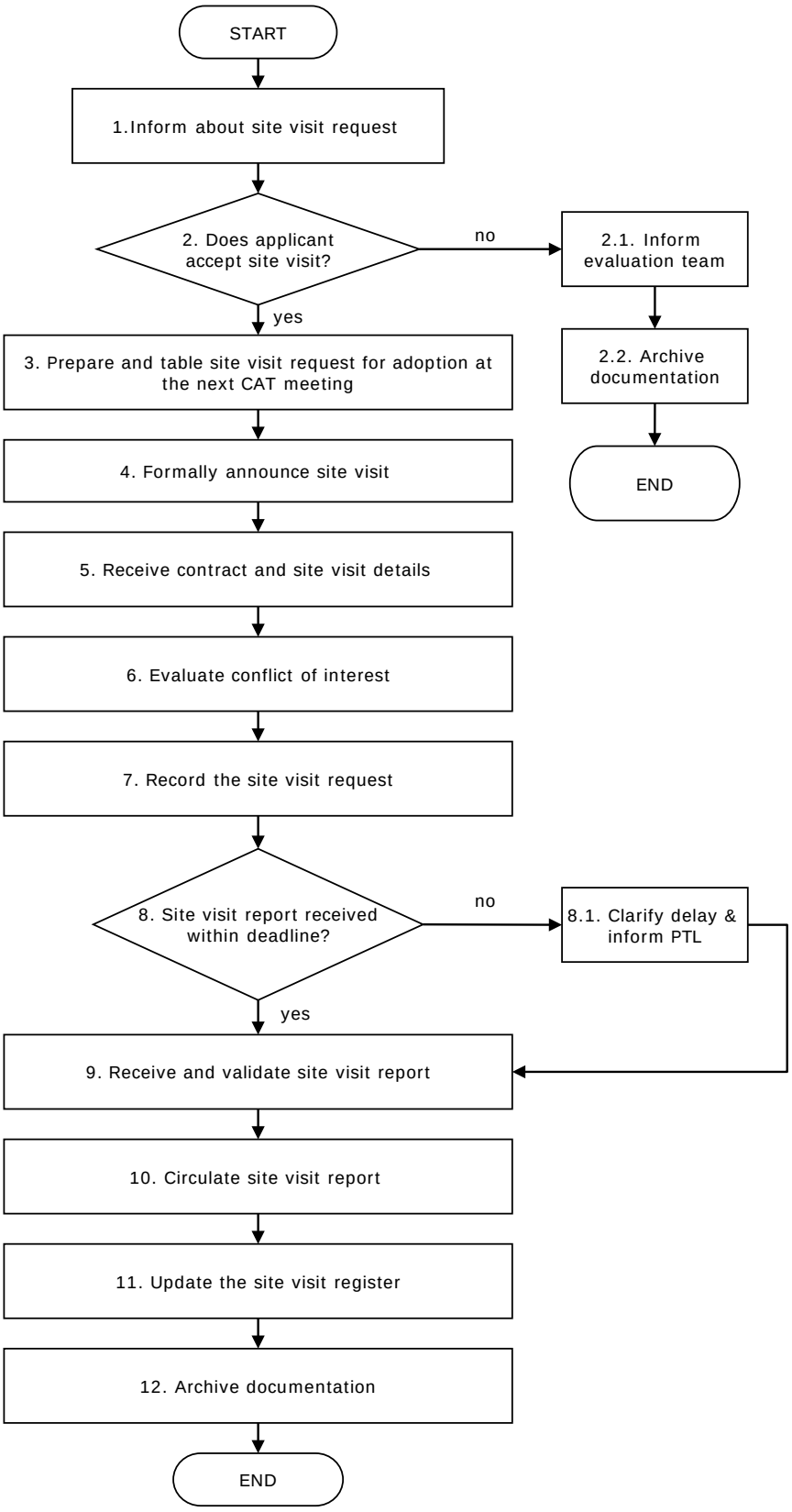
6. Related documents

- SOP/EMEA/0040 Evaluation of conflicts of interests of experts for involvement in EMA activities.
- SOP/H/3334 Evaluation and certification of quality and non-clinical data relating to advanced therapy medicinal products.
- SOP/INSP/2048 Coordination of GMP inspections.
- SOP/INSP/2049 Coordination of GLP inspections.
- Compilation of Community Procedures – GMP Inspection Report Community Format (EMA/INS/GMP/459921/2010).
- Procedural advice on the certification of quality and non-clinical data for small and medium-sized enterprises developing advanced therapy medicinal products (EMA/CAT/418458/2008/corr).
- Scientific Guideline on the Minimum Quality and Non-Clinical Data for Certification of Advanced Therapy Medicinal Products (EMA/CAT/486831/2008/corr).

7. Definitions

CAT	Committee for Advanced Therapies.
H-QM-BIO	Biologicals Section, Quality of Medicines Sector, Human Medicines Development and Evaluation Unit.
P-CI-CNC	Manufacturing and Quality Compliance Section, Compliance and Inspection Sector, Patient Health Protection Unit.
P-CI-MQC	Clinical and Non-Clinical Compliance Section, Compliance and Inspection Sector, Patient Health Protection Unit.
PTL	Product team leader (scientific administrator from H-QM-BIO responsible for the procedure; also referred to as EMA Coordinator in EMA/CAT/418458/2008).
PTM	Product Team Members dealing with site visits related to quality (P-CI-MQC) or non-clinical (P-CI-CNC) data.
V-PD-BUS	Product and Application Business Support Section, Product Data Management Sector, Veterinary and Product Data Management Unit.

8. Process map(s)/ flow chart(s)



9. Procedure

Step	Action	Responsibility
1.	Inform the applicant about the site visit request using Template 1. *Note: PTM informs the applicant of the scope of the proposed site visit and requests a written confirmation of their acceptance or rejection of the site visit within 5 days. The information on the site visit request is received from the PTL in accordance with SOP/H/3334 Step 33.*	PTM
2.	Receive and check applicant's response. If site visit is rejected, go to step 2.1. If the site visit is accepted, go to step 3. *Note: The applicant should respond in writing to PTM within 5 working days. No response is interpreted as rejection of the site visit request.*	PTM
2.1	Inform the CAT-Coordinator and the PTL about the rejection. *Note: If the applicant rejects the proposed site visit, the site vist coordination procedure ends.*	PTM
2.2	Archive all documentation electronically in DREAM.	Assistants to PTM
3.	Prepare a draft site visit request using Template 2 and table it for adoption at the next CAT meeting. *Note: If the applicant accepts the proposed site vist, a draft site visit request is prepared for adoption at the next CAT meeting. The Day 60 Evaluation Report and the written confirmation of the site visit acceptance by the applicant are attached to the draft request. The choice of the authorities responsible for the site visit should be made in line with the criteria defined in the latest version of the CAT guideline: "Procedural Advice on the Certification of Quality and Non-Clinical Data for Small and Medium-Sized Enterprises Developing Advanced Therapy Medicinal Products". The Site Visit Requests should be prepared in analogy to the procedures relevant to GMP/GLP inspection requests as described in SOP/INSP/2048 and SOP/INSP/2049.*	Assistants to PTM
4.	Prepare and send correspondence using Templates 3, 4 and 5. *Note: PTM formally annouces the site visit to the applicant and the inspectors. The correspondence should be prepared in analogy to the procedures relevant to GMP/GLP inspection requests as described in SOP/INSP/2048 and SOP/INSP/2049 and sent via Eudralink within 5 working days of the request adoption by CAT.*	Assistants to PTM
5.	Receive the signed contract and details of the site visit. *Note: The inspectors organising the site visit provide the signed contract, the dates and the names of the site visit participants within 20 days of the CAT request adoption.*	PTM
6.	Evaluate conflict of interest. *Note: Upon receipt of information on the inspection team the validity of the declarations of interest is checked by the assistants who inform the responsible PTM accordingly. Dealing with declarations of interest should be done in analogy to the procedures relevant to GMP/GLP inspection requests as described*	Assistants to PTM

Step	Action	Responsibility
	in SOP/INSP/2048 and SOP/INSP/2049 and SOP/EMEA/0040.	
7.	Record the site visit request. *Note: The site visit request is recorded in the site visit register (located in DREAM under: Cabinets/04. Inspections/4. GMP/Planning and reporting/GMP inspections coordination).*	PTM
8.	Check whether study visit report has been received by the agreed deadline? If no report has been provided go to step 8.1. If the report has been provided go to step 9. *Note: The designated inspectors carry out the site visit and prepare a draft site visit report which is provided to the inspected site for comments. The site visits should be organised and conducted in analogy to procedures used for GMP/GLP inspections in the context of the centralised procedure. The site visit report should follow the available established templates for a GMP or GLP inspection report with appropriate adaptations. The total duration of the site visit procedure including the preparation of the corresponding final report should not exceed 8 weeks.* *The visited site should have the possibility to respond to issues raised by the inspectors within 5 working days of the receipt of the draft report.* *Having evaluated the inspectee's response the inspectors finalise the report including comments on all the issues for clarification during the site visit which were raised in the Day 60 Evaluation Report and send it to the PTM within the deadline specified in the contract.*	PTM
8.1.	Clarify delay with the inspectors and inform the PTL accordingly.	PTM
9.	Receive and validate the site visit report. *Note: PTM check if the report accounts for the issues for clarification raised in the Day 60 Evaluation Report and if necessary contacts the Lead Inspector for appropriate amendments.*	PTM
10.	Circulate the site visit report. *Note: The validated final report is sent via Eudralink to the CAT-Coordinator and the PTL.*	Assistants to PTM
11.	Update the site visit register. *Note: The Site Visit Register is updated with relevant details and a number is assigned to the Site Visit Report (= site visit number in the Site Visit Register; see Template 6).*	PTM
12.	Archive documentation. *Note: The Site Visit Report and all related documents (correspondence) are archived in line with the latest EMA archiving policy (in the electronic Product Master File).*	Assistants to PTM

10. Records

All paper documents are stored in a dedicated product binder. Electronic copies of the paper documents and all other electronic records are stored in the Product Master File in DREAM under the following path:

01. Evaluation of Medicine/H-AT/Certification/"product name"

The following documents are considered as records (retention time: 30 years):

- Applicant's Agreement to Site Visit.
- CAT Site Visit Request.
- Letter of Announcement to Inspectorate.
- Letter of Announcement to Applicant.
- Signed Site Visit Contract.
- Evaluation of conflict of interest and all related documents.
- Site Visit Report.