EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Work instructions

Title: Inspection of quality control facilities located in 3rd countries		
Applies to: P-CI-MQC		
Status: **PUBLIC**		Document no.: WIN/INS/2047
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Signature: On file	Signature: On file	Supersedes: WIN/INSP/2047 (09-JAN-12)
Date: 12-APR-17	Date: 12-APR-17	TrackWise record no.: 4280

1. Changes since last revision

Three scenarios have been established to coordinate inspections of quality control (QC) facilities located in 3rd countries:

- Site never inspected by EU/EEA authority
- Site inspected before by EU/EEA authority
- Site with a statement of non-compliance

Inspection will not be triggered automatically if the QC site has never been inspected before by EU/EEA authority, a risk based approach will determine the need of a pre-approval inspection.

It is made explicit that a non-compliant site will not be accepted during validation.

2. Records

Electronic copies of inspection requests or emails relating to the decision for inspection are saved under the appropriate inspection folder in DREAM: Cabinets/04. Inspections/4. GMP/Manufacturers/Name of the manufacturer-DUNS number (if available).

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3. Instructions

These instructions provide the basic principles on the need for requesting an inspection of a QC facility[1] located in a 3rd country[2] and are applicable to new applications, variations and post-authorisation/routine inspections. The supervisory authority(ies) and in certain cases the rapporteurs should also be consulted before requesting an inspection.

3.1. New applications, line extensions and variations

1. If a new application, line extension or variation application include a QC facility that has never been inspected by an EU/EEA authority, or there were significant residual issues from a previous inspection, then the supervisory authority should be consulted and a pre-approval inspection may be requested utilising the risk based criteria described in Section 3.2 and if an inspection is considered necessary, then the outcome of the inspection should be an integral part of the marketing authorisation procedure. If no inspection is considered necessary, then the site should be included in the next routine re-inspection programme.
2. If a new application, line extension or variation application include a QC facility that was inspected in the past by an EU/EEA authority for QC activities and was found to be in compliance with Good Manufacturing Practice (GMP) but there is no valid GMP certificate then the site should be included in the next routine re-inspection programme. For a QC site included in the next routine re-inspection programme normal deferral criteria may be utilised (as per WIN/INS/2054) provided that the interval between inspections does not exceed 5 years.
3. If a new application, line extension or variation application include a QC facility that has been inspected in the past for quality control activities and was found not to be in compliance with GMP, then the site should not be accepted during validation.

3.2. Risk Based Criteria to be utilised

The principles of a risk based approach including but not limited to the following parameters should be taken into consideration before deciding on the need for a pre-approval inspection:

1. GMP compliance history (including information coming from international partners)
2. Product(s) tested at the QC facility
3. Type of testing
4. Sampling and testing issues
5. Quality defect issues

Proximity to a manufacturing site which is scheduled for inspection will be also taken into account.

A distant paper assessment could be considered by the supervisory authority as an interim measure between an on-site inspection and an absence of inspection.

Please refer to SOP/INSP/2048 Coordination of GxP Inspections for further information on organisation of inspections and to WIN/INS/2054 on Deferral of GMP Inspections.

[1] For the purpose of this WIN the following activities are considered to fall in the scope of a Quality Control facility: testing of a biological API, testing of bulk or finished product, on-going stability studies
[2] This WIN applies to Quality Control facilities in 3rd countries where there is no valid Mutual Recognition Agreement for GMP inspection