

# GMP for Imported Products - Foreign GMP Regulatory Inspection

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MINISTRY OF HEALTH MALAYSIA



WHO Collaborating  
Centre  
for Regulatory  
Control of  
Pharmaceuticals



Member of  
Pharmaceutical  
Inspection Co-  
operation  
Scheme



Certified to ISO  
9001:2008  
Cert. No.: AR  
2293



NO: SAMM 450



Member of  
OECD

## PRESENTATION OUTLINE

- ☐ Introduction
- ☐ GMP Evidence
- ☐ Directives On Acceptable GMP Evidence
- ☐ Foreign GMP Inspection
- ☐ Guideline
- ☐ Statistic of Foreign Inspections

## INTRODUCTION

The Control of Drugs and Cosmetics Regulations 1984 (CDCR) requires that;

the **standard of manufacture and quality control of medicinal products** manufactured outside Malaysia be taken into consideration before the products are registered with the Drug Control Authority (DCA).

## INTRODUCTION

NPRA as the secretariat to the DCA is responsible for ensuring;

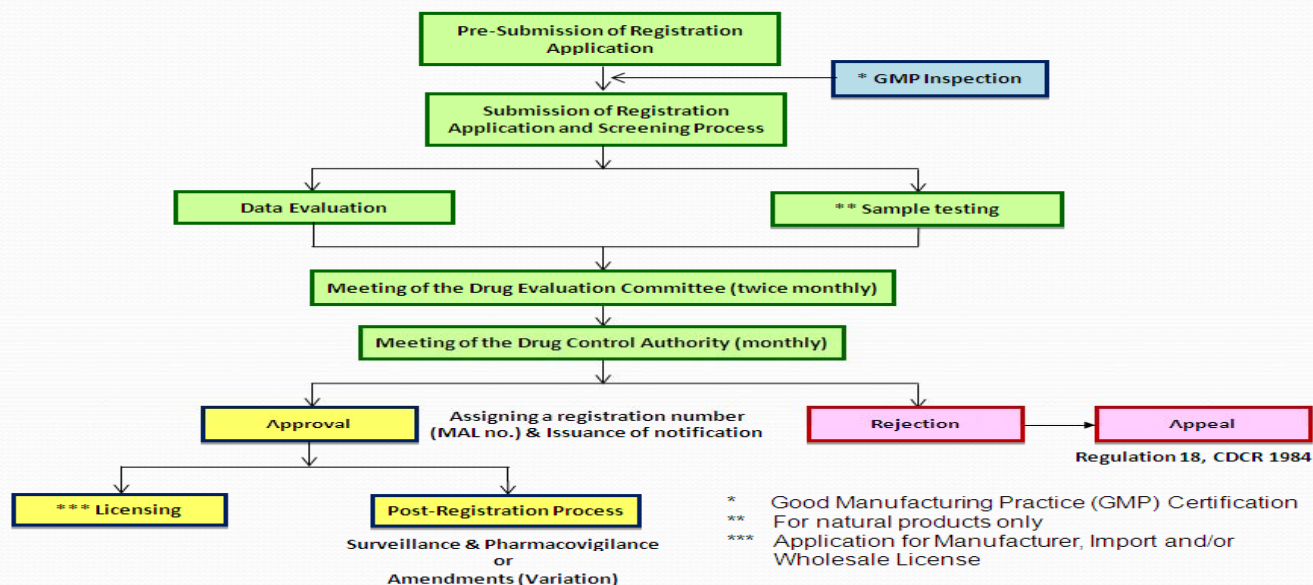
- All manufacturers of registered products in Malaysia are able to provide acceptable evidence that the manufacturing premises conform to current GMP requirements. \
- Hence, foreign manufacturers are also subjected to GMP conformity assessments through **acceptable GMP evidence or GMP inspection by NPRA.**

## INTRODUCTION

Malaysia (NPRA) became the **26th member of the PIC/S** since 1st January 2002.

Therefore, **the current PIC/S Guide to GMP for Medicinal Products and its Annexes** have been adopted as the standard used by NPRA to assess the GMP conformity of medicinal product manufacturers.

# Product Registration Process



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## PHARMACEUTICAL PRODUCTS

Pharma product registered in Malaysia; (march 2016)

Total Products Registered	: 24,700
Local Manufactured	: 40 %
Imported	: 60 %

\*Source: NPRA

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## GMP EVIDENCE

1. One of the requirements to register/renew the registration of an imported medicinal product in Malaysia is submission of acceptable evidence of the GMP Compliance of the manufacturer.
2. This GMP evidence is also required as supporting documents for application of change of site (COS) for the purpose of verifying the GMP status of the foreign manufacturer.

## ACCEPTABLE GMP EVIDENCE

For pharmaceutical manufacturer **located out site Malaysia**, GMP complians status is verified through.

**GMP  
Certificate**

**GMP  
Inspection  
Report**

## GMP CERTIFICATES

A GMP certificate is granted when the manufacturing facility has been audited and found to demonstrate satisfactory compliance with the required GMP standard.

A GMP certificate would normally be valid for 3 years from the date of inspection/assessment

Example:

Date of inspection: 01/01/2013

Date of GMP certificate evaluation: 02/01/2016

\*\* GMP certificate will consider not acceptable.

## GMP INSPECTION REPORT

- Brief summary of the manufacturing activities.
- Brief description of the quality management system of the firm
- Brief summary of the findings, and recommendations (where applicable).
- Conclusion regarding the GMP status.

GMP report serves as supporting document for the regulator to clarify information which is not mentioned in GMP certificates.

## GMP EVIDENCE

### What NPRA will look into when evaluating GMP certificate/reports

- Issuing authority
- Name and address of the manufacturing site
- Date of inspection
- Types of dosage forms/range of products being manufactured
- GMP standard used for the inspection
- Clarifying remark/restriction: Penicillin & Non penicillin block, steroids & non-steroids block

## ACCEPTABLE GMP EVIDENCE

### Acceptance of GMP evidence.

Issued by the  
NDRA that  
regulates the  
products

Based on their  
latest GMP  
routine  
inspection  
(< 3yrs)

GMP Inspection  
conducted against the  
PIC/S GMP Guides

## FOREIGN MANUFACTURERS

Manufacturers located out site Malaysia

**Zone 1:**  
Located in  
PIC/S  
countries

**Zone 2:**  
Located in  
Non PIC/S  
countries

**Zone 3:**  
located in  
ASEAN  
countries

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## DIRECTIVES ON FOREIGN GMP INSPECTIONS

Directive:  
No. 1 /2012

- Directive: Requirement of GMP for Registration of Imported Pharmaceutical Products.

Directive:  
No. 1/2016

- Directive: Requirement for Foreign GMP Inspection for the New /Renew Registration of Pharmaceutical Products.

Directive:  
No. 11 /2016

- Directive: Acceptance of GMP Complians for the Renewal Registration of Pharmaceutical Products.

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## DIRECTIVES ON FOREIGN GMP INSPECTIONS

Directive:  
No. 1 /2012

Directive:  
Requirement of GMP  
for Registration of  
Imported  
Pharmaceutical  
Products.

- For New Registration & Renewal Registration:
- For facilities located in PIC/S or ICH countries:
  - GMP Certificate/Inspection report
- For facilities located in Non PIC/S or Non ICH countries but have been inspected by NDRA of PIC/S or ICH:
  - GMP Certificate/Inspection report
- No GMP Inspection by NPRA

## DIRECTIVES ON FOREIGN GMP INSPECTIONS

Directive:  
No. 1 /2016

Directive: Requirement  
for Foreign GMP for the  
New/Renew  
Registration of  
Imported  
Pharmaceutical  
Products.

- For facilities located in Non PIC/S or Non ICH countries:
  - For new registration:
    - Inspection by NPRA is REQUIRED  
effective: July 2016
  - For renewal registration:
    - Inspection by NPRA is REQUIRED  
effective: January 2017.

## DIRECTIVES ON FOREIGN GMP INSPECTIONS

Directive:  
No. 11 /2016  
Directive: Acceptance  
of GMP Compliers  
for the Renewal  
Registration of  
Pharmaceutical  
Products

- For renewal registration:
- For facilities located in non PI/CS or Non ICH countries but have been inspected by NDRA of Reference Countries\* :
- Inspection by NPRA is NOT REQUIRED effective: January 2017.

## FOREIGN GMP INSPECTION

For the registration of pharmaceutical products from the manufacturers **located out site Malaysia**, GMP inspection by the NPRA is **NOT REQUIRED** for:

Manufacturers  
located in PIC/S  
countries

Manufacturers  
located in Non  
PIC/S countries  
but certified by  
NDRA from  
Reference  
Countries\*  
(for renewal only)

Manufacturers  
located in ASEAN  
countries and  
certified by NDRA  
Listed Inspection  
Service under the  
ASEAN Sectoral  
MRA on GMP

# FOREIGN GMP INSPECTION -OBJECTIVE

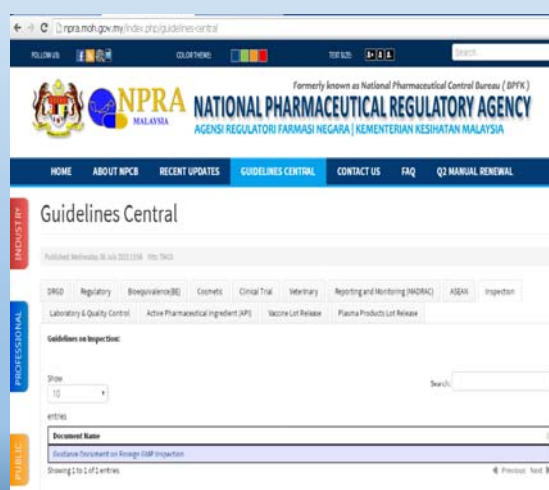
1. Assess the **conformance** of foreign manufacturers to **GMP requirements**.
2. Ensure **quality and safety of products** that are registered or in the process of registration/re-registration/change of manufacturing site with DCA of Malaysia and products manufactured for clinical trial purposes (investigational medicinal products).
3. This activity is to strengthen the **supervision and administration** over imported products and foreign manufacturers.

# GUIDELINE

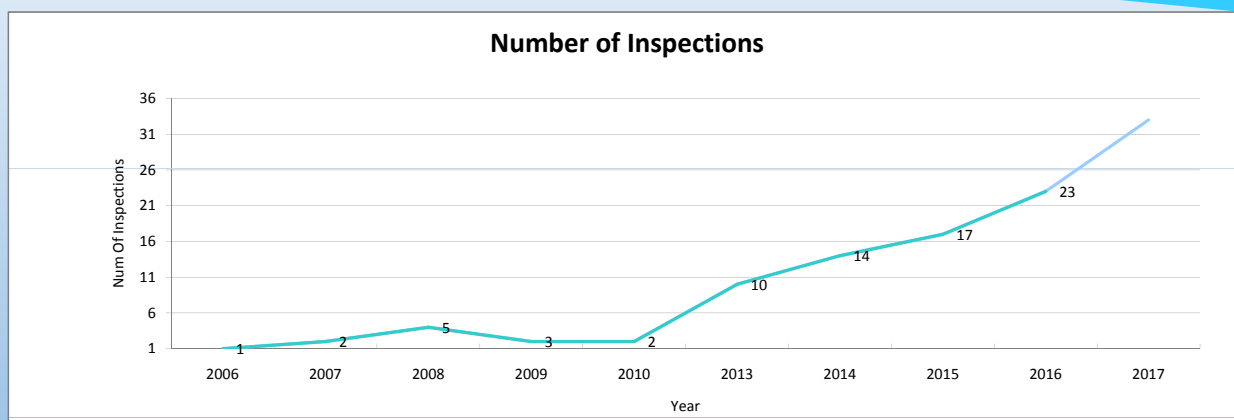
## GUIDANCE DOCUMENT FOREIGN GMP INSPECTION

2<sup>nd</sup> Edition

July 2016



## STATISTIC OF INSPECTIONS



70 inspections have been conducted by NPRA until the date of 25/10/16 while 7 inspections are scheduled to be conducted before 31/12/16.

\*Source: NPRA

## STATISTIC OF INSPECTIONS

### FOREIGN GMP INSPECTION

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	TOTAL
Pharma	0	1	1	2	2	0	0	6	13	15	17	67
Biological	0	0	0	1	0	0	0	4	0	2	5	12
Traditional / Health Supp.	1	1	4	0	0	0	0	0	1	0	1	8
<b>TOTAL</b>	<b>1</b>	<b>2</b>	<b>5</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>14</b>	<b>17</b>	<b>23</b>	<b>77</b>

\*Source: NPRA

# STATISTIC OF INSPECTIONS

## FOREIGN GMP INSPECTION

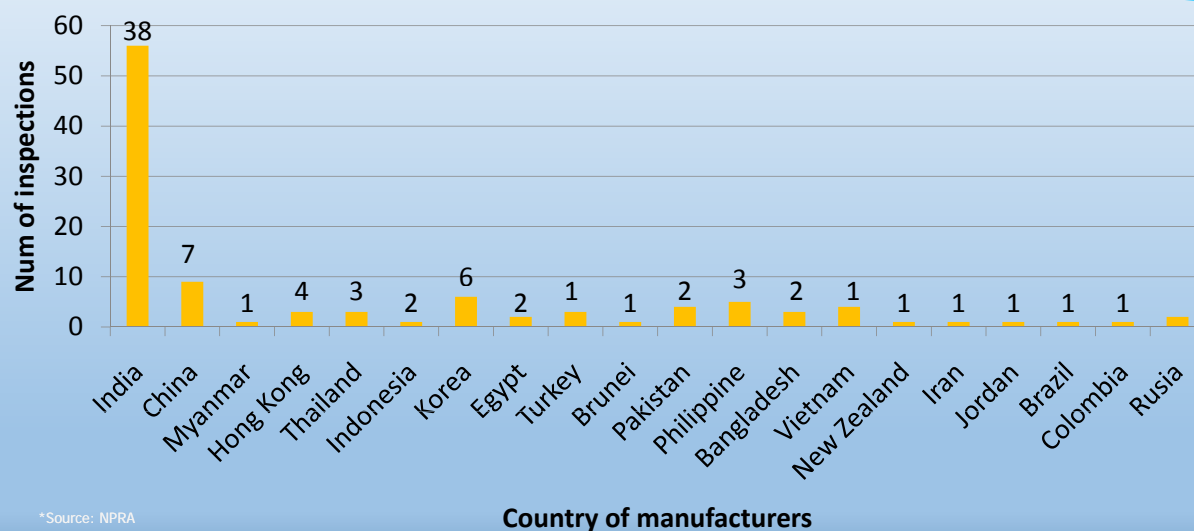
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	TOTAL
<b>Sterile</b>	0	1	1	3	2	0	0	10	4	7	11	<b>39</b>
<b>Non Sterile</b>	1	1	4	0	0	0	0	0	10	10	12	<b>38</b>
<b>TOTAL</b>	<b>1</b>	<b>2</b>	<b>5</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>14</b>	<b>17</b>	<b>23</b>	<b>77</b>

\*Source: NPRA

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# STATISTIC OF INSPECTIONS

## Location of Manufacturers

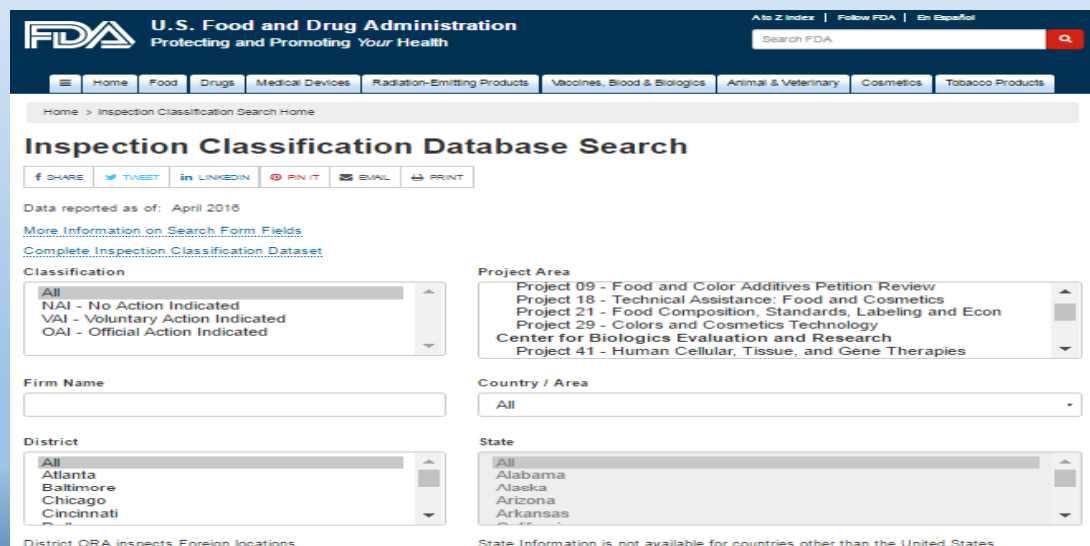


\*Source: NPRA

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# Some useful link to check on GMP validity

US FDA - <http://www.accessdata.fda.gov/scripts/inspsearch/>



The screenshot shows the US FDA Inspection Classification Database Search page. The header includes the FDA logo and navigation links. The main content area has a search bar and a list of filters. The filters include:

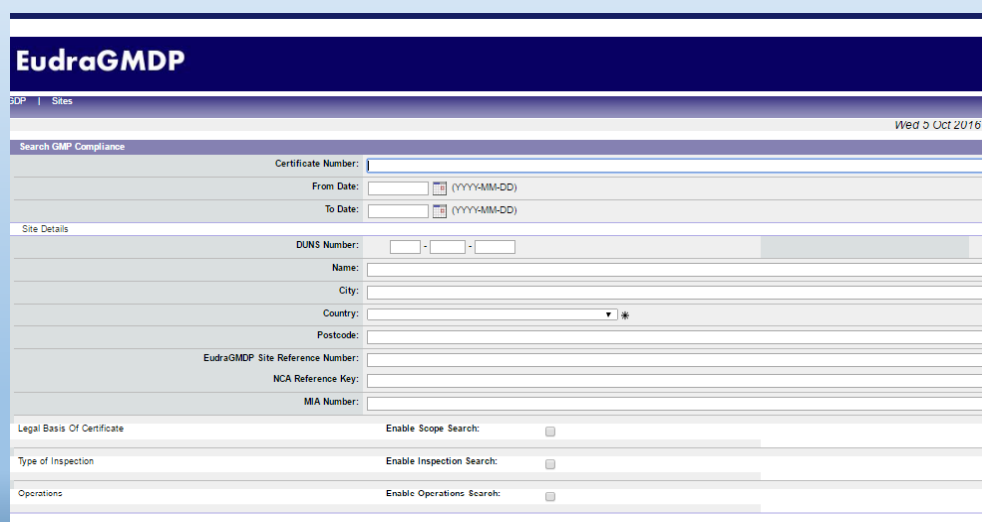
- Classification:** All, NAI - No Action Indicated, VAI - Voluntary Action Indicated, OAI - Official Action Indicated
- Project Area:** Project 09 - Food and Color Additives Petition Review, Project 18 - Technical Assistance: Food and Cosmetics, Project 21 - Food Composition, Standards, Labeling and Econ, Project 29 - Colors and Cosmetics Technology, Center for Biologics Evaluation and Research, Project 41 - Human Cellular, Tissue, and Gene Therapies
- Firm Name:** [Text input field]
- Country / Area:** All
- District:** All, Atlanta, Baltimore, Chicago, Cincinnati
- State:** All, Alabama, Alaska, Arizona, Arkansas

At the bottom, there are links for "More Information on Search Form Fields" and "Complete Inspection Classification Dataset".

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# Some useful link to check on GMP validity

<http://eudragmdp.ema.europa.eu/inspections/gmpc/searchGMPCompliance.do>



The screenshot shows the EudraGMDP Search GMP Compliance page. The header includes the EudraGMDP logo and navigation links. The main content area has a search bar and a list of filters. The filters include:

- Certificate Number:** [Text input field]
- From Date:** [Date input field]
- To Date:** [Date input field]
- Site Details:**
  - DUNS Number:** [Text input field]
  - Name:** [Text input field]
  - City:** [Text input field]
  - Country:** [Dropdown menu]
  - Postcode:** [Text input field]
  - EudraGMDP Site Reference Number:** [Text input field]
  - NCA Reference Key:** [Text input field]
  - MIA Number:** [Text input field]
- Legal Basis Of Certificate:** [Text input field]
- Type of Inspection:** [Text input field]
- Operations:** [Text input field]

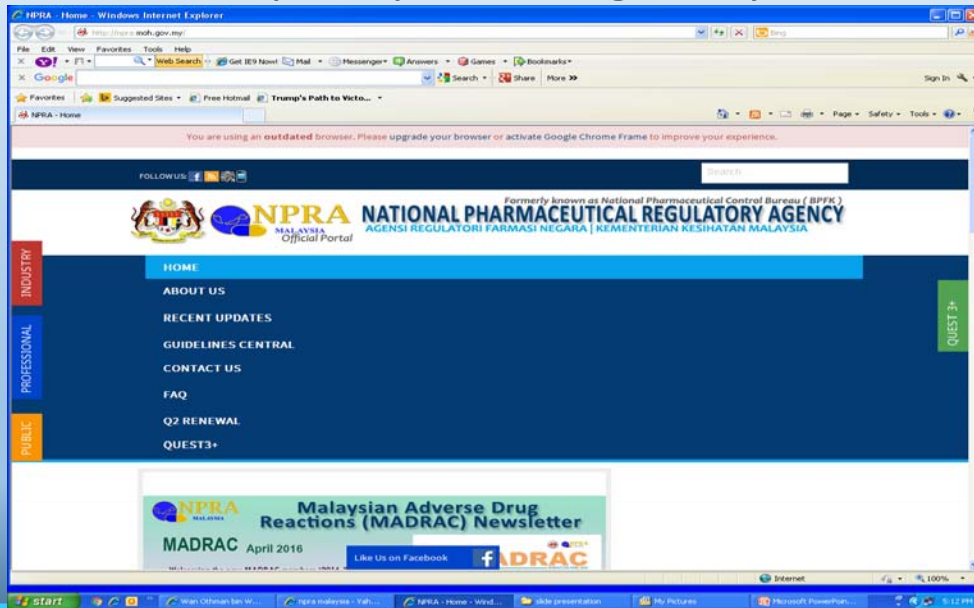
At the bottom, there are checkboxes for "Enable Scope Search", "Enable Inspection Search", and "Enable Operations Search".

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More info....

<http://npra.moh.gov.my>



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