

PHARMACEUTICAL INSPECTION CONVENTION PHARMACEUTICAL INSPECTION CO-OPERATION SCHEME

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ANNUAL REPORT 2014

Prepared by the Secretariat



Leading the international development, implementation and maintenance of harmonised GMP standards and quality systems of inspectorates in the field of medicinal products

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In memoriam



Hans Smallenbroek (Netherlands / IGZ), former PIC/S Chair and former Member of the PIC/S Committee, passed away on 19 March 2014.

A Founding Father of the PIC Scheme, launched back in 1995, he designed the PIC/S logo at the occasion of the PIC/S Seminar in Zeist (Netherlands) in 1998.

PIC/S is profoundly saddened by his premature disappearance. To honour his memory, the present report is dedicated to Hans.

To Hans, who was unique to us





The Pharmaceutical Inspection Co-operation Scheme (PIC/S) was established in 1995 as an extension to the Pharmaceutical Inspection Convention (PIC) of 1970 (see Annex 1). PIC/S is an informal co-operative arrangement between Regulatory Authorities in the field of Good Manufacturing Practice (GMP) of medicinal products for human or veterinary use. It is open to any Authority having a comparable GMP inspection system. On 31 December 2014, PIC/S comprised 46 Participating Authorities from all continents. For the list of PIC/S Participating Authorities, see Annex 2.

PIC/S aims at harmonising inspection procedures worldwide by developing common standards in the field of GMP and by providing training opportunities to inspectors. It also aims at facilitating co-operation and networking between competent authorities, regional and international organisations, thus increasing mutual confidence.

A Committee of the Participating Authorities' representatives (PIC/S Committee) supervises the operation of the Scheme. All decisions are taken unanimously. The Committee is assisted in its task by (i) various Sub-Committees; (ii) an Executive Bureau, which steers the Organisation in-between meetings; and (iii) a Secretariat, which assists PIC/S bodies in their duties.

This is the Annual Report of PIC/S' activities in 2014.

ANNUAL REPORT 2014

THE YEAR IN A NUTSHELL

Change of guard

1. At its meeting in Ottawa in October 2013, the PIC/S Committee elected Dr Joey Gouws (South Africa / Medicines Control Council) as Chairperson for the period 2014-2015. On 1^{st} January 2014, Dr Gouws started her chairmanship. This is the first time in PIC/S' history that the Organisation is chaired by a representative coming from the African continent.



Dr Joey Gouws PIC/S Chairperson

The PIC/S Chairperson is assisted in her task by:

- A Deputy Chairman in the person of Mr Paul Hargreaves (United Kingdom / MHRA);
- The immediate former Chairperson, Ms Helena Paula Baião (Portugal / INFARMED IP);
- Members of the Executive Bureau (see para. 5 below); and
- The Secretariat.

2. In 2014 the PIC/S Committee and the PIC/S Executive Bureau (EB) met twice: first in Rome (Italy) on 15-16 May 2014, and then in Paris (France), 20-21 October 2014. The EB always meets in the morning before the Committee's meeting, i.e. on 15 May and 20 October 2014. The EB meetings were mainly dedicated (i) to discussing financial, administrative and staff related issues; (ii) to assisting the Chairperson in the execution of his/her mandate; and (iii) to preparing the meetings of the Committee.

3. The activities of the PIC/S Committee and the outcome of the two above mentioned meetings are summarised in this Annual Report.

New PIC/S Sub-Committee Structure

4. In order to manage PIC/S's growing membership and allow for more participative and efficient organisation, a new Sub-Committee structure was established on 1 January 2014. The new organisational structure is based on seven Sub-Committees (SC): Training (SCT); Expert Circles (SCEC); Strategic Development (SCSD); Compliance (SCC); GM(D)P Harmonisation (SCH); Budget, Risk and Audit (SCB) and Communication (SC COM).

- 5. The SC Chairs, who are also Members of the PIC/S Executive Bureau, are:
 - Mr Paul Hargreaves (United Kingdom / MHRA), Chair of the Sub-Committee on Budget, Risk and Audit (SCB);
 - Mr Boon Meow Hoe (Singapore / HSA), Chair of the Sub-Committee on Training (SCT);

- Ms Anne Hayes (Ireland / HPRA), Chair of the Sub-Committee on Compliance (SCC);
- Mr Paul Gustafson (Canada / HPFBI), Chair of the Sub-Committee on GM(D)P Harmonisation (SCH);
- Mr Andreas Krassnigg (Austria / AGES), Chair of the Sub-Committee on Expert Circles (SCEC);
- Mr Jacques Morénas (France / ANSM), Chair of the Sub-Committee on Strategic Development (SCSD);
- Mr Tor Gråberg (Sweden / MPA), Chair of the Sub-Committee on Communication (SC COM).



6. To run the SC, the Committee elected 64 SC Members (including SC Chairs and Deputy Chairs). 57% of all SC Members are from Participating Authorities (PA) outside the EU; non-EU PA represent 47% of all PA in PIC/S. The strong involvement of PA outside the EU in the SC structure demonstrates the importance of PIC/S for them.

PIC/S Inspectors' Academy (PIA) is established

7. At its meeting in Paris (France) on 20-21 October 2014, the PIC/S Committee decided to establish the PIC/S Inspectorates' Academy (PIA).

8. PIA is a PIC/S initiative to set up a web-based educational centre. The idea of the PIA was announced during the PIC/S 40th Anniversary in 2011. The concept was originally mooted by Mr Boon Meow Hoe (HSA / Singapore) that PIC/S should create a professional "Inspectors' Academy" delivering a variety of courses ranging from general training to highly specialised training for inspectors (see also box at page 8).

9. PIA will be implemented in various stages and become operational in 2015. It attracts a lot of interest from Non-Members, Partner Organisations, Industry and Professional Organisations.



The PIC/S Inspectors' Academy (PIA), as seen by his mentor Boon Meow Hoe (Singapore / HSA)

One of the key roles and functions that PIC/S provides is training. It is a great challenge and an uphill task to harmonise GMP inspections among different National Drug Regulatory Authorities (NDRA) across the world. An "education centre" is a pragmatic approach to "calibrate" GMP inspectors and to uphold consistency in the interpretation of GMP, the classification of GMP deficiencies, inspection methodology, inspection skills and inspectors' qualification. My sense is that to achieve PIC/S' mission, which is "to lead the international development, implementation and maintenance of harmonised Good Manufacturing Practice (GMP) standards and quality systems of inspectorates in the field of medicinal products", there is a need to formalise all PIC/S training activities. Changes today are taking place at an internet

speed against the backdrop of globalisation. Most NDRAs have a greater workload but simultaneously less financial and human resources. The training activities of PIC/S need to transform and embrace information technology to make training more easily accessible. In addition, considering that PIC/S encompasses all continents, perhaps the need of "decentralized" regional trainings is necessary. As part of my obligation of representing HSA/ Singapore in PIC/S, I regularly update and discuss PIC/S matters with my colleagues in my agency and from these discussions the concept of the Inspectors' Academy was born. The concept is not a novelty: police inspectors have their Academy and so does a fast food operator... so why not GMP inspectors! Inspectors about changes should learn in pharmaceutical technology from the industry; however, inspectors should be trained on "how to inspect" by inspectors. Hence, the need to train the inspectors, the need to "calibrate" inspectors globally, the need to "converge" with a view to harmonise GMP Inspectorates."

New Members, new Applicants

- 10. In 2014, PIC/S welcomed three new Members:
 - On 1st January 2014, the United Kingdom's Veterinary Medicines Directorate (VMD) joined the Scheme as PIC/S' 44th Participating Authority.
 - ➢ On 1st July 2014, both Japan and the Republic of Korea's Regulatory Authorities joined PIC/S: Japan's Ministry of Health, Labour and Welfare (MHLW), the Pharmaceuticals and Medical Devices Agency (PMDA) and the Japanese Prefectures (all three counting as one Participating Authority) became PIC/S' 45th Participating Authority while the Republic of Korea's Ministry of Food and Drug Safety (MFDS) became PIC/S' 46th Participating Authority.
- 11. Two new applications for PIC/S membership were also received:
 - The Croatian Agency for Medicinal Products and Medical Devices (HALMED) applied on 5 September 2014;
 - Mexico's Federal Commission for the Protection from Sanitary Risks Ministry of Health (COFEPRIS) applied on 18 December 2014 having completed the pre-accession process.

COMPLIANCE

12. One of the essential requirements to join PIC/S is that Competent Authorities must have *"the arrangements necessary to apply an inspection system comparable to*

that referred to in this Scheme and whose requirements and procedures could ensure the proper implementation of the Scheme and contribute to its effective operation", as stipulated in paragraph 4 of the PIC Scheme. Being equivalent is not only required for accession but all the time and duly verified during reassessments. This is why compliance to the PIC Scheme is one of PIC/S' most important and critical areas, which needs to be constantly monitored.

13. This task has been entrusted to the Sub-Committee on Compliance (SCC) under chairmanship of Anne Hayes (Ireland / HPRA). For the complete mandate, see box below.

The mandate of the SCC is to:

- 1. Co-ordinate, plan and monitor all assessments, pre-assessments, re-assessments, etc.
- 2. Co-operate with the Secretariat on the validation (i.e. completeness) of (pre)applications
- 3. Plan and review (i) the assessment of Applicants and Pre-Applicants; and (ii) the re-assessment of Participating Authorities (PA)
- 4. Review and assess communications from Inspectorates, which could trigger a reassessment
- 5. Pre-select Rapporteur / Team Leader and auditors who are appointed by the CO
- 6. Review reports and recommendations by Rapporteur / Team Leader
- 7. Monitor and review corrective actions by Applicants and Re-Assessed PA and ensure that they are followed up and fully implemented
- 8. Ensure consistency of assessments and re-assessments (and between them)
- 9. Ensure that Accession, Pre-Accession & Re-Assessment Guidelines (including Questionnaire and Checklist) are implemented / adhered to and make proposals for their amendment
- 10. Define and review the tools used for assessment and re-assessment of PA (e.g. the audit checklist) in close co-operation with interested parties such as the EMA Compliance Group and EU MRA Partners (in particular Health Canada)
- 11. Co-operate with EU Joint Audit Programme, the European Heads of Medicines Agency network and other similar initiatives in order to avoid duplication of work
- 12. Report back to the PIC/S Committee, as provided for in the Terms of References, and summarises discussions on on-going applications
- 13. Make proposals / recommendations

14. The SCC held four teleconferences on 19 March, 8 May, 3 October and 24 October 2014, during which it discussed membership applications, pre-applications, contacts with non-Members, assessment and reassessment procedures and other topics, detailed below.

Membership Applications

15. In the course of 2014, 8 membership applications were in the process of being assessed. The continuous expansion of PIC/S shows that the organisation is dynamic and attractive.

16. The Applicants are the following: (*in alphabetical order*)

Brazil / ANVISA

17. On 8 October 2014, Brazil's Agência Nacional de Vigilância Sanitária (ANVISA) submitted a finalised questionnaire and new supporting documents, thus completing the membership application initially submitted on 30 July 2010.

Croatia / HALMED

18. On 5 September 2014 the Croatian Agency for Medicinal Products and Medical Devices (HALMED) submitted a PIC/S membership application. The Committee agreed in principle to combine the PIC/S on-site assessment with the Canada MRA assessment and the EU JAP assessment during 2015.

Hong Kong / Pharmacy and Poisons Board of Hong Kong

19. The Rapporteur, Tor Gråberg (Sweden / MPA), presented his preliminary evaluation report of the paper assessment of the Pharmacy and Poisons Board of Hong Kong / SAR (PPBHK), which has been reviewed by the SCC. The Committee endorsed the report and the recommendation of the Rapporteur for an on-site visit in 2015.

Iran / MoH

20. Following the resignation of the Rapporteur, Alexander Hoenel (Austria / AGES), a new Rapporteur, Paul Sexton (Ireland / HPRA), was appointed by written procedure on 18 July 2014. Taking into account the change in Rapporteur and the delay incurred in the application process, it was agreed to grant at the request of the Iranian Ministry of Health (MoH) a clock stop for the period 1 January 2014 – 31 December 2014. The assessment process will resume on 1 January 2015.

Japan / MHLW, PMDA & Prefectures

21. Japan applied for membership in March 2012. A paper assessment was conducted and the Committee agreed in principle to combine the PIC/S on-site assessment with the EU-MRA extension assessment on 9-13 September 2013. Due to the size of the assessment and the workload involved, the assessment of Japan implied a larger than usual audit team composed of seven auditors led by Tor

Gråberg (Sweden / MPA). At the Committee meeting of 15-16 May 2014, the audit team recommended to the Committee to accept the PIC/S membership application of Japan's Competent Authorities.



Japanese Delegation with PIC/S Chair



MFDS Delegation with PIC/S Chair & Secretary

Korea (Republic of) / MFDS

22. The Republic Korea applied for membership in April 2012 through the Korean Food & Drug Administration (KFDA). On 23 March 2013, the status of KFDA was elevated to ministerial level and its name was changed to "Ministry of Food and Drug Safety" (MFDS). A paper assessment was conducted in view of the accession of MFDS to PIC/S, followed by a pre-audit visit on 17-18 December 2013 and an on-site visit on 13-17 January 2014. Five a u d i t o r s took part in the audit team under the leadership of Ger Jan van Ringen (Netherlands / IGZ). At the Committee meeting of 15-16 May 2014, the audit team recommended to the Committee to accept the PIC/S membership application of MFDS.

Philippines / PFDA

23. The Rapporteur, Bertrand Perrin (France / ANSM), reviewed the corrective and preventive action plan (CAPA) provided by the Philippines' Food and Drug Administration (PFDA) on 1 May 2014. In response to PFDA's request and due to the need for legislation and QS implementation, the Committee agreed to grant clock stop to PFDA for the period 1 January 2015- 31 December 2015. This clock stop is subject to the provision of a report for Q3 2015 on the implementation status.

Turkey / TMMDA

24. A draft evaluation report of the paper assessment was prepared by the Rapporteur, Anne Hayes (Ireland / HPRA), and Co-Rapporteur, Michel Keller (Switzerland / Swissmedic). However, further information was requested from the Turkey's Medicines and Medical Devices Agency (TMMDA) before proceeding to plan the on-site assessment.

Pre-Applications

25. PIC/S' Accession Guidelines provide for the possibility for a Competent Authority to ask PIC/S to carry out a pre-assessment by a PIC/S auditor. This includes a gap analysis on the basis of which a recommendation may be given to the Competent Authority either to apply for membership or to take the necessary measures in order to comply with PIC/S requirements.

26. In the course of 2014, 6 pre-applications were under review.

27. The Pre-Applicants are: (*in alphabetical order*)

Armenia / SCDMTE

28. The Rapporteur, Mark Cilia (Malta / MAM), prepared a report on the assessment of the CAPA submitted by Armenia / SCDMTE following the gap analysis. The pre-accession of Armenia / SCDMTE was then closed by the Committee.

Belarus / MoH

29. The Rapporteur, Iveta Vilcane (Latvia / ZVA), provided an oral update on the gap analysis of Belarus' Ministry of Health (MoH). Her final report will be tabled at the next Committee meeting in 2015.

Chile / ISP

30. A preliminary gap analysis report on Chile's "Instituto de Salud Pública" (Public Health Institute) was prepared by the Rapporteur, Rachel Shimonovitz (Israel / ISCP) and the Co-Rapporteur, Raquel San José (Spain / AEMPS) and then reviewed by the SCC. The report will be tabled at the next Committee meeting.

Kazakhstan / CCMPA

31. A new Rapporteur, Rosmarie Neeser Zaugg (Switzerland / Swissmedic), was appointed by written procedure on 16 September 2014. The Committee agreed to prolong the pre-assessment period of Kazakhstan's Committee for the Control of Medical and Pharmaceutical Activities (CCMPA) due to the change in Rapporteur.

Mexico / COFEPRIS

32. The report by the Rapporteur, Manuel Ibarra (Spain / AEMPS), on the PIC/S pre-accession application by Mexico's Federal Commission for the Protection from Sanitary Risks – Ministry of Health (COFEPRIS) was endorsed and the Committee invited COFEPRIS to apply for PIC/S accession. A full membership application was received on 18 December 2014.

Uganda / NDA

33. A letter was sent by the PIC/S Chairperson confirming the closure of the preaccession assessment of Uganda / NDA which was the first authority to complete a pre-accession process since the introduction of this new procedure.

Reassessment of Participating Authorities

34. In order to ensure that both new applicants and older members fulfil the same requirements, a Joint Reassessment Programme (JRP) was introduced in 2000 under which existing PIC/S members are also reassessed for equivalence on a regular basis.

The JRP is run in parallel with the EU's Joint Audit Programme (JAP) and uses basically the same tools. JAP assessments and JRP reassessments are deemed equivalent.

35. In 2014, the PIC/S Committee agreed in principle to reassess Malaysia / NPCB in 2015 and Singapore / HSA at a later stage.

36. The SCC also proposed to introduce a desktop review under the Joint Reassessment Programme (JRP) along the lines of the desktop review in the EU JAP audit procedure. The idea is to develop a desktop review in order to decide on whether an on-site audit is necessary or not; if yes, whether it should be a full on-site audit or a less detailed audit.

Non-Members

37. Close contacts were kept with a number of non-Members of which China's Food and Drug Administration (CFDA) and Thailand / Thai FDA. Thai FDA announced that it would reapply for membership in 2015.

Evaluation and Re-evaluation Procedures

38. The SCC drafted guidance documents, notably on process flow and gap analysis, for the pre-accession procedure, which are intended to guide future (Pre) Applicant Authorities and assist them in deciding between pre-accession or accession.

39. A Note on the main principles for travelling related to on-site assessment visits was approved in principle by the Committee, subject to some minor changes.

40. The SCC also discussed the drafting of a guideline for interpreting the Audit Checklist in collaboration with the EMA Compliance Group.

41. A footnote on pharmacovigilance was added to the Audit Checklist, which is used by EMA, Canada and PIC/S for purposes of assessing inspectorates from Medicines Regulatory Authorities.

Corrective Action or updates by recently acceded PIC/S PA

42. Chinese Taipei / TFDA, Japan / MHLW & PMDA, Korea (Republic of) / MFDS, New Zealand / Medsafe, and UK / VMD updated the SCC and the Committee on corrective actions or outstanding issues, which had to be addressed following their accession to the Scheme.

Training and Qualification of PIC/S Rapporteurs and Assessment Teams

43. A joint EMA and PIC/S training event for auditors took place in London (UK) on 27-28 October 2014. The event was attended by auditors operating in the frame of the EU Joint Audit Programme (JAP) and the PIC/S Assessment and Joint Reassessment Programme (JRP). During this training, which was recorded, a proposal was made to share a registry of qualified auditors between PIC/S and EMA.



Panel of speakers, joint EMA and PIC/S training of auditors, October 2014, EMA HQ, London (UK)

GMDP

44. The harmonisation of Good Manufacturing Practice (GMP) and – more recently – of Good Distribution Practice (GDP is at the very heart of PIC/S. As mentioned in the PIC/S Blueprint, the main reasons for adopting common standards are:

- to ensure the maintaining of high standards of quality assurance in the development, manufacture and control of medicinal products;
- to promote uniformity in licensing decisions;
- to promote consistency and uniformity of inspections;
- to facilitate the removal of barriers to trade in medicinal products.

45. The main instrument for harmonisation has been the PIC/S GMP Guide, which PIC/S is striving to keep equivalent in terms of GMP requirements with the EU GMP Guide. Close co-operation with the EMA is thus essential.

46. The mandate of the Sub-Committee on the Harmonisation of GM(D)P (SCH), chaired by Paul Gustafson (Canada / HPFBI), is to harmonise GMP, establish best inspection practices and harmonise the interpretation of GMP to ensure consistency in inspection / audit practices. For the complete mandate, see box below.

The mandate of the SCH is to:

- 1. Harmonise GM(D)P and establish best inspection practices
- 2. Ensure the harmonisation and the equivalence of the PIC/S GMP Guide with the EU GMP Guide
- 3. Encourage the uniform interpretation and application of GM(D)P
- 4. Co-operate and work closely together with the EMA, the GMDP IWG, the EDQM and WHO in the field of GM(D)P harmonisation and best practices
- 5. Co-ordinate with the PIC/S EMA Liaison Officer and the EMA representative the involvement of PIC/S Experts in EMA GMDP IWG on revision of the GMP Guide, Annexes, Q&A and other relevant guidance documents

- 6. Make proposals for the drafting of new guidance documents (Aide-Memoire, recommendations, etc.) on the basis of best inspection practices and co-ordinate their revision
- 7. Review activities, mandates, etc. of Working / Drafting Groups dealing with the harmonisation of GM(D)P in particular Joint Drafting Groups working on the revision of the EU-PIC/S GMP Guide
- 8. Harmonise the interpretation of GMP to ensure consistency in inspection / audit practices
- 9. Supervise the finalisation of guidance documents arising from PIC/S Seminars
- 10. Identify possibilities for promoting international harmonisation in the field of GM(D)P
- 11. If the Chair of the SCH is not attending EMA GMDP WG meetings, appoint a Liaison Officer
- 12. Report back to the PIC/S Committee, as provided for in the Terms of References, and make proposals / recommendations

47. The SCH held four teleconferences on 6 February, 5 June, 11 September and 27 November 2014, during which it discussed the revision of the PIC/S GMP Guide and the drafting of guidance documents. It also monitored and reviewed the work carried out by Working Groups, detailed below.

Working Groups under SCH

48. Three Working Groups are operating under SCH.

Working Group on Harmonisation of the Classification of Deficiencies

49. The goals and proposed Terms of Reference (ToR) for the Working Group on Harmonisation of the Classification of Deficiencies, led by Jenny Hantzinikolas (TGA / Australia), were endorsed by the SCC and the Committee. The work carried out by this WG is crucial in ensuring a uniform approach in terms of classification of deficiencies across PIC/S PA, in particularly for risk assessment.

Working Group on Annex 1 / Sterile Manufacturing

50. The PIC/S Committee adopted a mandate for the Working Group on Annex 1 / Sterile Manufacturing at the Rome meeting and asked it to conduct preliminary discussions on whether Annex 1 should be completely rewritten or whether its Technical Interpretation should be updated. The WG came to the conclusion that Annex 1 should be completely revised. At the Paris PIC/S Committee meeting the WG was merged in order to establish a joint PIC/S-EMA Drafting Group in view revising Annex 1 jointly with the EMA. The Drafting Group is led by Andrew Hopkins (UK / MHRA) and includes representatives of the Competent Authorities of PIC/S and EEA.

Working Group on Advance Therapy Medicinal Products (ATMPs)

51. The PIC/S Committee established a Working Group on Advance Therapy Medicinal Products (ATMPs) whose objective is to draft a PIC/S Aide-Memoire on ATMPs. The WG is chaired by Annie Rietveld (Netherlands / IGZ).

Revision of the PIC/S and EU GMP Guides and Annexes

52. The SCH actively continued to harmonise GM(D)P guidance documents with the EU, in particular the PIC/S and EU GMP Guides and Annexes, and to submit revisions for adoption to the PIC/S Committee.

53. This was notably the case of the revised Annexes 2 and 14 of the PIC/S GMP Guide, which entered into force on 1^{st} March 2014. The consultation of non-EEA PA of PIC/S on Chapters 1, 2, 6 and 7 ended on 30 September 2014. Comments received during the consultation will be reviewed by the SCH.

54. PIC/S experts were also invited to join an EMA Drafting Group on the revision Annex 15 (Qualification & Validation) of the EU GMP Guide.

Guidance Documents

55. All PIC/S guidance documents are available on the PIC/S website <u>http://www.picscheme.org</u>.

GDP Guide

56. The PIC/S Committee adopted a Guide on Good Distribution Practice (GDP), which entered into force on 1 June 2014. The PIC/S GDP Guide is based on the EU GDP Guide and was adapted to PIC/S' needs by the PIC/S Expert Circle on GDP. While the EU GDP Guide is legally binding in the EU/EEA, the PIC/S GDP Guide is a voluntary guidance document in PIC/S, as not all PIC/S Participating Authorities are competent for GDP inspections.

57. The GDP Guide lays down appropriate tools to assist wholesale distributors in conducting their activities and to prevent falsified medicines from entering the legal supply chain. Compliance with these guidelines will ensure control of the distribution chain and consequently maintain the quality and the integrity of medicinal products.

Guide to Good Practices for the Preparation of Medicinal Products in Healthcare Establishments

58. Following the successful adoption of a new Annex 3 on radiopharmaceuticals, the revised PIC/S Guide to Good Practices for the Preparation of Medicinal Products in Healthcare Establishments entered into force on 1st March 2014.

Guidance document on "foreign inspections"

59. The SCH drafted a guidance document on "foreign inspections" focusing on the prior notification of a GMP inspection by a PIC/S PA to another PIC/S PA. A PIC/S-internal consultation on the draft was launched on 2 October 2014 with comments by 31 December 2014.

EMA guidance documents

60. The SCH also reviewed a number of EMA guidance documents and recommended, pending review of the final published versions, that PIC/S takes over and adapts the following EMA documents:

- Guidelines on the formalised risk assessment for ascertaining the appropriate Good Manufacturing Practice for excipients of medicinal products for human use;
- Guidelines on the principles of Good Distribution Practices for active substances for medicinal products for human use;
- Procedure for handling falsification in the context of GMP/GDP compliance;
- Draft EMA guideline on setting health-based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities (to be read in relation with the revised Chapters 3 & 5 of the EU-PIC/S GMP Guide).

PIC/S Library

61. The SCH successfully completed a pilot trial on the establishment of the PIC/S library, which will include documents related to GM(D)P inspection drafted by Members and Partners. A call was made to PIC/S Participating Authorities to contribute to the library.

TRAINING

62. Harmonising GMP requirements through the PIC/S GMP Guide is not sufficient to ensure a uniform interpretation and application of GMP. The training of GMP inspectors is an essential tool to achieve this goal. This is why the training of GMP inspectors is an essential activity of PIC/S. Recently, PIC/S has also opened its training tools to inspectors active in other areas such as Good Distribution (GDP) and Good Clinical Practices (GCP).

63. The Sub-Committee on Training (SCT), led by Boon Meow Hoe (Singapore / HSA), is the oldest Sub-Committee and was initially established as a Working Group under the PIC/S Committee. It met three times in 2014: on 8 May, on 1 October and on 24 October 2014. Its mandate has remained by and large the same over the past decades – see box below.

The mandate of the SCT is to:

- 1. Identify training needs
- 2. Co-ordinate and monitor PIC/S training activities
- Review the planning and organisation of annual training seminars, in particular:
 propose and validate the seminar topic,
- review the seminar programme,
- assess the seminar report,
- make recommendations for future seminars,
- propose amendment to the Aide Memoire on the Organisation of Seminars (PI 003).

4. Monitor the Joint Visits Programme and the Coached Inspection Programme and carry out a review of reports in order to identify divergences on GMP interpretation and inspection practices

5. Ensure the rotation of training between the various regions, taking into consideration the expansion of PIC/S

6. Consider proposals for co-operation with professional organisations (e.g. ISPE, PDA) in the field of training

7. Report back to the PIC/S Committee, as provided for in the Terms of References, and make proposals / recommendations

64. The following PIC/S training activities were held in 2014 (in chronological order):

- Expert Circle on Good Distribution Practices in Warsaw (Poland) on 25-27 March 2014, organised by Poland / MPI;
- Expert Circle on API in Rome (Italy) on 19-21 May 2014, hosted by Italy / AIFA;
- PIC/S HPRA New Inspector Training Course, hosted and run by Ireland / HPRA, on 16-19 June 2014 in Dublin (Ireland);
- PIC/S Train the Trainer course, hosted and run by Ireland / HPRA, on 20 June 2014 in Dublin (Ireland);
- PIC/S PDA Q7 Training Course in Brussels (Belgium), on 18-19 September 2014;
- PIC/S 2014 Seminar on "Dedicated Facilities or not" on 22-24 October 2014 in Paris (France), hosted by France / ANSM;
- Joint EMA and PIC/S training of auditors operating in the frame of the EU Joint Audit Programme (JAP) and the PIC/S Assessment and Joint

Reassessment Programme (JRP) held at the EMA in London (UK) on 27-28 October 2014;

PIC/S Advanced QRM Training Course in Tokyo (Japan) on 8-10 December 2014, hosted by Japan / PMDA



Annual Training Seminar

65. PIC/S arranges every year a Training Seminar for inspectors, with each Seminar dealing with a specific topic and hosted by a different PIC/S Participating Authority. The SCT, jointly with the PIC/S Committee, reviews the organization and outcome of annual seminars in line with the PIC/S Aide Memoire on the Organisation of Seminars, which was revised and entered into force on 1 February 2014.

2013 Seminar

66. The evaluation report on the 2013 Seminar, organized by Canada / HPFBI in Ottawa (Canada) on 9-11 October 2013, was reviewed by the SCT and the PIC/S Committee. The seminar's topic was "GMP impacts on the Global Supply Chains" (for both API and solid dosage forms). For more details, see the Annual Report for 2013.

2014 Seminar



67. A PIC/S Seminar was organised by the French National Agency for Medicines and Health Products Safety (Agence nationale de sécurité du médicament et des produits de santé – ANSM) in Paris, France, on 22-24 October 2014. The topic of the seminar was the management of "dedicated facilities".

68. For years this subject has been a strategic issue for both industry and regulators, in particular the risk management of potential cross-contamination when toxicologically sensitive products are manufactured such as highly sensitising materials (i.e. penicillin), sexual hormones, cytotoxics, highly active or potent products, ectoparasiticides or vaccines. The impact of "dedicated facilities" is very significant with regards to public health and decisions made by industry in designing and operating manufacturing sites.

69. The Seminar, which is the second in the recent history of PIC/S organised in France, was attended by 156 participants from 56 countries. All continents were represented. The Seminar's objectives were to discuss about design, implementation and management of dedicated facilities as well as inspection strategies. The harmonisation of approaches on this topic is a critical point for both inspectors and

industry. The 2.5 day Seminar started with a series of lectures and presentations, followed by four parallel workshops on the 2^{nd} day of the Seminar.



2014 Seminar in Paris (France) - Official photo with participants

- 70. The workshops dealt with:
 - The impact of personnel movement between dedicated and non-dedicated facilities (Workshop Leader: Canada / HPFBI);
 - Dedicated and non-dedicated facilities applied to veterinary medicinal products (Workshop Leaders: France / ANSES and UK / VMD);
 - The identification of cross-contamination and/ or risk analysis using the ISPE risk-map (Workshop Leader: Poland / MPI);
 - The impact of the airborne transfer of non-viable particles when introducing a new active substance in a non-dedicated workshop (Workshop Leader: France / ANSM).

71. During the last day of the Seminar, a summary of the outcome of the workshops was presented followed by a discussion on the follow-up to be given to the Seminar. Inspectors agreed to establish a PIC/S Expert Circle on Dedicated Facilities, which will have the task to draft an Aide Memoire on the inspection of dedicated facilities, as well as to provide training to inspectors on this difficult issue.

72. The Aide Memoire will focus on harmonising terminology used in relation with dedicated facilities as well as propose definitions, which are internationally acceptable. Questions that inspectors should ask themselves during inspections should also be listed – in particular in relation with the risk management of companies on dedicated facilities. According to a PIC/S survey, 60% of all inspectors have not received any training in this critical field: as a result, the Expert Circle will work on a training programme for inspectors.

73. The Expert Circle will start as a Working Group in charge of elaborating a mandate for the future Expert Circle. The following PIC/S Participating Authorities

have committed to provide the necessary support to the PIC/S Expert Circle (in alphabetical order): Argentina / INAME, France / ANSM, Ireland / HPRA, Italy / AIFA, Poland / MPI, South Africa / MCC, UK / MHRA, and US FDA. Some Partner Organisations such as WHO will also be associated in the work of the Expert Circle.

Future seminars

- 74. The SCT reviewed the preparations of the 2015 and 2016 seminars:
 - Indonesia / NADFC will host the 2015 Seminar in Nusa Dua (Indonesia) from 7-9 October 2015. The Seminar will be on "Biopharmaceuticals (Biotechnology and Biologicals): How to inspect".
 - UK / MHRA will host the 2016 Seminar on 6-8 July 2016 in Manchester (UK) on "Inspectorates of the Future".

Joint Visits Programme / Coached Inspection Programme

75. At the end of 2014, there were approximately 20 active Joint Visit Groups involving around 60 inspectors in the PIC/S Joint Visits Programme (JVP). The JVP is an essential PIC/S tool helping to ensure global GMP harmonization (see box below).

PIC/S Joint Visit Groups

Another means of training inspectors of the PIC/S countries has been devised in the form of joint visits to manufacturers by inspectors of different countries. Groups of three inspectors are set up on the basis of applications sent to the PIC/S Secretariat. Each inspector is assigned within his/her group to act in turn as host for one year and guest for the other two years.

Visits are carried out in English or in a language commonly agreed by inspectors. Joint reports are drafted after each visit and sent to the Committee for evaluation.

The organisation of the joint visits has proved an excellent means for the further training of inspectors through mutual exchange of experience and a useful contribution to the maintenance of mutual confidence between competent authorities. Participants have also the possibility to discuss and compare their inspection methods and their interpretation of GMP rules.

- 76. The SCT proposed 3 measures to encourage participation in the JVP, namely:
 - survey the reasons why some PA do not participate;
 - > explore the creation of regional groups (to reduce costs);
 - > incite Expert Circles to promote the JVP in their fields of competence.

PIC/S International Training Programme on API

77. The API International Training Programme (API ITP) is run by the Expert Circle on API under the chairmanship of Carmelo Rosa (US FDA) with the active

support of the PIC/S Secretariat. It consists of three segments: the PIC/S-PDA Q7 Training, open to regulators and industry; the Advanced Training for regulators; and the Q&A.

- The Q7 training, which focuses on familiarisation with ICH Q7, is for both industry and regulators; it is organised jointly by PIC/S and the Parenteral Drug Association (PDA);
- The advanced training on API inspection, focusing on improving the skills of inspectors and sharing approaches for addressing contemporary issues, is for regulators only;
- The Q&A on ICH Q7 is on the interpretation of the requirements of ICH Q7 and is open to both industry and regulators.

78. One of the priorities of the API Expert Circle is to have the Q7 training recorded in view of the development of e-learning modules, to be later integrated into the PIA project (see paragraph 84).

79. Two Q7 Training courses were successfully organized in 2014: the first took place in Johannesburg (South Africa) on 18-19 March 2014; the second was organized in Brussels (Belgium) on 18-19 September 2014 and provided an opportunity for cooperation with the European Commission, which attended in person; APIC whose Chairman participated as speaker; and ICH, which helped promote the event.

- 80. Other Q7 training sessions are planned in 2015 in:
 - Korea (Republic of) on 22-23 January 2015, with the support of Korea / MFDS;
 - ▶ Brazil on 10-12 February 2015, with the support of Brazil / ANVISA;
 - ▶ India, scheduled for September 2015.
 - China (not confirmed yet).

PIC/S New Inspector Training Course and Train the Trainer Course

81. A PIC/S – HPRA (Ireland) New Inspector Training Course ("NITC") took place from 16-19 June 2014 in Dublin (Ireland), followed by a Train the Trainer Course on 20 June 2014.

82. The aim of the Train the Trainer Course is to train future trainers and to make the best use of the training material for the organisation of regional / national trainings.

PIC/S Inspectors' Academy (PIA)

83. The PIC/S Inspectors' Academy (PIA) is a project run by the Ad-Hoc PIA Working Group and the SCT, both placed under the chairmanship of Boon Meow Hoe (Singapore / HSA).

84. PIA is a PIC/S initiative to set up a web-based educational centre under the PIC/S umbrella and to provide harmonized, standardised GMP training at an international level. PIA will not only deliver general or advanced training but also serve as a platform for discussion and sharing among regulators thus contributing to global harmonisation and interpretation of GMP. The initiative already benefits from a

strong support from Head of Agencies, PIC/S Members (and non-Members) as well as interested Partner Organisations and Third Parties. It will be implemented in 3 independent stages.

85. The proposal to establish the PIA and launch stage 1 of the project was adopted by the Committee at its meeting in Paris. A PIA Project Management Steering Committee ("PMSC"), which replaces the Ad-Hoc PIA Working Group, was also appointed. The PMSC will be in charge of the development and implementation of the PIA project.

Joint Training with Professional and Other Organisations

86. The SCT and the PIC/S Committee continued to discuss proposals for joint training events with ISPE and PDA.

87. A side-meeting with IFPMA took place in the margins of the Committee meeting in Rome (Italy) on 16 May 2014 in order to discuss IFPMA proposal to facilitate (i) the provision of training material for the PIA and (ii) industry-wide consultations.

EXPERT CIRCLES

88. PIC/S Expert Circles have been set up by the PIC/S Committee to facilitate the discussions and the exchange of information among inspectors specialised in a specific area of GMP such as blood, computerised systems, active pharmaceutical ingredients, quality risk management, etc. Expert Circles meet regularly to develop draft guidance, recommendations, etc. and offer training in their respective fields of specialisation.

89. Until 2013, the training activities of Expert Circles were monitored by the Sub-Committee on Training while the activities related to guidance documents were placed under the direct supervision of the PIC/S Committee. With the new SC structure and considering the increase of activities of Expert Circles, it was decided to establish a specific SC: the Sub-Committee on Expert Circles (SCEC). The main task of the SCEC is to review the composition and functioning as well as the various mandates of the Expert Circles. The mandate of the SCEC is detailed in the box below.

The mandate of the SCEC is to:

- 1. Identify the need to create / terminate Expert Circles
- 2. Co-ordinate and monitor activities and meetings of Expert Circles

3. Ensure that activities of Expert Circles are in line with their respective mandates, as approved by the PIC/S Committee, as well as with the Guidelines for PIC/S Expert Circles (PI 022)

4. Review the planning and organisation of Expert Circles meetings, in particular:
validate the yearly objectives as well as meetings' objectives

- review the programme
- assess the meeting report
- make recommendations for future meetings
- ensure that Guidelines on Expert Circles are implemented / adhered to
- propose amendment to the Guidelines on Expert Circles

5. Report back to the PIC/S Committee, as provided for in the Terms of References and make proposals / recommendations

90. Following the resignation of the SCEC Chairman, Alexander Hoenel (Austria / AGES), in early 2014, the Committee elected in Rome Andreas Krassnigg (Austria / AGES) as the new Chairman. The SCEC held one teleconference 10 September 2014.

Expert Circle on API

91. The Expert Circle on Active Pharmaceutical Ingredients (API) is chaired by Carmelo Rosa (US FDA) and has been actively involved in the following activities:

- Revision of the Q7 training material and planning of future training (including development of e-learning modules);
- Questionnaire on API findings for PIC/S Participating Authorities;
- Request for further support from PIC/S Participating Authorities with regards to the Q7 training (speakers) and the need for a host for the 2016 EC on API meeting.
- Revision of the PIC/S Aide-Memoire on the Inspection of APIs (PI-030-1) by the drafting of the missing sections 5 and 19;
- Drafting of a procedure for Joint API inspections on the basis of the PIC/S Team Inspection SOP;
- Reviewing the preparations and the report on the 6th meeting hosted by AIFA / Italy in Rome on 19-21 May 2014 (see box below);
- Organisation of the 7th meeting to be hosted by EDQM in Strasbourg (France) on 20-22 October 2015;
- Revision of the mandate of the Expert Circle.



The 6th meeting of the PIC/S Expert Circle on APIs was held back-to-back with the PIC/S Committee meeting in Rome (Italy) from 19-21 May 2014, hosted by the Italian Medicines Agency (AIFA). part of the PIC/S As International API Training Programme, an advanced training for inspectors in APIs was delivered. The meeting was attended by more than 120 delegates from regulatory agencies, including PIC/S Members and non-Members, originating from 45 different countries from Europe, the Americas, Asia and Africa.

This advanced training event was a unique occasion for regulators to discuss and explore technical topics related to the production and control of active pharmaceutical ingredients as well as benefit from training specifically aimed at the inspections of manufacturers of APIs. It also provided participants with the opportunity to harmonise inspection approaches in this field as the quality of active pharmaceutical ingredients, within the global supply chain, can be ensured only if regulatory agencies work together in the harmonization of standards of inspection. The overall objective of the meeting was to strengthen international co-operation and share experience in the field of inspections. The topics of the meeting, divided into plenary sessions and workshops, were process validation and cleaning validation as well as "contemporary issues" such as counterfeiting, data integrity and heparin inspections.

Expert Circle on GDP

92. The Expert Circle on Good Distribution Practice (GDP) is one of the most recent Expert Circles. It is chaired by Steve Todd (UK / MHRA), who replaced Audny Stenbråten (Norway / NOMA) in the course of 2014. Following the first successful meeting in Helsinki (Finland) on 11-13 June 2013, the Expert Circle held a 2^{nd} meeting in Warsaw (Poland) on 25-27 March 2014, which was organised by Poland / MPI. The PIC/S Committee endorsed the new mandate of the Expert Circle at its meeting in Rome.

Expert Circle on QRM

93. Following the completion of its first mandate, a second mandate has been given to the Expert Circle on Quality Risk Management (QRM). This is the reason why it is referred to as "The Second Expert Circle on QRM". The Expert Circle is chaired by Kevin O'Donnell (Ireland / HPRA).

94. The Expert Circle convened in Washington DC (USA) on 10-12 March 2014 for a meeting, which was hosted by US FDA. During this meeting, it discussed – amongst other matters – the organisation of 3 Advanced QRM Training Courses to be held between 2014 and 2016. The first such course took place in Tokyo (Japan) on 8-10 December 2014 and was organised by Japan / PMDA. The second and third courses will be held in in the USA in 2015 and in Europe in 2016.

Expert Circle on Computerised Systems

95. The Expert Circle on Computerised Systems usually meets every second year only. No meeting took place in 2014. In 2014, the Co-ordinating Committee of the Expert Circle elected Karl-Heinz Menges (Germany / Regierungspräsidium Darmstadt) in replacement of Dragana Milic (Australia / TGA). The Expert Circle continued working on a revision of the "PIC/S Guidance Document on Good Practices for Computerised Systems in regulated GxP environments" (PI 011-3).

Expert Circle on Human Blood, Tissues, Cells & ATMP

96. The Expert Circle on Human Blood, Tissues and Cells is the oldest Expert Circle in PIC/S. The 20th meeting of this Expert Circle was held in Taipei (Chinese Taipei), on 9-14 September 2013. However, for the first time in the Expert Circle's

history, no organiser was found to host the next meeting. In addition, the Chairperson of the Expert Circle, Susanne Douglas (Australia / TGA), resigned shortly after the meeting and Fewzi Teskrat (France / ANSM) took over as acting Chairman.

97. The Committee discussed the future of the Expert Circle on Blood, Tissues and Cells and agreed to establish a new Working Group in charge of (i) organising the next meeting of the Expert Circle and (ii) elaborating a new mandate, which should also cover ATMPs.

98. As Italy / AIFA volunteered to organise the next meeting, the new Working Group comprises Italy / AIFA (Organiser of next meeting), Chinese Taipei / TFDA (Organiser of the previous meeting) and the Chairman of the SCEC.

Proposal for an Expert Circle on Medicinal Products for Veterinary Use

99. Based on a survey on veterinary competencies of PIC/S PA, the Committee agreed in principle to set up an Expert Circle on medicinal products for veterinary use. France / ANSES was mandated to draft a mandate.

- 100. According to the survey,
 - > 21 out of 46 PIC/S PA are competent only for human medicines;
 - > 22 out of 46 PIC/S PA are competent for both human and veterinary medicines;
 - > 3 out of 46 PIC/S PA are competent only for veterinary medicines.

WG on GCP / GVP

101. With respect to the project of extending PIC/S' mandate from GMP to new fields such as Good Clinical Practices (GCP) and Good Pharmacovigilance Practices (GVP), the PIC/S Working Group on GCP and GVP continued its discussion under the leadership of Vincent Yeung (UK / MHRA) and then Mandeep Rai (UK / MHRA). This Working Group has the task of developing in particular possibilities for training and joint inspections in the field of GCP and GVP, in co-operation with the European Medicines Agency (EMA). The WG held two teleconferences (the first on 2 July and the second on 15 October 2014) during which it discussed several issues such as drafting terms of reference, establishing a list of GCP contacts or setting up JVP groups.

STRATEGIC DEVELOPMENT & CO-OPERATION

102. The Sub-Committee on Strategic Development was set up in 2009 in order to discuss, amongst other matters, the outcome of a survey on how to improve the operation of the Scheme. Following a suggestion by the Irish Medicines Board to establish more Sub-Committees under the PIC/S Committee, the SCSD elaborated a concrete proposal on how to set up and implement a Sub-Committee structure.

103. The mandate of the SCSD is to define PIC/S' strategy and future policy and make proposals on how to improve the structure and the operation of PIC/S as well as co-operation with PIC/S Partners. For the full mandate, see box below.

The mandate of the SCSD is to:

1. Define and review PIC/S strategy and (future) policy

2. Make proposals / recommendations on how to improve the structure and the operation of PIC/S

3. Ensure the implementation of strategical policies (e.g. roadmaps such as the Blueprint) as well as strategical decisions

4. Discuss new projects for PIC/S and make proposals on the possible "expansion" of PIC/S' mandate to other areas

5. Address implementation of new projects and resource management – in particular funding (e.g. external) – in consultation with PIC/S PA and Heads of Agencies

6. Review co-operation with Partners and make proposals / recommendations for the possible improvement of the co-operation

7. Promote the participation of authorities interested in the PIC Scheme

8. Report back to the PIC/S Committee, as provided for in the Terms of References and make proposals / recommendations

104. The SCSD is chaired by Jacques Morénas (France / ANSM). It held one teleconference on 19 June 2014 and carried out a number of written consultations on various subjects ranging from drug shortage to same scope inspections.

Drug Shortage

105. The SCSD and then the Committee discussed whether PIC/S should be involved in the issue of drug shortages. They noted that a number of other organisations, in particular professional organisations such as ISPE and PDA had published documents on this important topic. However, the topic covered a large ground and involved only partially GMDP inspectors. The Committee referred back the issue to the SCSD for further discussion.

International Coalition of Medicines Regulatory Authorities (ICMRA)

106. Following a presentation given on ICMRA, the PIC/S Committee discussed how to best co-operate with Heads of Agencies. Some Members expressed concerns on the risk of duplication of activities between PIC/S and ICMRA. PIC/S should endeavour to support the Heads of Agencies but advise ICMRA at the same time not to create a parallel system to PIC/S. PIC and PIC/S already provide a comprehensive system notably on the sharing of information based on the equivalence of Inspectorates' GMP systems. The Committee acknowledged that ICMRA's objectives, in particular the better use and sharing of resources globally, would also benefit PIC/S. ICMRA was encouraging non-PIC/S Members to consider PIC/S membership. Consequently, a close co-operation should be established between the two organisations.

Voluntary Acceptance of Same Scope Inspection Results

107. The Committee discussed a Note by the SCSD on the Voluntary Acceptance of Same Scope Inspection Results and agreed to carry out a survey on the current status of GMP-related information exchanged within PIC/S and with non-PIC/S Members – in particular ICMRA Members. The survey will allow to map who is sharing information with whom.

Other Projects

Mapping of GMP Competences

108. The Committee noted that the survey on GMP competences had been successfully completed. The replies from all 46 PA regarding their competences to inspect certain categories of medicinal products were available on the password restricted part of the PIC/S website.

PIC/S Involvement

109. The Secretariat provided an update on the compilation and assessment of the involvement of PA in PIC/S, based on the outcome of the questionnaire. The replies from 4 PIC/S PA were still missing and some data needed to be cross-checked in order to ensure all data compiled were accurate.

Co-operation with Associated Partners and other Organisations

Associated Partners (EDQM, EMA, UNICEF and WHO)

110. PIC/S continued to co-operate with its Associated Partners, namely EDQM, EMA, UNICEF and WHO.

111. Close co-operation was maintained with the European Medicines Agency (EMA), in particular in the field of harmonisation of GMP guides and guidance documents.

112. The PIC/S-WHO Liaison Officer participated in the WHO Expert Committee on Specifications for Pharmaceutical Preparations meeting. The partnership agreements with WHO, which is under revision in order to include a clause on confidentiality, is with the WHO legal department.

Other organisations

ASEAN

113. Indonesia / NADFC, acting as PIC/S – ASEAN Liaison Officer, provided regular updates on activities in ASEAN, which were of possible interest to PIC/S such as the assessment of Thai FDA under the Sectoral Mutual Recognition Arrangement

(MRA) on Good Manufacturing Practice (GMP) or the work accomplished by the Task Force on ASEAN Regulatory Framework for Traditional Medicines and Health Supplements. Information was also shared on meetings of the Pharmaceutical Product Working Group (PPWG) of ASEAN Member States and the Joint Sectoral Committee (JSC) on GMP Inspection of Manufacturers of Medicinal Products (JSC GMP MRA). A special meeting of the PPWG was held on 10-11 March 2014 in Yangon (Myanmar).

Heads of EEA Medicines' Agencies

114. PIC/S was still awaiting a reply from EEA Heads of Medicines' Agencies on the proposed recognition of audits between HMA (Joint Assessment Programme) and PIC/S (Assessment & Re-Assessment).

ICH

115. The SCSD Chairman reported on the new ICH Q12 document on "Technical and Regulatory Considerations for Pharmaceutical Product Lifecycle Management", which is complimentary to Q8, Q9, Q10 and Q11.

116. Switzerland / Swissmedic provided an update on the ICH Q&A on API. Approx. 60 Q&A were reviewed at the ICH Q7 IWG meeting in November 2014. The ICH Q&A is based on a PIC/S Q&A document on Q7, which was transferred to ICH in November 2013.

ISPE

117. The former PIC/S Chairperson, Helena Baião (Portugal / INFARMED IP), was invited to participate in the ISPE Annual Meeting in the USA.

BUDGET, RISK & AUDIT

118. The Sub-Committee on Budget (SCB) was established in 2004, when PIC/S became an independent organisation with its own finances. Between 2004 and 2013, the SCB operated under the supervision of the Executive Bureau. With the new Sub-Committee structure, the SCB has become a Sub-Committee under the PIC/S Committee. Its mandate has also been widened to encompass issues related to risk and audit. For the full mandate, see box below.

119. The Sub-Committee on Budget, Risk and Audit (SCB) is chaired by Paul Hargreaves (UK / MHRA). It held one teleconference on 26 September 2014 during which it discussed mainly financial issues.

The mandate of the SCB is to:

1. In line with good governance:

1.1 Assess regulatory risk, financial risk, reputational risk and risk management and make proposals / recommendation to minimise such risk

1.2 Appraise the performance, efficiency, effectiveness and adequacy of internal and external controls

1.3 Evaluate internal and external audits and the implementation of their recommendations

1.4 Ensure that PIC/S adheres to good governance practices

2. In line with PIC/S' Financial Rules (PS/W 1/2004):

2.1 Establish a budget proposal to the PIC/S Committee

2.2 Propose updates and amendments of the Financial Rules to ensure effective financial administration, the exercise of economy and consistency in financial reporting

2.3 Maintain an internal financial control and examine financial transactions in order to ensure:

(i) the regularity of the receipt, custody and disposal of all funds and other financial resources of PIC/S;

(ii) the conformity of commitments and expenditures with the budget voted by the PIC/S Committee;

(iii) the efficient and economic use of the resources of PIC/S.

2.4 Avoid any duplication with the external auditor

3. Report back to the PIC/S Committee, as provided for in the Terms of References and the Financial Rules, and make proposals / recommendations

2013 Accounts

120. As recommended by the SCB, the Committee approved the Statement of Accounts for the Financial Year 2013 and agreed to transfer the 2013 balance (CHF 4,160.39) to the PIC/S Reserve Fund. It also discharged the Secretary of his responsibility for the financial year 2013 in line with PIC/S' Financial Rules. It noted the financial audit of the 2013 accounts by the external auditor, Moores Refidar S.A.

121. The SCB reviewed the financial part of the report of the Seminar 2013 and found it to be very clear and detailed.

2014 Accounts

122. The status of expenses and income as of 30 April 2014 and as of 30 September 2014 were reviewed by the SCB. Questions were addressed to the Treasurer, who provided adequate explanations.

123. The Committee appointed the external auditor, Moores Refidar S.A., for the financial audit of the 2014 accounts. It approved that the audit should be standard with a particular focus on expenses subject to the EC grant.

124. The Committee approved the 2015 Budget for an amount of CHF 632,700. It also authorized the signing of a contract with the EC which would enable PIC/S to receive a \in 50,000 grant to support the PIC/S training course on Q7 (API) between December 2014 and November 2015.

COMMUNICATION

125. PIC/S regularly communicates on its activities through press releases, annual reports and – since the start of millennium – its web site. Good communication between Participating Authorities through PA representatives is one of PIC/S' recognised benefits, which derives from membership. Communication has also become an important tool to promote PIC/S. As a result, the PIC/S Committee has decided to establish a specific Sub-Committee on Communication.

126. The mandate of the SC COM is to (i) monitor PIC/S' public relations and the exchange of information; and (ii) to define a communication strategy in order to better promote PIC/S and its key role in the field of inspections. For the complete mandate, see box below.

The mandate of the SC COM is to:

1. Monitor PIC/S' public relations and the exchange of information

2. Define a communication strategy to better promote PIC/S

3. Monitor and propose changes to the PIC/S web site

4. Work on improving communications with PA, in particular with Heads of Agencies, as well as PIC/S Partners

5. Identify the most suitable speakers for (regional or international) conferences where PIC/S has been invited to speak

6. Report back to the PIC/S Committee, as provided for in the Terms of References and make proposals / recommendations

127. The Sub-Committee on Communication (SC COM) held a teleconference on 30 September 2014 under the chairmanship of Tor Gråberg (Sweden / MPA). It discussed the definition of a communication strategy for PIC/S, including the establishment of contact points for specific questions, and the issuance of a questionnaire on the PIC/S list of planned foreign inspections.

Foreign Inspections / Multiple Inspections

128. The list of foreign inspections planned in 2014 was updated twice in the course of the year. The list includes 1,120 planned foreign inspections by 18 Inspectorates including EDQM and UNICEF.

129. The Committee discussed how to address the recurrent complaints from industry on multiple inspections taking also in consideration the establishment of ICMRA with the specific WG on GMP inspections and the mandate to look at means to address multiple inspections. Multiple inspections were often caused by companies themselves (e.g. non-compliance). A proposal was made to collect evidence that multiple inspections are not caused by PIC/S PA.

Rapid Alert

130. The SC COM postponed the discussion on a proposal for a revision of the PIC/S SOP on Rapid Alert to align it with the recently revised EU RA.

131. The Committee agreed to share PIC/S RA with ASEAN Regulatory Authorities, provided that they did not get PIC/S RA through the intermediary of WHO. A letter was sent by the PIC/S Secretariat to the ASEAN Secretariat on this issue.

PIC/S Web Site

132. The Committee agreed to upgrade the PIC/S website (<u>www.picscheme.org</u>) in order to include new tools such as a Content Management System, a Data Management System as well as several modules (e.g. for surveys, newsletter, etc.). These new tools should help reducing the workload of the Secretariat. The upgraded website will also contain a substantial sub-site on the Academy (PIA).

Other issues

List of GM(D)P Inspectors

133. The list of GM(D)P Inspectors, employed by PIC/S PA and Partner Organisations, was updated.

Communications from Participating Authorities

134. A number of PA took advantage of the two annual meetings to inform the Committee on important changes or projects concerning their Agencies / Inspectorates.

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From the Pharmaceutical Inspection Convention to the Pharmaceutical Inspection Co-operation Scheme

The Convention for the Mutual Recognition of Inspections in respect of the Manufacture of Pharmaceutical Products (Pharmaceutical Inspection Convention) entered into force in 1971.

The Convention applies to inspection of the manufacture of medicinal and related products intended for human use, which are subject to control under health legislation. It provides that the Contracting States will exchange, on the basis of inspections, such information as is necessary for the health authorities in an importing Contracting State to be able to recognise inspections carried out in the Contracting State of the manufacturer.

In 2000 the Convention was operating between eighteen countries, namely, Australia, Austria, Belgium, Denmark, Finland, France, Germany, Hungary, Iceland, Ireland, Italy, Liechtenstein, Norway, Portugal, Romania, Sweden, Switzerland and the United Kingdom.

The Convention's Contracting States realised in the early 1990s that because of an incompatibility between the Convention and European law, it was not possible for new countries to be admitted as Members of PIC. Australia was the last country which was able to become a Member of the Convention in January 1993.

Consequently, a new arrangement called "Pharmaceutical Inspection Co-operation Scheme" (or PIC Scheme) was established on 2 November 1995. This is an arrangement between the inspectorates of the present Contracting States to the Convention but also open to the participation of the inspectorates of other countries.

The Pharmaceutical Inspection Convention and the Pharmaceutical Inspection Co-operation Scheme are run concurrently by one joint Committee and one Secretariat. The common logo for both is PIC/S.

LIST OF PIC/S PARTICIPATING AUTHORITIES (as of 31 December 2014)

	PARTICIPATING AUTHORITY	ACRONYM
Argentina	Instituto Nacional de Medicamentos (National Institute of Drugs)	INAME
Australia	Therapeutic Goods Administration	TGA
Austria	Austrian Agency for Health and Food Safety	AGES
Belgium	Agence Fédérale des Médicaments et des Produits de Santé (Federal Agency for Medicines and Health Products)	AFMPS
Canada	Health Products and Food Branch Inspectorate	HPFBI
Chinese Taipei	Taiwan Food and Drug Administration	TFDA
Cyprus	Pharmaceutical Services	CyPHS
Czech Republic ¹	Státní Ústav pro Kontrolu Léčiv (State Institute for Drug Control)	SÚKL
	Ústav pro Státní Kontrolu Veterinárních Biopreparátů a Léčiv (Czech Institute for State Control of Veterinary Biologicals and Medicines)	ISCVBM
Denmark	Danish Health and Medicines Authority	DHMA
Estonia	State Agency of Medicines	SAM
Finland	Finnish Medicines Agency	FIMEA
France ²	Agence nationale de sécurité du médicament et des produits de santé (French National Drug and Health Products Safety Agency)	ANSM
	Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail (French Agency for Food, Environmental & Occupational Health Safety)	ANSES

(in the alphabetical order of the country in which they are located)

¹ SÚKL and ÚSKVBL count as two distinct Participating Authorities.

² ANSM and ANSES count as two distinct Participating Authorities.

Germany ³	Bundesministerium für Gesundheit (Federal Ministry of Health)	BMG
	Zentralstelle der Länder für Gesundheitsschutz bei Arzneimitteln und Medizinprodukten (Central Authority of the Laender for Health Protection regarding Medicinal Products and Medical Devices)	ZLG
Greece	Εθνικός Οργανισμός Φαρμάκων (National Organization for Medicines)	EOF
Hungary	National Institute for Quality- and Organizational Development in Healthcare and Medicines National Institute of Pharmacy	NIP- GYEMSZI
Iceland	The Icelandic Medicines Agency	IMA
Indonesia	National Agency for Drug and Food Control	NADFC
Ireland	Health Products Regulatory Authority ⁴	HPRA
Israel	Institute for the Standardization and Control of Pharmaceuticals	ISCP
Italy	Agenzia Italiana del Farmaco	AIFA
Japan ⁵	Ministry of Health, Labour and Welfare	MHLW
	Pharmaceuticals and Medical Devices Agency	PMDA
	Japanese Prefectures	-
Korea (Republic of)	Ministry of Food and Drug Safety	MFDS
Latvia	Zāļu Valsts Aģentūra (State Agency of Medicines)	ZVA
Liechtenstein	Amt für Gesundheit (<i>Office of Healthcare</i>)	AG
Lithuania	State Medicines Control Agency	SMCA
Malaysia	National Pharmaceutical Control Bureau	NPCB
Malta	Medicines Authority Malta	MAM
Netherlands	Inspectie voor de Gezondheidszorg (Inspectorate of Health Care)	IGZ
New Zealand	Medicines and Medical Devices Safety Authority	Medsafe
Norway	Norwegian Medicines Agency	NOMA
Poland	Main Pharmaceutical Inspectorate	MPI

³ BMG and ZLG count as one Participating Authority.

⁴ The Irish Medicines Board (IMB) changed its name to "Health Products Regulatory Authority" (HPRA) on 1st July 2014.

⁵ MHLW, PMDA and the Japanese Prefectures count as one Participating Authority.

Portugal	Autoridade Nacional do Medicamento e Produtos	INFARMED
Tortugar	de Saúde IP (National Authority of Medicines and Health Products IP)	IP
Romania	National Agency for Medicines and Medical Devices	NAMMD
Singapore	Health Sciences Authority	HSA
Slovak Republic	State Institute for Drug Control	SIDC
Slovenia	Agency for Medicinal Products and Medical Devices	JAZMP
South Africa	Medicines Control Council	MCC
Spain	Agencia Española del Medicamento y Productos Sanitarios	AEMPS
	(Spanish Agency of Drugs and Health Products)	
Sweden	Medical Products Agency	MPA
Switzerland	Swiss Agency for Therapeutic Products	Swissmedic
Ukraine	State Administration of Ukraine on Medicinal Products	SAUMP
United Kingdom ⁶	Medicines and Healthcare Products Regulatory Agency	MHRA
	Veterinary Medicines Directorate	VMD
United States of America	United States Food and Drug Administration	US FDA

⁶ MHRA and VMD count as two distinct Participating Authorities.