2020 Annual Report

PHARMACEUTICAL INSPECTION CONVENTION

PHARMACEUTICAL INSPECTION CO-OPERATION SCHEME

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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PS/W 10/2021
16 August 2021

2020 Annual Report

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 a non-binding 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 2020, PIC/S comprised 53 Participating Authorities (PAs) from all continents. For the list of PIC/S PAs, see Annex 2.

PIC/S' mission is "to lead the international development, implementation and maintenance of harmonised GMP standards and quality systems of inspectorates in the field of medicinal products". This will be achieved by harmonising inspection procedures worldwide, by developing common standards in the field of GMP, by providing training opportunities to inspectors and by facilitating co-operation and networking between competent authorities, regional and international organisations, thus increasing mutual confidence.

A Committee of the PA representatives (the 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 2020.

Table of Contents

1. New PIC/S Chairperson 4
2. Impact of COVID-19 on PIC/S 4
3. PIC/S' expansion continues 5
4. Transition to virtual training events 6
5. Co-operation with ICH 7
6. Revision of the PIC/S GMP Guide and GPG for Blood Establishments 7
7. The PIC/S Inspectorates' Academy (PIA) continues to develop 7
8. PIC/S strategic plan (2022-2026) 8
9. Changes in the Executive Bureau 8
10. PIC/S Sub-Committee Structure 9
11. COMPLIANCE 10
12. Evaluation and Re-evaluation Procedures 11

    Working Group on the Interpretation of the Audit Checklist 11

    Working Group on the Revision of the Accession Guidelines 11
13. Membership Applications 11

    Armenia / SCDMTE 12

    Bulgaria / BDA 12

    Brazil / ANVISA 12

    Russian Federation / Minpromtorg, Roszdravnadzor, FSI "SID & GP" and FSBI "SCEMD" 12

    Saudi Arabia / SFDA 13
14. Pre-Accession Applications 13

    Azerbaijan / AEC 13

    Bangladesh / DGDA 13

    Jordan / JFDA 13

    Pakistan / DRAP 14
15. Reassessment of Participating Authorities 14

    Reassessment of Canada / ROEB 14

    Reassessment of Indonesia / NADFC 14

    Reassessment of New Zealand / Medsafe 15

    Reassessment of South Africa / SAHPRA 15

    Reassessment of Switzerland / Swissmedic 15

    Corrective Action / Update by recently acceded PAs or PAs under Reassessment 15

16. Non-Members 15
17. GMDP 16
18. Working Groups under the SCH 17
1. Working Group on Annex 1 17
2. Working Group on the revision of Annex 2 18
3. Working Group on Data Integrity 18
4. Working Group on Harmonisation of the Classification of Deficiencies 19
5. Working Group on Controlling Cross-Contamination in Shared Facilities (CCCISF) 19
6. Working Group on the Revision of PIC/S Guidance Documents for Blood 20
7. Working Group on the revision of PI 006 21
8. Working Group on the Aide Memoire on Tissues and Cellular Therapy Products Inspections 21
19. Revision of the PIC/S and EU GMP Guides and Annexes 21
Chapter 1 (Pharmaceutical Quality System) of PIC/S-EU GMP Guide 21
Chapter 4 (Documentation) and Annex 11 (Computerised Systems) of PIC/S-EU GMP Guide 21
Annexes 4 & 5 (Veterinary Medicinal Products) 22
Annex 13 (Investigational Medicinal Products) of PIC/S-EU GMP Guide 22
Annex 16 (Certification by an Authorised Person & Batch Release) of PIC/S-EU GMP Guide 22
Annex 21 (GMP Obligations for Importation to the EU) of EU GMP Guide: 22
20. Guidance Documents and Procedures 22
Update of Aide Memoires 23
Aide-Memoire on the Inspection of Pharmaceutical Quality Control Laboratories 23
Guide to Good Practices for the Preparation of Medicinal Products in Healthcare Establishments 23
Aide-Memoire on the Inspection of APIs 23
21. PIC/S Library 23
22. TRAINING 24
23. Annual Training Seminar 25
2020 Seminar 25
Past and Future Seminars 26
24. Joint Visits Programme / Coached Inspection Programme 27
25. PIC/S New Inspector Training Course 28
26. PIC/S Inspectorates' Academy (PIA) 28
27. ICH Q12 Training Material 30
28. Co-operation with other Agencies & Organisations 30

29. EXPERT CIRCLES 31
Expert Circle on API 31
Expert Circle on Controlling Cross Contamination in Shared Facilities 32
Expert Circle on GDP 32
Expert Circle on Human Blood, Tissues, Cells & ATMPS 32
Expert Circle on QRM 32
Working Group on GCP / GVP 33
Working Group on Medicinal Products for Veterinary Use (VMP) 34
Working Group on Computerised Systems 35
30. STRATEGIC DEVELOPMENT & CO-OPERATION 35
31. Working Groups operating under the SCSD 36
1. Unique Facility Identifiers (UFI) 36
2. Travel Safety 36
3. Informants 36
4. Inspection Reliance 37
32. PIC/S Pilot on Compliance Management 38
33. Co-operation with Associated Partners and other Organisations 38
Associated Partners (EDQM, EMA, OIE, UNICEF and WHO) 38
Other organisations 38
ASEAN 38
Heads of EEA Medicines' Agencies 38
ICMRA 39
ISPE 39
OECD 39
PDA 39
34. BUDGET, RISK & AUDIT 39
35. 2019 Accounts 40
36. 2020 Accounts 41
37. 2021 Budget 41
38. Budget Plans 41
39. COMMUNICATION 41
40. Co-operation with ICH 42
41. Foreign Inspections 43
42. Communications from / to Members 43
43. Other SC COM issues 43
44. PIC/S Website 44

ANNUAL REPORT 2020

1. New PIC/S Chairperson

On 1 January 2020, Ms Anne Hayes from Ireland's Health Products Regulatory Authority (HPRA) became the twenty-fourth Chairperson of PIC/S for the period 2020-21. She is the second PIC/S Chairperson from Ireland and the fifth woman to be elected to this position. She succeeds to Mr Boon Meow Hoe (Singapore / HSA).

Ms Hayes was the Deputy Chairperson of PIC/S in 2018-19. She has been an active member of the PIC/S Committee since 2005 and served as a PIC/S Executive Bureau member since 2013, in particular as Chair of the Sub-Committee on Compliance, which is one of the largest PIC/S Sub-Committees.

Photo: Ms Anne Hayes, PIC/S Chairperson

2. Impact of COVID-19 on PIC/S

As any other organisation, PIC/S was impacted by the outbreak of the COVID-19 pandemic. The Committee meeting, initially planned in Geneva (Switzerland) on 21-22 April 2020, had to be cancelled. No face-to-face Committee meeting took place during the year – a first in PIC/S' 50-year long history. However, since it normally meets twice per year, the Committee has a long tradition of taking decisions in-between meetings, by written procedure.

This practice proved to be very useful during the pandemic and all important decisions, in particular on financial and organisational matters, were successfully adopted by e-mail consultation. This was notably the case for the activity report of PIC/S (the Annual Report), the PIC/S accounts, the PIC/S budget, by-elections for Sub-Committee positions, etc. In addition, the PIC/S Committee, based on a proposal by the Executive Bureau, was able to agree on a PIC/S policy on the organisation of events in 2021 as well as a Work Plan for 2021.

Face-to-face training as well as other events had to be cancelled, rescheduled or held virtually. This was notably the case of the following:

- The 2020 PIC/S annual seminar, initially scheduled in Bangkok (Thailand) in November 2020, was postponed to 2023 and replaced with a virtual seminar, organised by Finland / FIMEA.

- The 50th Anniversary of PIC/S and the 2021 PIC/S annual seminar, scheduled in June 2021 in Dublin (Ireland), were postponed to 2022;

- The 2022 PIC/S annual seminar, to be organised in the Republic of Korea, was rescheduled to be held virtually by MFDS in 2021.

- Executive Bureau meetings were held virtually on 17 and 25 June 2020.

- All Sub-Committee and Working Group meetings were held by videoconference.

During the pandemic, PIC/S actively promoted inspection reliance by encouraging Participating Authorities (PAs) to rely on each other's GMP information. In order to promote improved inspection reliance among PAs, the Committee established a Working Group on Inspection Reliance.

The pandemic impacted on the inspection scheduling of all PAs. To help support PAs in the transition between stages of the pandemic, the Working Group on inspectors' travel safety drafted a guidance on "COVID-19 risk assessment for routine on-site inspections" (PI 055-1).

3. PIC/S' expansion continues

PIC/S' membership continued to expand in 2020.

Ministero della Salute

Italy's Directorate General for Animal Health and Veterinary Medicinal Products (DGSAF) joined PIC/S as the 53rd Participating Authority (PA) on 1 January 2020. Italy / DGSAF applied for PIC/S membership on 26 August 2016 and an on-site assessment visit took place on 14-18 January 2019. DGSAF is the 4th agency, exclusively competent for veterinary medicinal products, to join PIC/S.

ANVISA
Agência Nacional de Vigilância Sanitária

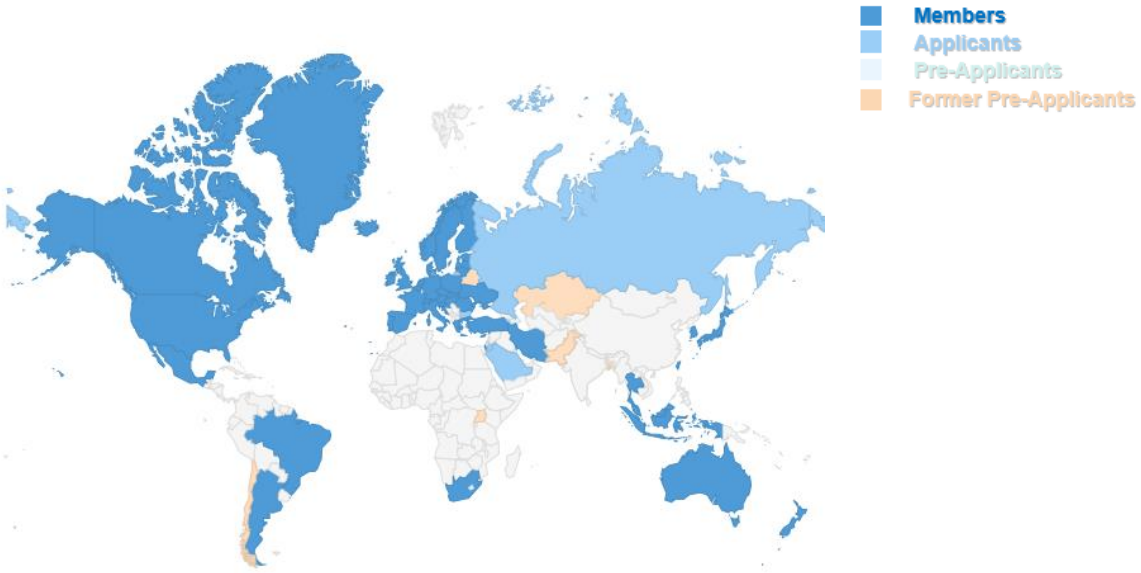
The assessment process of Brazil's Agência Nacional de Vigilância Sanitária (ANVISA) was successfully completed in 2020. ANVISA was invited to accede to the PIC Scheme on 1 January 2021 to become PIC/S' 54th PA. Brazil / ANVISA lodged a partial membership application in 2010, which was completed in 2014. Following a major reorganisation, its membership application was updated in 2019. The on-site assessment visit took place on 9-21 October 2019 and the report successfully endorsed by the PIC/S Committee in 2020. ANVISA is Latin America's 3rd Agency to join PIC/S while Brazil is South America's largest market for medicinal products.

The Analytical Expertise Center (AEC) of the Ministry of Health of Azerbaijan applied for PIC/S pre-accession on 18 August 2020 while the Competent Authorities of the Russian Federation submitted a membership application on 22 December 2020. The Russian Competent Authorities are:

- Ministry of Industry and Trade of the Russian Federation (Minpromtorg Russia);
- Federal Service for Surveillance in Healthcare (Roszdravnadzor), including Federal State Budgetary Institution "Information and Methodological Center for Expertise, Accounting and Analysis of Circulation of Medical Products" (FGBU "IMCEUAOSMP" of Roszdravnadzor);

- Federal State Institution “State Institute of Drugs and Good Practices” (FSI “SID & GP”);
- Federal State Budgetary Institution "Scientific Center for Examination of Medical Devices" of the Ministry of Health of the Russian Federation (FSBI "SCEMD”).

The continuous expansion of PIC/S (see map below) shows that the organisation is viewed as key by more and more Medicines Regulatory Authorities worldwide.



4. Transition to virtual training events

As an alternative to in-person training events, PIC/S transitioned to host all events in 2020 as virtual training events. These were attended by a record number of inspectors and proved to be a great success. This was made possible with the initiative of two Agencies which stepped forward to showcase virtual approach after all PIC/S face-to-face events were cancelled in 2020.

Finland / FIMEA initially agreed to organise a seminar in Finland in 2022. Following the cancellation of the 2020 seminar in Bangkok, the Director General of Finland / FIMEA, Ms Eija Pelkonen, proposed to the SCT Chairman, Jacques Morénas (France / ANSM), to organise a virtual seminar on the topic of “Distant Assessment of GMP Compliance”. Within a record time, FIMEA managed to host a seminar, which was attended by a record number of participants. A total of 378 participants from 48 jurisdictions attended this first-ever virtual seminar on 8-10 December 2020. The number of participants is all the more worth mentioning as the decision to organise the seminar was taken in May 2020 only, leaving FIMEA less than 6 months to prepare the event.

Turkey / TMMDA initially agreed to host a face-to-face training event for the Expert Circle on Quality Risk Management (QRM) in Istanbul in 2020. Following discussions with the Chairman of the Expert Circle, Mr Kevin O’Donnell (Ireland / HPRA), and the TMMDA representative in PIC/S, Ms Gülşen Yilmaz, it was agreed to replace the face-to-face event with a 1-day webinar. A total of 205 delegates from 53 jurisdictions and 3 partner organisations attended this first-ever virtual Expert Circle meeting, which was another great success.

5. Co-operation with ICH

Following a proposal by the ICH Management Committee (MC) for more routine engagement between PIC/S and ICH, a pilot was launched on 1 May 2020 covering co-operation in ICH Q9 (Quality Risk Management) and Q12 (Pharmaceutical Product Lifecycle Management).

To this effect, the Committee established a PIC/S Working Group on Training Material for ICH Q12 under the chairmanship of Jacques Morénas (France / ANSM), which prepared training material to be presented to PIC/S inspectors at a webinar in 2021. The webinar and the related training material will be financed thanks to a grant by ICH.

6. Revision of the PIC/S GMP Guide and GPG for Blood Establishments

PIC/S continued to contribute to expert discussions and to consult its stakeholders on contemporary GMP issues such as the manufacture of sterile products (Annex 1 of PIC/S GMP Guide), the manufacture of biological medicinal substances and products for human use (Annex 2 of PIC/S GMP Guide), and Good Practice Guidelines (GPG) for Blood Establishments and Hospital Blood Banks (PE 005).

In 2020, a revised draft of Annex 1 (manufacture of sterile products) was advanced for a second round of consultation in partnership with the European Medicines Agency (EMA) under a joint PIC/S-EMA Working Group in which the World Health Organisation (WHO) is also participating. This consultation resulted in about 2000 comments.

The Working Group on the revision of Annex 2 of the PIC/S GMP Guide issued a revised draft Annex 2A for the Manufacture of ATMP for Human Use and a revised draft Annex 2B for the Manufacture of Biological Medicinal Substances and Products for Human Use, based on comments received during the public consultation. The revised draft Annex 2A and 2B was submitted to Members in 2020 to start the final step of the PIC/S adoption process.

The Working Group on the revision of blood guidance documents completed the revision of both “PE 005: “PIC/S Good Practice Guidelines for Blood Establishments and Hospital Blood Banks” and “PI 008: PIC/S Aide Memoire to Inspections of Blood Establishments and Plasma Warehouses”. These documents are expected to enter into force in 2021.

7. The PIC/S Inspectorates’ Academy (PIA) continues to develop

The development of the PIC/S Inspectorates’ Academy (PIA) was further advanced in 2020. PIA is a PIC/S training initiative to set up a web-based educational centre in order to provide harmonised and standardised GMP training to inspectors as well as to set up a standardised qualification process of inspectors.

Thanks to a generous grant by Chinese Taipei / TFDA, a Learning Management System (LMS) was successfully developed. The LMS will be the backbone for the management

of PIA's training tools and content. The next step will consist in developing concrete training modules, starting with a pilot module on Quality Risk Management (QRM).

8. PIC/S strategic plan (2022-2026)

The Executive Bureau established a Working Group, which was mandated to develop the next PIC/S strategic plan for 2022-2026. The Working Group has developed a project plan with 4 consecutive phases: internal analysis, external analysis, strategic analysis and development of the plan (to be presented at the PIC/S 50th anniversary).

9. Changes in the Executive Bureau

At its meeting in Toyama, the PIC/S Committee elected Ms Anne Hayes (Ireland / HPRA) as Chairperson for the period 2020-2021. Ms Hayes will be able to rely on the Executive Bureau (EB) whose Members were also elected in Toyama for the same period.

The full EB consists of:

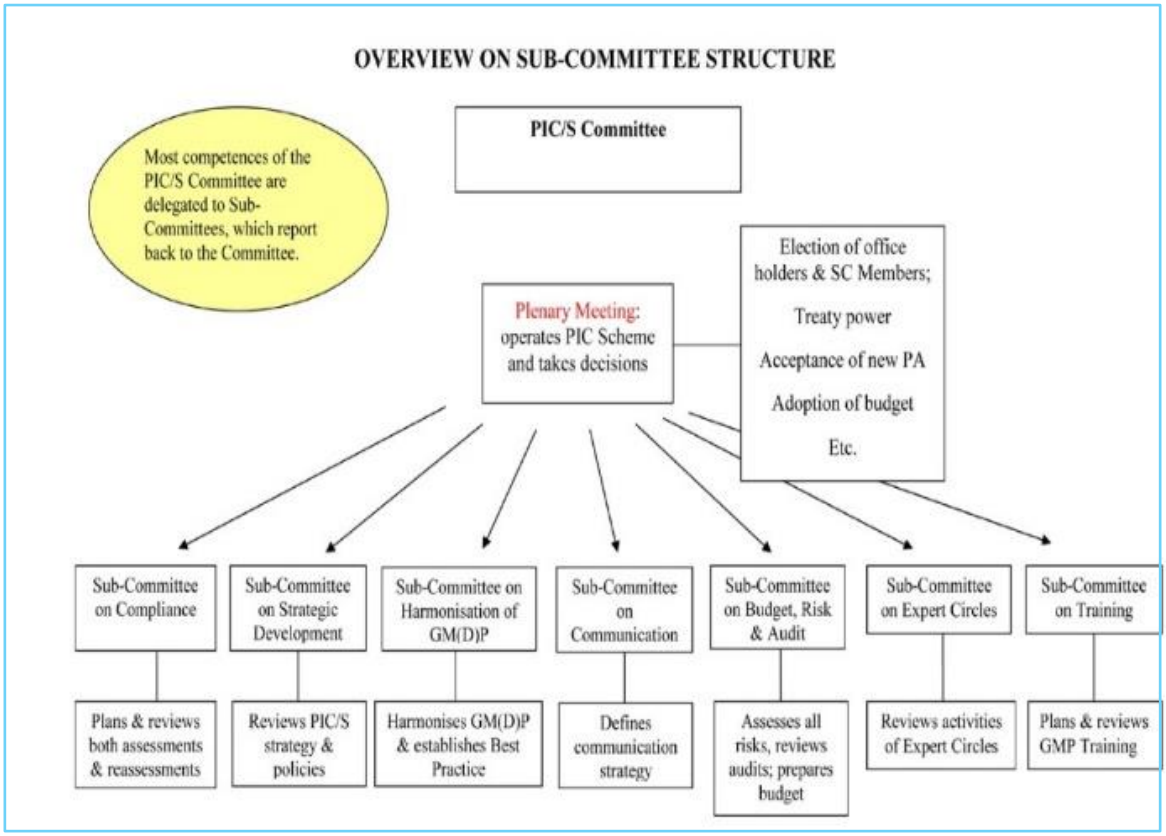
- Ms Anne Hayes (Ireland / HPRA), PIC/S Chairperson;
- Mr Paul Gustafson (Canada / ROEB), PIC/S Deputy Chairman and Chair of the Sub-Committee on GM(D)P Harmonisation (SCH);
- Mr Boon Meow Hoe (Singapore / HSA), immediate past PIC/S Chairman;
- Mr Jacques Morénas (France / ANSM), Chair of the Sub-Committee on Training (SCT);
- Dr Andreas Krassnigg (Austria / AGES), Chair of the Sub-Committee on Expert Circles (SCEC);
- Mr Ger Jan van Ringen (Netherlands / IGJ), Chair of the Sub-Committee on Budget, Risk and Audit (SCB);
- Ms Susan Laska (US FDA), Chair of the Sub-Committee on Strategic Development (SCSD).
- Ms Stephanie Anctil (Canada / ROEB), Chair of the Sub-Committee on Compliance (SCC); and
- Mr David Churchward (United Kingdom / MHRA), Chair of the Sub-Committee on Communication (SC COM).

Ms Anne Hayes (Ireland / HPRA), PIC/S Chairperson, with
Mr Boon Meow Hoe (Singapore / HSA), immediate past PIC/S Chairman (left photo), and
Mr Paul Gustafson (Canada / ROEB), PIC/S Deputy Chairman (right photo).

10. PIC/S Sub-Committee Structure

PIC/S has established seven Sub-Committees (SC) in the following fields: Training (SCT); Expert Circles (SCEC); Strategic Development (SCSD); Compliance (SCC); GM(D)P Harmonisation (SCH); Budget, Risk and Audit (SCB) and Communication (SC COM). See also Organisational Chart below.

The activities of the PIC/S Committee and the seven Sub-Committees are summarised in this Annual Report.



11. COMPLIANCE

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 the PIC Scheme. Being equivalent is not only required for accession but all the time and duly verified during reassessments. This is why the compliance to the PIC Scheme is one of PIC/S' most important and critical activities.

This task has been entrusted to the Sub-Committee on Compliance (SCC) under the chairmanship of Stephanie Anctil (Canada / ROEB), who took over the SCC on 1 January 2020 following her election in Toyama. 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

The SCC held four virtual meetings in 2020: on 19 March, 30 June, 15 October and 15 December. It discussed membership applications, pre-accession applications, assessment and reassessment procedures as well as contacts with non-Members, as detailed below.

Travel restrictions related to the COVID-19 pandemic impacted on the assessment and reassessment processes. Planned on-site visits all needed to be rescheduled.

12. Evaluation and Re-evaluation Procedures

Following the entry into force of the PIC/S Guidelines for the Pre-Accession Procedure on 1 January 2020, the Working Group on Pre-Accession Guidelines was disbanded. As a result, there are only two Working Groups left under the auspices of the SCC. These are:

- The Working Group on the Interpretation of the Audit Checklist
- The Working Group on the Revision of the Accession Guidelines

Working Group on the Interpretation of the Audit Checklist

The Working Group on the interpretation of the Audit Checklist is run in co-operation with the EMA Compliance Group on the Joint Audit Programme (JAP). The Working Group, led by Louise Kane (Canada / ROEB), has developed an interpretation guideline on the 78 indicators contained in the PIC/S-JAP Audit Checklist, which is based on the Evaluation Guide for GMP Regulatory Compliance Programme of Health Canada. A first draft of the interpretation guideline was circulated to Members for comments on 15 October 2019 with a deadline until 30 November 2019. The finalised interpretation guide was successfully adopted by written procedure on 31 August 2020 and entered into force on 1 September 2020.

Working Group on the Revision of the Accession Guidelines

The Working Group on the revision of the Accession Guidelines and related documents is led by Jacques Morénas (France / ANSM). It is revising the PIC/S Guidelines for Accession and a number of other related procedures such as the questionnaire for assessment, the report template, and other documents used either for the assessment of Applicants or for the reassessment of Members under the PIC/S Joint Reassessment Programme (JRP). In 2020, the Working Group was able to make significant process on a number of these documents, which will be submitted for comments in 2021.

13. Membership Applications

In the course of 2020, PIC/S continued the assessment of the following five membership applications (in alphabetical order):

Armenia / SCDMTE

Having successfully completed the Corrective and Preventive Actions (CAPA) resulting from the PIC/S pre-accession gap analysis, conducted back in 2013, Armenia's Scientific Center of Drug and Medical Technologies Expertise (SCDMTE) applied for PIC/S membership on 8 September 2017. The application was formally completed on 13 April 2018. However, due to a change in Government in Armenia and the adoption of new regulations in 2018-19, the Rapporteur, Michel Keller (formerly Switzerland / Swissmedic), and the Co-Rapporteur, Mark Cilia (Malta / MAM), asked Armenia / SCDMTE to update the application and submit the new regulations before completing the paper evaluation. As a result of these and other delays related to the pandemic, the on-site assessment, initially planned in second half of 2020, has been postponed.

Bulgaria / BDA

The Bulgarian Drug Agency (BDA) submitted a complete membership application on 27 August 2018. As BDA went through an audit under the EMA Joint Audit Programme (JAP) in 2017 and the report was shared with PIC/S, the application process will be abridged and consist of a partial assessment taking into account the EMA JAP audit. The PIC/S audit will also be combined with an MRA assessment by Health Canada.

The appointed Rapporteur, Jacques Morénas (France / ANSM), and the Co-Rapporteur, Ana Rita Martins (Portugal / INFARMED I.P.), have reviewed the JAP report and agreed with Health Canada on the need to observe two inspections: one by Canada on sterile manufacturing and one by PIC/S on non-sterile manufacturing. Due to the COVID-19 pandemic, the planned on-site assessment visit, which was scheduled to take place in March 2020, has been postponed. BDA has submitted updated documents and the Team is in process of reviewing them.

Brazil / ANVISA

Brazil's Agência Nacional de Vigilância Sanitária (ANVISA) lodged a partial membership application in 2010, which was completed in October 2014. In April 2018, the Committee granted a one-year stop-clock in order for ANVISA to update the membership application following a major reorganisation of its inspection system. The updated membership application was submitted on 17 April 2019. The on-site assessment visit took place on 9-21 October 2019.

The visit report was finalised by the Acting Rapporteur, Ana Rita Martins (Portugal / INFARMED I.P.), in the course of 2020. It was first endorsed by the SCC on 15 October 2020 and then by the Committee on 27 November 2020 (both by written procedure). Brazil / ANVISA was invited to join PIC/S on 1 January 2021 as PIC/S' 54th PA.

Russian Federation / Minpromtorg, Roszdravnadzor, FSI "SID & GP" and FSBI "SCEMD"

Following the closure of the pre-accession process in 2019, the Competent Authorities of the Russian Federation submitted a complete membership application to PIC/S on 22 December 2020. The Russian Competent Authorities are:

- Ministry of Industry and Trade of the Russian Federation (Minpromtorg Russia);
- Federal Service for Surveillance in Healthcare (Roszdravnadzor), including Federal State Budgetary Institution “Information and Methodological Center for Expertise, Accounting and Analysis of Circulation of Medical Products” (FGBU “IMCEUAOSMP” of Roszdravnadzor);
- Federal State Institution “State Institute of Drugs and Good Practices” (FSI “SID & GP”);
- Federal State Budgetary Institution "Scientific Center for Examination of Medical Devices" of the Ministry of Health of the Russian Federation (FSBI "SCEMD”).

Saudi Arabia / SFDA

Following the closure of its pre-accession application on 10 April 2019, the Saudi Food & Drug Authority (SFDA) applied for PIC/S membership on 17 February 2020. Due to the COVID-19 pandemic, the appointment of an Assessment Team suffered some delays but is expected to be finalised in early 2021.

14. Pre-Accession Applications

In the course of 2020, the following four pre-accession applications were under review:

Azerbaijan / AEC

The Analytical Expertise Center (AEC) of the Ministry of Health of Azerbaijan applied for PIC/S pre-accession on 18 August 2020. The nomination of the Rapporteur has been launched.

Bangladesh / DGDA

Bangladesh’s Directorate General of Drug Administration (DGDA) applied for pre-accession on 26 February 2019. Due to the pandemic in 2020, there was no opportunity for the Rapporteur, Henning Willads Petersen (Denmark / DKMA), to meet face-to-face with DGDA to explain PIC/S assessment requirements. Despite efforts by the Rapporteur to engage with DGDA by using alternative communication channels, little progress was achieved in the pre-accession process. DGDA also failed to pay the 2020 annual fee that Pre-Applicants must pay to PIC/S during the entire process.

Jordan / JFDA

The Jordan Food and Drug Administration (JFDA) submitted a complete pre-accession application on 9 August 2018. In 2020, the Rapporteur, Belinna Binti Abu Bakar (Malaysia / NPRA), submitted her final report, which was endorsed by the SCC and then by the Committee by written procedure, which was successfully completed on 11 December 2020. The pre-accession process of Jordan FDA was officially closed on 31 December 2020.

Pakistan / DRAP

The Drug Regulatory Authority of Pakistan (DRAP) submitted a pre-accession application on 18 September 2017. The Rapporteur, Petra Müllerová (Czech Republic / ISCVBM), assessed the pre-accession application during the period 2018-19 and submitted her gap-analysis report to DRAP and the SCC for review in the course of 2020.

15. Reassessment of Participating Authorities

In order to ensure that both new members and existing members of PIC/S fulfil the same requirements, high quality standards are maintained and GMP Inspectorates remain equivalent, a Joint Reassessment Programme (JRP) was introduced in 2000 under which existing PIC/S members are reassessed for equivalence on a regular basis. The JRP is run in parallel with the EU's Joint Audit Programme (JAP) and uses the same tools. JAP assessments and JRP reassessments are deemed equivalent. The JRP assessments and reassessments are sometimes combined with the MRA Maintenance program of Health Canada, which is following a similar approach, thus contributing to saving resources for regulators and reducing the burden for the audited party.

The reassessment process usually stretches over several years starting with a decision by the Committee to reassess a PA and finishing with the endorsement of the reassessment report.

In 2020, the Committee reviewed the following reassessment processes (in alphabetical order):

Reassessment of Canada / ROEB

The on-site reassessment visit took place on 7-11 October 2019. The Audit Team consisted of three Members: one Team Leader, Richard Andrews (UK / MHRA), and two auditors from Australia / TGA and Switzerland / Swissmedic. The reassessment report as well as the team's conclusions were reviewed by the SCC and then by the Committee in 2020. The reassessment was successfully completed by Canada / ROEB, which continues to be equivalent in line with the Scheme's requirements.

Reassessment of Indonesia / NADFC

The reassessment of Indonesia / NADFC was due to take place in 2020. In 2019, a call was made for the constitution of an Audit Team for the reassessment of Indonesia / NADFC. Due to the pandemic in 2020, the reassessment process was put on hold. The SCC proposed a 2-step approach, which was endorsed by the Committee in 2020. The approach consists of carrying out first a paper evaluation to be followed by an on-site visit.

Reassessment of New Zealand / Medsafe

In 2019, the Committee appointed the Audit Team, which consists of the Team Leader, Jacques Morénas (France / ANSM), in charge of the on-site assessment visit, and an auditor from Ireland / HPRA, who observed an inspection of an aseptic manufacturer in December 2019. Due to the pandemic, the on-site visit, planned in Q4 2020, had to be postponed. Based on a proposal by the Rapporteur, the SCC agreed replacing the on-site visit with a desktop assessment, as described in the JRP procedures, currently under revision.

Reassessment of South Africa / SAHPRA

The reassessment of South Africa / SAHPRA has been postponed twice at the request of SAHPRA: first, to Q4 2019 and then to June 2020. In 2020, the pandemic forced PIC/S to postpone the planned reassessment. The PIC/S Chairperson wrote to SAHPRA CEO and proposed to start the reassessment process remotely with those elements which can be reviewed remotely. This has been followed by contacts between SAPHRA and the Rapporteur, Jacques Morénas (France / ANSM). The reassessment process has not been formally initiated yet, subject to confirmation by SAPHRA of its availability in the context of COVID-19.

Reassessment of Switzerland / Swissmedic

The reassessment of Switzerland / Swissmedic took place on 15-19 October 2018. It was combined with an MRA re-assessment by Health Canada and co-ordinated with the EMA JAP audit of Liechtenstein / AG.

The reassessment report by the Rapporteur, Susan Laska (US FDA), was discussed by the SCC and the Committee in 2019 and its conclusions endorsed. Switzerland / Swissmedic continues to be equivalent in line with the Scheme's requirements. However, the report was returned to the Rapporteur for clarification on a few points. The revised report was endorsed by the SCC in 2020 and the reassessment successfully closed.

Corrective Action / Update by recently acceded PAs or PAs under Reassessment

The SCC continued to monitor corrective actions by recently acceded PIC/S PAs or PIC/S PAs under reassessment.

16. Non-Members

Close contacts were kept with a number of non-Members, in particular with China's National Medical Products Administration (NMPA). Discussions on addressing issues, identified by NMPA, in relation with a possible membership application, continued by e-mail and teleconference.

17. GMDP

The harmonisation of Good Manufacturing Practice (GMP) is at the very heart of PIC/S. More recently, good practices were also harmonised in other fields such as Good Distribution Practice (GDP) or Good Practices for Blood Establishments. The main reasons for adopting common standards are:

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

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.

The mandate of the Sub-Committee on the Harmonisation of GM(D)P (SCH), chaired by Paul Gustafson (Canada / ROEB), 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

In the course of 2020, the SCH held four virtual meetings: on 9 January, 11 June, 10 September and 17 December. During these meetings, it discussed various revisions to the PIC/S GMP Guide as well as new or revised guidance documents. The drafting (or revision) of all guidance documents normally follows the same, 3-step process:

- Step 1: PIC/S internal consultation of Members on a draft guidance, which has been prepared by a dedicated PIC/S Working Group, with the aim of reaching a consensus amongst all PIC/S PAs. In a few exceptional cases, the draft guidance can also be applied on a trial basis by PAs.

- Step 2: external public consultation of stakeholders, mainly industry and other associations located in the jurisdictions of PAs as well international professional or industry associations. The consultation may be limited in some cases, either in terms of stakeholders or scope. There is no public consultation for guidance documents, which are intended for inspectors only.

- Step 3: adoption by PIC/S of the guidance document, followed by its publication and entry into force.

The SCH also monitored and reviewed the work carried out by a number of Working Groups, operating under the SCH, as detailed below.

18. Working Groups under the SCH

Eight Working Groups are operating under the SCH.

1. Working Group on Annex 1

The PIC/S Working Group on Annex 1 (manufacture of sterile products) was established at the Rome meeting on 15-16 May 2014. At the Paris meeting on 20-21 October 2014 the WG was merged with the EMA IWG Drafting Group with a view to jointly revise Annex 1. The joint PIC/S-EMA Working Group includes representatives of the Competent Authorities of PIC/S and EEA as well as WHO. It was first led by Andrew Hopkins (UK / MHRA). Since 2019, the Working Group has been chaired by Abdelaali Sarakha (France / ANSM).

Following two written consultations of PIC/S PAs and EU/EEA Competent Authorities, the revision of Annex 1 was advanced to Step 2 in December 2017 for a joint public consultation. Over 6,300 comments were received during the 3-month consultation and then reviewed by the Working Group in 2018 and 2019. This resulted into a new draft of the revised Annex 1.

This revised draft was submitted to a second joint PIC/S-EMA-WHO public consultation from 3 February to 20 July 2020, which resulted in about 2,000 comments. A majority of the feedback relates to Chapter 8 (Production and Specific Technologies), Chapter 4 (Premises), and Chapter 9 (Viable and non-viable environmental & process monitoring). The Working Group has started with the review of the comments.

2. Working Group on the revision of Annex 2

Following the adoption by the European Commission of the EU Guidelines on GMP for Advanced Therapies Medicinal Products (ATMPs) and the revision of Annex 2 to the EU GMP Guide, the Committee decided to establish a Working Group on the revision of Annex 2 of the PIC/S GMP Guide (manufacture of biological medicinal substances and products for human use).

The Working Group was established in 2018 and consists of 18 experts from PAs as well as 2 Partner Organisations: EMA and WHO. It was first led by Francesco Cicirello (Australia / TGA). Since mid-May 2020, the Working Group has been chaired by Christina Meissner (Austria / AGES).

The Working Group has prepared two documents: (i) a new Annex 2A for the Manufacture of ATMP for Human Use based on the requirements of the EU Guidelines on ATMP, and (ii) an Annex 2B for the Manufacture of Biological Medicinal Substances and Products for Human Use based on the revised EU Annex 2 for biologics.

Both documents were advanced to Step 1 (consultation of PAs) on 25 March 2019 and then to Step 2 (public consultation) on 20 September 2019. The 3-month public consultation consisted in a targeted stakeholder consultation with the assistance of a number of professional and industry organisations, which agreed to collect comments from stakeholders on behalf of PIC/S. These organisations were:

- European Compliance Academy (ECA),
- International Federation of Pharmaceutical Manufacturers & Associations (IFPMA),
- International Society for Cell & Gene Therapy (ISCT),
- International Society for Pharmaceutical Engineering (ISPE),
- Parenteral Drug Association (PDA), and
- Society of Quality Assurance (SQA).

A total of 240 comments were received during this consultation and then reviewed by the Working Group. The revised draft of Annex 2A and 2B was submitted to PAs on 18 August 2020 with an opportunity to comment by 27 November 2020.

3. Working Group on Data Integrity

The PIC/S Working Group on Data Integrity was established in 2015 and is co-chaired by Matthew Davis (Australia / TGA) and David Churchward (UK / MHRA). It has developed a PIC/S data integrity guidance document to provide inspectors with the basic skills for performing data integrity inspections. The draft “PIC/S Good Practices for Data Management and Integrity in Regulated GMP/GDP Environments” (PI 041-1 (Draft 2)) was published on 10 August 2016 and implemented on a trial-basis for a period of 6

months. In parallel, PAs were invited to report back on the implementation of the guidance document.

The draft guidance was then revised based on Members' comments and submitted for public consultation for a period of three months on 30 November 2018 (PI 041-1 (Draft 3)). The consultation took the form of a "focused consultation" seeking comments from industry on specific questions. The following organisations agreed to compile the comments from their members:

- European Compliance Academy (ECA),
- International Federation of Pharmaceutical Manufacturers & Associations (IFPMA),
- International Society for Pharmaceutical Engineering (ISPE), and
- Parenteral Drug Association (PDA).

In parallel, PIC/S PAs were re-invited to apply the revised draft guidance on a trial basis. In 2019-20, the WG reviewed all comments received, whether from PAs or stakeholders. Adoption of the guidance will be realised in 2021.

The Working Group also developed an aide-memoire along with other tools to support data integrity inspections. These documents are accessible only to PIC/S inspectors.

4. Working Group on Harmonisation of the Classification of Deficiencies

The Working Group on Harmonisation of the Classification of Deficiencies, led by Jenny Hantzinikolas (Australia / TGA), has concluded its original mandate, which consisted in drafting a PIC/S Guidance on Classification of Deficiencies (PI 040-1). The latter was successfully adopted and entered into force on 1 January 2019.

In order to align the PIC/S SOP on Inspection Report Format (PI 013-3) with PI 040-1, the SCH has started a revision of PI 013-3. A first draft was advanced to Step 1 on 4 April 2019 with a deadline for comments until 31 May 2019. In 2020, the revision of the SOP was put on hold due to other priorities.

5. Working Group on Controlling Cross-Contamination in Shared Facilities (CCCISF)

The Working Group on Controlling Cross-Contamination in Shared Facilities has prepared an Aide Memoire, which aims at harmonising and standardising terminology used in relation with the control of cross-contamination in shared facilities while addressing questions which inspectors should ask themselves during inspections – in particular in relation with risk management. The Aide-Memoire on Cross-Contamination in Shared Facilities (PI 043-1) entered into force on 1 July 2018.

At its meeting in Toyama in November 2019, the Committee mandated a new Working Group on Controlling Cross-Contamination in Shared Facilities (CCCISF) to update PI 043-1. Members of the Working Group were tacitly appointed by written procedure in June 2020. The Working Group is chaired by Simone Pitts (US FDA)

In 2020, the Expert Circle on Controlling Cross-Contamination in Shared Facilities, which operates separately from the Working Group with the same name, reviewed the

comments received during Step 1 (internal consultation of PIC/S PA), which ended on 31 July 2019, of the following two documents:

- PI 052-1: Aide-memoire on the Inspection of Health Based Exposure Limit (HBEL) Assessments and Use in Quality Risk Management;

- PI 053-1: Questions and Answers on Implementation of Risk-based Prevention of Cross-contamination in Production and 'Guideline on Setting HBEL for Use in Risk Identification in the Manufacture of Different Medicinal Products in Shared Facilities'.

These documents were adopted by written procedure and entered into force on 1 June 2020.

6. Working Group on the Revision of PIC/S Guidance Documents for Blood

The Working Group on the Revision of PIC/S Guidance Documents for Blood is chaired by Christian Schärer (Switzerland / Swissmedic). It has been established in order to revise the PIC/S GMP Guide for Blood Establishments (PE 005-3) and the PIC/S Guide to Inspections of Source Plasma Establishment and Plasma Warehouses (PI 008-3) with a view to harmonise them with the EDQM-EC Good Practices Guidelines (GPG) for Blood Establishments.

The Working Group has worked first on a revision of PE 005, which was renamed "PIC/S Good Practice Guidelines for Blood Establishments and Hospital Blood Banks". A first draft was submitted to the Expert Circle on Human Blood, Tissue, Cells & ATMPs in Warsaw (Poland) on 23-25 October 2018. The draft was then reviewed by the SCH and advanced to Step 1 (PIC/S-internal consultation) on 11 March 2019 with a deadline for comments by 30 April 2019. A revised draft was advanced to Step 2 (consultation of national industry associations) with a deadline for comments until 17 April 2020.

The Working Group has then revised the PIC/S Guide to Inspections of Source Plasma Establishment and Plasma Warehouses (PI 008), which was converted into an Aide-Memoire ("PIC/S Aide Memoire to Inspections of Blood Establishments and Plasma Warehouses") and advanced for Step 1 (PIC/S-internal consultation) with a deadline for comments until 6 December 2019.

The mandate of the WG was amended in the course of 2019 in order to include a revision of the related Site Master Files (SMF). Work on these two documents will only start once PE 005 and PI 008 have been successfully revised.

In 2020, the Working Group completed the revision of both "PE 005: "PIC/S Good Practice Guidelines for Blood Establishments and Hospital Blood Banks" and "PI 008: PIC/S Aide Memoire to Inspections of Blood Establishments and Plasma Warehouses". All comments have been integrated and the documents prepared for Step 3 (adoption) with a publication in 2021.

7. Working Group on the revision of PI 006

A full revision of the PIC/S Recommendations on Validation Master Plan; Installation and Operational Qualification; Non-Sterile Process Validation; and Cleaning Validation (PI 006-3) has been initiated by a Working Group led by Norman Gray (UK / MHRA). The aim is to delete repetition with Annex 15 and provide an updated interpretation. Step 1 (consultation of PAs) was launched on 24 August 2020 and ended on 27 November 2020. As a next step, comments will be reviewed and integrated.

8. Working Group on the Aide Memoire on Tissues and Cellular Therapy Products Inspections

Following a call to Members in 2019, a Working Group on an Aide Memoire on Tissues and Cellular Therapy Products Inspections has been established with the aim of developing an Aide Memoire. Members were successfully appointed by written procedure on 14 May 2020. The Working Group is chaired by Alyce Maksoud (Australia / TGA).

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

One of the main duties of the SCH is to harmonise GM(D)P guidance documents with the EU, in particular the PIC/S GMP Guide and Annexes, and to transpose EU (proposed) revisions for PIC/S purpose. PIC/S experts are also involved in EMA Drafting Groups on the revision of Chapters and Annexes of the PIC/S-EU GMP Guide in line with the PIC/S-EMA Joint Consultation Procedure.

The following Chapters and Annexes of the PIC/S-EU GMP Guide are in the process of being drafted / revised:

Chapter 1 (Pharmaceutical Quality System) of PIC/S-EU GMP Guide

Due to relocation of EMA and the related Contingency Plan, the revision of Chapter 1 has been put on hold since 2019. PIC/S will be represented by an Expert in this Drafting Group.

Chapter 4 (Documentation) and Annex 11 (Computerised Systems) of PIC/S-EU GMP Guide

PIC/S is represented in the EMA IWG Drafting Group on the revision of Chapter 4 and Annex 11 by experts from Australia / TGA and Canada / ROEB. Due to the relocation of EMA, the work of this Drafting Group has also been put on hold since 2019.

Annexes 4 & 5 (Veterinary Medicinal Products)

The Working Group on Veterinary Medicinal Product (VMP) plans to initiate a revision of these two Annexes. This will be done jointly the EMA. It also plans to develop new veterinary specific guidance in co-operation with EMA for GMP for Veterinary ATMPs, GMP for Autogenous Veterinary Vaccines, GDP for API use as starting material for VMP, and GDP for VMP.

Annex 13 (Investigational Medicinal Products) of PIC/S-EU GMP Guide

The SCH has transposed a revision of EU Annex 13 (Investigational Medicinal Products) for PIC/S purposes. Step 1 (internal consultation of PIC/S PAs) was concluded on 10 February 2019. Step 2 (consultation of non-EEA PA of their national industry associations) ended on 15 November 2019. Step 3 will be initiated in 2021 to ensure that it can enter into force at the same time as EU Annex 13.

Annex 16 (Certification by an Authorised Person & Batch Release) of PIC/S-EU GMP Guide

The SCH has discussed a proposal to adapt EU Annex 16 for PIC/S purposes. As neither the PIC Scheme nor the PIC/S GMP Guide deal with import or import controls, the SCH has recommended that the implementation for import-related requirements, contained in Annex 16, be voluntary for non-EU/EEA PAs of PIC/S.

Step 1 (internal consultation of PIC/S PAs) of Annex 16 ended on 10 February 2019. Following this consultation, the Committee discussed whether imports should be completely excluded from Annex 16, as the scope of the GMP Guide is normally limited to manufactured medicinal products. It consulted PAs on this issue in the course of 2019. The consultation showed that a vast majority of respondents were in favour of retaining provisions on imports, which would be applied on a voluntary basis. As a result, Step 2 (public consultation of national stakeholders) will be launched in 2021.

Annex 21 (GMP Obligations for Importation to the EU) of EU GMP Guide:

PIC/S is represented by Switzerland / Swissmedic in this Drafting Group on Annex 21 of the EU GMP Guide. Following a review of the first draft, the SCH recommended to the PIC/S Committee to not transpose the new EU Annex 21 for PIC/S purposes. The European Commission launched a public consultation on EU Annex 21 in 2020 (20 March – 20 August). A formal decision will be taken by the Committee at its next meeting on the basis of the finalised EU Annex 21.

20. Guidance Documents and Procedures

All PIC/S guidance documents are available on the PIC/S website https://www.picscheme.org/en/publications. GMP guidance documents are periodically revised to comply with updated GMP requirements and technological progress. In 2020 a number of updates have been undertaken, as detailed below.

Update of Aide Memoires

As part of its accession process, Brazil / ANVISA translated a number of PIC/S Aide Memoires and updated the cross-references to the PIC/S GMP Guide, which was revised several times. The SCH reviewed and finalised the following Aide Memoires, which entered into force on 1 January 2021:

- PI 009-4 Aide Memoire on Utilities;
- PI 024-3 Aide Memoires on Biotech;
- PI 028-2 Aide Memoire on Packaging;
- PI 038-2 Aide Memoire on Assessment of QRM Implementation.

Aide-Memoire on the Inspection of Pharmaceutical Quality Control Laboratories

The revision of the PIC/S Aide-Memoire on the Inspection of Pharmaceutical Quality Control Laboratories (PI 023-2) was discussed by experts during the 2017 Seminar on Quality Control Laboratories Related in Taipei (Chinese Taipei). Related comments were reviewed by Chinese Taipei / TFDA in 2018. Work on the revision of this Aide Memoire was placed on hold in 2020 due to other priorities.

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

The SCH intends to revise PIC/S Guide to Good Practices for the Preparation of Medicinal Products in Healthcare Establishments (PE 010-4) in order to include an EMA / EU Parenteral Nutrition guidance as an appendix.

Aide-Memoire on the Inspection of APIs

The Expert Circle on APIs continues to work on the revision of the Aide-Memoire on the Inspection of APIs (PI 030-1).

21. PIC/S Library

The PIC/S library is a project to establish a list of all available documents related to GM(D)P inspection drafted by Members and Partner Organisations. A first compilation, based on information provided by 12 PAs, has been prepared and is available to PIC/S inspectors.

In conjunction with the PIC/S library, ECA and ISPE continued to share GMP-related guidance documents with PIC/S, which are made available to inspectors on the password-protected website. These guidance documents contain very useful technical information. Since 2020 all PDA Technical Reports as well as some other PDA relevant technical documents have also been made to available to PIC/S inspectors.

22. TRAINING

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 a core activity, essential in terms of PIC/S meeting its goals. PIC/S has also opened its training programme to inspectors active in other areas such as Good Practices for Human Blood, Tissues, Cells & ATMPs. Good Distribution Practice (GDP), Good Clinical Practices (GCP) and Good Pharmacovigilance Practices (GVP).

The Sub-Committee on Training (SCT) is the oldest Sub-Committee and was initially established as a Working Group under the PIC/S Committee. 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

3. 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

The Sub-Committee on Training (SCT) is chaired by Jacques Morénas (France / ANSM), and met four times in 2020: on 16 March, 10 June, 8 September and 17 November 2020.

During these virtual meetings (mainly videoconferences), the SCT discussed the development of the PIC/S Inspectorates' Academy (PIA) as well as the planning of training events in 2020, which had to be completely reviewed due to the COVID-19 pandemic. The following changes were made:

- The 2020 PIC/S annual seminar, scheduled to take place in Bangkok (Thailand) in November 2020, was postponed to 2023 and replaced with a virtual seminar, organised by Finland / FIMEA on 8-10 December 2020.

- The 2021 PIC/S annual seminar, scheduled in June 2021 in Dublin (Ireland), was postponed to May 2022;

- The 2022 PIC/S annual seminar, which was initially planned as a face-to-face event in the Republic of Korea, was rescheduled to be held virtually by MFDS in November 2021.

As a result of these changes and thanks to tremendous efforts by the organisers and the SCT, two virtual training events were successfully organised by PIC/S in 2020 (in chronological order):

Date	Virtual Place	Activity	Organised by
24 September 2020	Istanbul (Turkey)	Expert Circle on Quality Risk Management (QRM)	Turkey / TMMDA
8-10 December 2020	Helsinki (Finland)	PIC/S 2020 Seminar on Distant Assessment of GMP Compliance	Finland / FIMEA

23. Annual Training Seminar

PIC/S arranges an annual Training Seminar for inspectors, with each Seminar dealing with a specific topic and hosted by a different PIC/S PA. The SCT, jointly with the PIC/S Committee, reviews the organisation and outcome of annual seminars in line with the PIC/S Aide Memoire on the Organisation of Seminars.

2020 Seminar

Finland / FIMEA proudly hosted the 2020 Seminar on “Distant Assessment of GMP Compliance", which was held virtually on 8-10 December 2020. The virtual seminar was attended by 378 participants from 48 jurisdictions. All continents were represented.

This was the second time that Finland hosted a PIC/S Seminar after the one held in Naantali in 1997. The 2020 seminar was officially opened by FIMEA Director General, Ms Eija Pelkonen. It focused on the applicability of distant assessment as a method to evaluate and verify the GMP compliance where on-site inspections are restricted e.g. due to travel or sanitary restrictions. Particular attention was paid to the use of modern information and communication technologies in the off-site online assessment of a manufacturing facility. For the purpose of this Seminar, the term Distant Assessment was used to cover all types of off-site GMP evaluations of a pharmaceutical company.

The seminar consisted in presentations, panel discussions and workshops, which were repeated at different times for east (Asia, Australia) and west-bound (Europe, Africa &

America) participants. The last day consisted in a common live plenum broadcasted to all participants simultaneously.

In advance of the Seminar a survey was conducted among PIC/S PAs on off-site GMP evaluation. Its outcome, which was presented at the start of the seminar, showed that most PAs had only recently implemented distant GMP assessment due to COVID-19 restrictions. The terminology used by PAs varied considerably.

By means of live presentations, panel discussions or video-recordings, Australia / TGA, US FDA, EDQM, EMA (on behalf of EU Competent Authorities) as well as the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA) presented their approach and experiences with distant assessment. This was followed by a presentation by UK / MHRA on "information security in virtual real-time GMP assessment". Denmark / DKMA and Ireland / HPRA shared their experience on the basis of concrete case studies of real-time GMP assessment, which included the feedback from inspectors and inspected companies.

The workshops were done by MS Teams with groups of 10-15 inspectors. They allowed participants to get more in-depth knowledge on distant assessment. Three parallel workshops were organised on the following topics:

- When distant assessment is applicable – now and in the future. Lead: US FDA
- How to prepare for a distant assessment with a virtual real-time component. Lead: UK / MHRA
- Pros and cons of the different types of distant assessment. Lead: Singapore / HSA

On the last day, the workshop results were presented and discussed in a 2-hour plenary session. Distant assessment was seen as a valuable tool not only during a pandemic but also in normal times when unexpectedly on-site inspections cannot be carried out. However, there was a consensus that a virtual distant assessment will never replace a on-site inspection. Participants requested PIC/S to organise more training on distant assessment, in particular on its detailed execution in practice. They were also in favour that PIC/S develops guidelines on distant assessment.

Overall, the virtual seminar was considered a major success and its format made it possible for a larger number of GMP inspectors to participate. Compared with a standard, face-to-face seminar, there were no travelling costs and no time lost on travelling. Registration fees were also lower. However, the lack of personal interaction between participants was missed by participants. This interaction during face-to-face seminars allows for personal and professional contacts as well as the sharing of professional experience between inspectors.

Past and Future Seminars

In 2020, the SCT and the Committee reviewed:

- The evaluation report on the 2019 Seminar on "Quality Assurance of Sterile Medicinal Products – Annex 1", which was hosted by MHLW & PMDA in Toyama (Japan) on 13-15 November 2019;

- The preparations of the 2021 Seminar 2021 “GMP Assessment Approaches in Post COVID-19 Era” to be hosted virtually by Korea (Republic of) / MFDS on 8-10 November 2021.

24. Joint Visits Programme / Coached Inspection Programme

Due to the pandemic, the PIC/S Joint Visits Programme (JVP) and Coached Inspections Programme (CIP) was suspended for most of the year in the absence of on-site inspections and limited travel opportunities. Calls for volunteer inspectors were issued on 15 January 2020 (for all JVP groups) and 4 March 2020 (for Vet GCP & GVP JVP groups). No new JVP groups were established.

The JVP is open to PIC/S inspectors only and is particularly appreciated by inspectors specialised in specific fields of GMP, GDP, GCP and GVP.

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.

The participation in the JVP has been progressively extended from GMP inspectors to GDP, GCP and GVP inspectors. Joint Visits Groups for GCP/GVP are co-ordinated by the PIC/S Working Group on GCP/GVP.

In 2017, the Committee decided to open the JVP to GCP/GVP inspectors from PIC/S Applicant Authorities and from PIC/S countries/entities, where the competence for GCP/GVP is not with the PA.

In 2018, the SCT started working on a revision of the JVP Guidelines in order to clarify and improve the operation of the programme. The revised JVP Guidelines were circulated to Members for comments on 30 January 2020.

25. PIC/S New Inspector Training Course

Since 2011, Ireland / HPRA has run, on behalf of PIC/S, a "New Inspectors Training Course" (NITC) in Dublin (Ireland). This course is essentially designed for newly recruited inspectors. It is very popular amongst PIC/S inspectors and always well attended. A "Train the Trainer" course was also organised in 2014 in order to complement the NITC. Following a request by the SCT, Ireland / HPRA has agreed to conduct the NITC on a regular basis every 18 months with the support of trainers of other PIC/S PAs.

The last NITC was held in Dublin (Ireland) on 23-27 October 2017. The next course, to be organised by Ireland / HPRA, was supposed to take place in 2019 but then postponed to 2020 for logistic reasons and then put on hold due to the pandemic.

26. PIC/S Inspectorates' Academy (PIA)

The PIC/S Inspectorates' Academy (PIA) is the most prominent project under development in PIC/S. It is a global capacity building initiative in the field of training, developed by PIC/S PAs, which aims at delivering harmonised and standardised training to GMDP inspectors and establishing a uniformed qualification process of inspectors in order to ensure that high quality standards for medicinal products are met worldwide in the interest of public health.

THE PIC/S INSPECTORATES' ACADEMY (PIA)

PIA aims at delivering:

- Training to improve inspection expertise in the manufacturing of medicines and of their distribution
- for regulators by regulators, developed on the basis of PIC/S recognised GMP training experience and expertise since 1971
- supported by 53 PIC/S Participating Authorities from all continents
- for close to 2,000 inspectors worldwide
- offering currently over 600 training materials and 250 training videos
- webinars, on-line learning tools, forum which are in development
- a library of relevant GMP references.

This web-based educational centre, placed under the PIC/S umbrella, 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. It offers a single point of access to all PIC/S training activities. 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 is an ambitious project which will span several years and be implemented in stages. It is run and monitored by the Sub-Committee on Training.

The idea to establish a professional "Inspectors' Academy" delivering a variety of courses ranging from general training to highly specialised training for inspectors was

presented for the very first time at PIC/S' 40th Anniversary in 2011. The harmonisation and calibration of training as well as the standardised qualification of GMP Inspectors are key to a consistent interpretation and uniformed application of GMP by inspectors worldwide. This is key to mutual trust, which in turn will allow for mutual reliance between Competent Authorities (in line with the PIC/S Guidance on GMP Inspection Reliance). This will allow not only to maximize inspectional resources but also to strengthen the protection of public health by ensuring effective, high-quality and comparable GMP inspections for the quality of regulated pharmaceutical products.

PIA will also help pool together training resources for PIC/S PAs and thus contribute to cost savings for Agencies while strengthening co-operation, harmonisation and resource sharing in the field of training.

PIA was officially established at the PIC/S Committee meeting in Paris (France) on 20-21 October 2014. At its meeting in Nusa Dua (Indonesia) on 5-6 October 2015, the PIC/S Committee adopted the official PIA logo and its motto, which is **"Inspection Excellence through Harmonised Training"**. In July 2016, stage 1 of the Academy was launched successfully with its website and since then the incorporation of all existing PIC/S training.

Stages 2 & 3 are in progress and will encompass a fully integrated learning management system extending the current training resources available, on the basis of a harmonised training curriculum. This will include basic, specialised and ongoing levels, which will consist in a fine balance between e-learning modules and webinars designed to needs and face-to-face training. Delivery and monitoring are to be optimised and the training curriculum steps to result in recognised certification.

New training materials are developed and published on a continual basis on PIA. As of 31 December 2020, over 850 PIC/S training materials and videos were available on PIA and most of them had been rated according to their relevance and level (e.g. for new inspectors) with respect to a future training curriculum.

In 2019, the Committee endorsed in principle a number of key documents for the development of PIA. These documents outline an architecture for a harmonised PIA Training Programme, including its related training Curricula and Cycle (see chart on next page) and Qualification Process. The PIA Training Programme aims to define harmonised minimum training requirements (and related curricula) in specific fields (e.g. API, sterile, biologicals, etc.). Training will be based on high quality training materials focusing on GMP requirements and inspection skills, to be delivered through various formats. The formats are to be provided either through training tools offered by PIA or by the PIC/S PAs or both. Subject to the availability of financial and human resources, the Committee also endorsed in principle the development of a Learning Management System (LMS) including e-learning modules.

In 2020, thanks to a generous grant by Chinese Taipei / TFDA, a LMS was successfully developed under PIA. The LMS is the backbone for the management of PIA's training tools and content. The next step will consist in integrating content into PIA and developing modules, starting with a pilot module on Quality Risk Management (QRM), which is in the process of being developed with the assistance of the Expert Circle on QRM. The latter has also drafted a Curriculum on QRM for GMP Inspectorates, which has been published on the password-protected part of the PIA website.

Outline of PIA Training Cycle

To facilitate the financing of PIA, the Secretariat has prepared – together with the SCT, SCB and EB – a Project Plan on PIA, which was circulated to all PIC/S Heads of Agencies along a call for voluntary contributions at the end of 2020. The project plan, which aims to ensure the adequate and timely planning of the project, was developed alongside of a 5-year Budget Plan for the period 2020-2024.

27. ICH Q12 Training Material

In 2020, the Committee established a PIC/S Working Group on Training Material for ICH Q12 (Pharmaceutical Product Lifecycle Management) under the chairmanship of the SCT Chairman, Jacques Morénas (France / ANSM). The mandate and the WG Members were confirmed by written procedure in May 2020. The WG met several times during the year to elaborate training material, jointly with the PIC/S Expert Circle on QRM. This material included a draft "PIC/S Recommendation on how to evaluate and demonstrate the effectiveness of a PQS" with at annex a "Sample Format for Notification of PQS Robustness" and a draft "Procedure for Exchanging Information on Serious Non-Compliance related to PQS". This training material will be presented to PIC/S inspectors at a webinar to be held in 2021. The webinar and the related training material will be financed thanks to a grant by ICH.

28. Co-operation with other Agencies & Organisations

The annual GMP Training Course, organised by Japan / PMDA and the Asia Training Center (ATC), was postponed to 2021 due to the pandemic. Other joint training projects were also all put on hold.

29. EXPERT CIRCLES

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.

The main task of the Sub-Committee on Expert Circles (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

The SCEC is chaired by Andreas Krassnigg (Austria / AGES) and met once in 2020 on 18 March 2020. A number of Expert Circles and Working Groups operate under the SCEC – their activities are described below. Most Expert Circles' activities were impacted by the pandemic and had fewer activities in 2020 in comparison with previous years.

Expert Circle on API

The Expert Circle on Active Pharmaceutical Ingredients (APIs) was established by PIC/S in 2005. It meets on average every two years. The Expert Circle last met in Madrid on 7-9 October 2019. Due to the pandemic, the date and venue of the next meeting have not been determined yet. Since January 2020 the Expert Circle is chaired by Linda Gallais (France / ANSM).

Expert Circle on Controlling Cross Contamination in Shared Facilities

The Expert Circle on Controlling Cross Contamination in Shared Facilities (CCCISF) was established in 2017. It was first chaired by Graeme McKilligan (UK / MHRA) and now by Vimal Sachdeva (WHO).

The 1st Expert Circle meeting was hosted by Chinese Taipei / TFDA in Taipei on 19-21 June 2019. The 2nd Expert Circle meeting will be hosted by WHO at its European Regional Office in Copenhagen (Denmark) in Q3/Q4 2021, provided that travel and other restrictions linked to the pandemic will be lifted in time for the meeting.

Expert Circle on GDP

The Expert Circle on Good Distribution Practice (GDP) was established in 2013 and organised five meetings between 2013 and 2018. The Expert Circle, chaired by Karen Ford (South Africa / SAHPRA), was planning to organise its 6th meeting in Kyiv (Ukraine) on 26-28 May 2020. However, due to the pandemic, Ukraine / SMDC had no other choice than to cancel the meeting.

Expert Circle on Human Blood, Tissues, Cells & ATMPS

The Expert Circle on Human Blood, Tissues and Cells is the oldest Expert Circle in PIC/S. In 2015, the Expert Circle expanded the scope of its mandate to include Advanced Therapies Medicinal Products (ATMPs). It is led by Marisa Delbò (Italy / AIFA), who was re-elected as Chair of the Expert Circle in 2020. Ms Delbò also serves as SCEC Deputy Chairperson.

At its 25th meeting in Jakarta on 8-10 October 2019, the Expert Circle agreed that its next face-to-face meeting would be held in early 2021. Due to the pandemic and related uncertainties, in particular regarding travelling, the Co-ordinating Committee of the Expert Circle has investigated alternative meeting opportunities for 2021 in co-operation with other organisations such as the Commission Expert Sub-Group on Inspections in the Blood and Tissues & Cells Sectors (IES) and PDA.

Expert Circle on QRM

The Expert Circle on Quality Risk Management (QRM) was the only active Expert Circle in 2020. Initially established in 2007, the Expert Circle has organised a series of Advanced QRM Training Courses in line with its new mandate adopted in 2017. The Expert Circle is chaired by Kevin O'Donnell (Ireland / HPRA) since 2019.

Back in November 2019, and following contacts between the representative of Turkey / TMMDA in the PIC/S Committee and the Chairman of the Expert Circle, TMMDA accepted to host a 3-day event in Istanbul. In early 2020, when the pandemic started, TMMDA and the Co-ordinating Committee of the Expert Circle decided to turn the planned event into a webinar, virtually hosted by TMMDA.

The webinar took place on 24 September 2020 and was a great success, as shown by the exceptionally high number of participants for such an event. 205 delegates from 53 countries and 3 partner organisations participated in this first webinar ever organised by a PIC/S Expert Circle. Thanks to the promotion made by the "Africa-wide PIC/S Initiative", an association which aims at promoting PIC/S in Africa, there were numerous representatives from African Regulatory Authorities, in particular Congo, Gambia, Kenya, Libya, Malawi, Namibia, Somalia, Tanzania, Tunisia, Uganda, Yemen, Zambia and Zimbabwe. For many of them, it was their first attendance of a PIC/S training event.

In an effort to reach out to French and Portuguese-speaking Regulatory Authorities in Africa, the Africa-wide PIC/S Initiative has dubbed the related video recordings into French and Portuguese and graciously made them available on the PIA website as well as to selected Non-Members of PIC/S.

In addition to the webinar, the Expert Circle has collected comments in relation with Step 1 of the adoption process on the draft "PIC/S Recommendation on How to Evaluate / Demonstrate the Effectiveness of a Pharmaceutical Quality System in relation to Risk-based Change Management" (PI 054-1 (Draft 1)). This draft was applied on a trial basis by PIC/S PAs for a 1-year period (28 November 2019 – 27 November 2020) with a possibility to send their comment to the Expert Circle.

An ad-hoc Working Group, which reports to the QRM Expert Circle, was successfully established by written procedure on 31 January 2020 for the revision of the PIC/S Aide Memoire on QRM Implementation (PI 038-1). Its members were appointed on 8 May 2020. The Working Group is led by Rick Friedman (US FDA).

Working Group on GCP / GVP

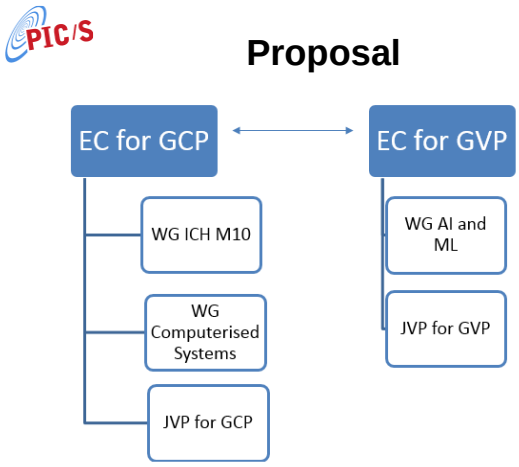
The Working Group on Clinical Practices (GCP) and Good Pharmacovigilance Practices (GVP) was established in July 2014 with the aim to facilitate technical co-operation and harmonisation of practices (including the development of guidance and training material), capacity building and information sharing. The Working Group was chaired by Mandeep Rai (UK / MHRA) from 2014 to 2019. It is now chaired by Mandy Budwal-Jagait (UK / MHRA).

The Working Group is very active in the field of training through the PIC/S Joint Visits Programme (JVP), allowing 3 inspectors from 3 different countries to team up in order to observe inspections in each country with a view to comparing inspections procedures

and techniques. It has prepared JVP specific guidelines for conducting GCP and GVP Inspections, which entered into force on 1 January 2018.

In 2019, the Committee reviewed a summary report prepared by the Working Group on the basis of 27 JVP reports during the period 2013-17: this summary report highlights recommendations by the various JVP groups as well as similarities and differences in the way GCP/GVP inspections are carried out.

In 2020, the Working Group discussed the possibility to split the Working Group into two distinct Expert Circles: one on GCP and one on GVP (see chart below). Both will promote the Joint Visits Programme. The Expert Circle on GCP will have a Working Group on ICH M10 (multidisciplinary) as well as a Working Group for computerised systems. The Expert Circle on GVP will have WG on artificial intelligence and machine learning. The WG's proposal will be discussed by the SCEC and the Committee in 2021.



Working Group on Medicinal Products for Veterinary Use (VMP)

In 2016, the Committee established an Ad Hoc Working Group on Veterinary Medicinal Products (VMP) in order to assess the need to have a VMP-specific platform in PIC/S. Following a survey, which revealed the need for such a platform, the Committee adopted a mandate for a Working Group on VMP, which was formally established in April 2019.

The Working Group on VMP held a first meeting in October 2019. It comprises experts from Canada / ROEB, Czech Republic / ISCVBM, France / ANSES-ANMV, Germany / ZLG, Switzerland / Swissmedic, UK / VMD, and US FDA. It is chaired by Grégory Verdier (France / ANSES-ANMV) with Jason Todd (UK / VMD) acting as Deputy Chairman.

In 2020, the Working Group started to work on a concept note on the revision of veterinary specific GMP guidelines (Annex 4 on Manufacture of Veterinary Medicinal Products other than Immunological Veterinary Medicinal Products and Annex 5 on Manufacture of Immunological Veterinary Medicinal Products) through the joint EMA-PICS drafting group. The Working Group also plans to develop new veterinary specific guidance in co-operation with EMA.

Working Group on Computerised Systems

The Working Group on Computerised Systems comprises 9 experts and is chaired by Denmark / DKMA. Its task is to revise the PIC/S Good Practices for Computerised Systems (PI 011), which is partially outdated. The Working Group was put on hold following the launching of the revision of Annex 11 (Computerised Systems) of the EU-PIC/S GMP Guide, which will impact on the PIC/S guidance.

30. STRATEGIC DEVELOPMENT & CO-OPERATION

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. It elaborated, amongst other proposals, a project to establish a sub-committee structure under the PIC/S Committee, which was implemented in 2014.

The mandate of the SCSD has since then been widened to define PIC/S' strategy and future policy and to make proposals on how to improve the structure and the operation of PIC/S as well as co-operation with PIC/S Associated Partner Organisations. 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

More recently, the SCSD has taken a number of initiatives aiming at strengthening international regulatory co-operation in the field of GMP. The objective of these initiatives is to improve the sharing of GMP information between PIC/S PAs as well as to facilitate mutual reliance on a voluntary basis.

The SCSD is chaired by Susan Laska (US FDA). It held two virtual meetings in 2020: the first on 4 June and the second on 20 October. Four Working Groups operate under the SCSD.

31. Working Groups operating under the SCSD

1. Unique Facility Identifiers (UFI)

The PIC/S Working Group on the Unique Facility Identifiers (UFI) for drug establishments was established in 2016 following a survey by US FDA showing that PIC/S PAs use different systems to identify the location of a drug manufacturing site. The Working Group consists of representatives of Canada / ROEB, EDQM, EMA, Spain / AEMPS, UK / MHRA and US FDA. Its mandate was adopted in 2017. The purpose of the Working Group is to have a harmonised and consistent system in order to localise a manufacturing site.

The Working Group, co-chaired by Susan Laska (US FDA) and Jennifer Maguire (US FDA), held several meetings in 2020 and discussed the system of geo-localisation currently used by the Working Group Members. It aims now at preparing a template on geo-coordinates, which should be presented to the PIC/S Committee in 2021.

2. Travel Safety

The Working Group on inspectors' travel safety was established following the 2016 Seminar in Manchester. Its mandate was approved at the Committee meeting in Chicago in September 2018. The Working Group, which is led by Tracy Moore (UK / MHRA), comprises representatives from Australia / TGA, Brazil / ANVISA, Canada / ROEB, EDQM, Indonesia / NADFC, Ireland / HPRA, Netherlands / IGJ, Sweden / MPA, Thailand / Thai FDA, UK / MHRA, and US FDA.

The aim of the Working Group is to consider means to mitigate health, security or site-related risks affecting inspectors. In 2020, the Working Group held one meeting on 17 November 2020 and discussed a draft for a "COVID-19 risk assessment for routine on-site inspections" (PI 055-1), which will be circulated to Members for comments in 2021.

3. Informants

The Working Group on Informants, co-led by UK / MHRA and US FDA, was set up in 2019 following the adoption of a mandate focusing on three priorities: the definition and distinction between "informants" and "whistle blowers"; the limitations regarding inspectors' involvement; and how to handle intelligence from informants.

Due to the pandemic, the Working Group has been put on hold and will resume its activities at a later stage.

4. Inspection Reliance

Although the Working Group on PIC/S Inspection Reliance was only established in 2020, inspection reliance has a long history in PIC/S.

In the context of increased foreign inspections, PIC/S has taken a number of measures over the past few years to reduce duplicate foreign inspections such as through the maintenance of a list of planned foreign inspections (since 2012) as well as through the adoption of various procedures such as the PIC/S procedure for team inspections (PI 031-1), in force since 1 September 2009, and the "Procedure to inform Foreign Regulatory Agencies of Foreign Inspections to be conducted in their Jurisdiction" (PI 039-1), which entered into force on 1 November 2015.

In 2015 a survey on "same scope inspections" was carried out amongst all PIC/S PAs to understand how Members deal with "same scope inspections", i.e. GMP inspections having the same scope and thus redundant. The survey provides an overview on similarities and differences between PAs in accepting (or refusing) information on GMP inspections from other PAs.

In 2017, the Committee accepted an offer from the International Coalition of Medicines Regulatory Authorities (ICMRA) to take over the ICMRA GMP project and to adapt the ICMRA draft Guidance on Inspection Reliance for PIC/S purpose. The aim of this guidance is to maximise inspection resources by relying on other trusted Regulatory Authorities for the GMP compliance of overseas facilities. The PIC/S network provides a strong foundation for this process by ensuring the capability of PAs via the PIC/S accession process and Joint Reassessment Programme. The PIC/S Guidance on Inspection Reliance (PI 048-1) was adopted by the Committee in April 2018 with an entry into force on 1 June 2018.

In 2019, PAs were invited to collect statistics on desk-top assessments. The purpose of these statistics is to document the efforts made by PIC/S PAs to rely on existing inspection reports rather than duplicate foreign GMP inspections. These statistics were shared with the Committee in 2020 and showed that a total of around 7,400 inspections were waved in 2019 by PIC/S Members. Some were waived because the inspection report was provided by a PIC/S PA and used as a basis for a desk-top assessment; others were waived on the basis of a GMP certificate recognised under a Mutual Recognition Agreement (MRA). Many PAs do not distinguish between PIC/S and MRA in their national statistics.

The 2019 statistics also revealed a marked difference between PAs, which are EU/EEA Competent Authorities and which only rely on EU/EEA or MRA GMP certificates, and PAs, which are not Members of the EU/EEA and which rely on MRA GMP certificates and, more generally, on PIC/S inspection reports.

In order to identify barriers that prevent PAs to rely on already existing inspection reports, the Committee, based on a proposal by the SCDC, established a Working Group on Inspection Reliance on 6 October 2020. The Working Group, led by Stephen Farrell (Australia / TGA), comprises 7 Members from 6 PAs.

32. PIC/S Pilot on Compliance Management

In 2019, the Committee discussed whether to adopt, for PIC/S purposes, the EU Compliance Management Procedure. This procedure focuses on borderline compliant cases, where a GMP certificate has been issued but the manufacturer is under increased surveillance. It agreed to launch a pilot on "borderline cases" between interested PAs to determine (i) public health and regulatory benefits, and (ii) the actual level of administrative burden to share information. However, due to the pandemic, the pilot was put on hold in 2020. It is scheduled to be re-discussed in 2021, as a number PAs expressed an interest to participate in the pilot if the latter is clarified in terms of scope and workload.

33. Co-operation with Associated Partners and other Organisations

Associated Partners (EDQM, EMA, OIE, UNICEF and WHO)

In 2020, PIC/S continued to co-operate closely with Associated Partner Organisations, namely:

- European Directorate for the Quality of Medicines & HealthCare (EDQM),
- European Medicines Agency (EMA),
- United Nations International Children's Emergency Fund (UNICEF),
- World Health Organization (WHO), and
- World Organisation for Animal Health (OIE).

This co-operation was particularly evident in fields covered by the respective co-operation agreements such as the harmonisation of GMP guides and guidance documents, the exchange of audit reports on the (re)assessment of Competent Authorities, the sharing of information on foreign GMP inspections, and the participation in training events and expert discussions.

Other organisations

ASEAN

In 2019, an exchange of letters was signed between PIC/S and the ASEAN Pharmaceutical Product Working Group (PPWG) related to co-operation on GMP related matters. Based on a recommendation by the SCSD, the PIC/S Committee also agreed to initiate a similar exchange of letters with the ASEAN Traditional Medicines Health Supplements Product Working Group (TMHS PWG). Due to the pandemic, the project was put on hold in 2020.

Heads of EEA Medicines' Agencies

Under the framework of a letter of agreement between PIC/S and EU/EEA Heads of Medicines Agencies (HMA), which entered into force on 15 August 2016, PIC/S and HMA continue to co-operate in exchanging information in the context of the EEA Joint Audit

Programme (JAP) of GMP Inspectorates and the PIC/S Joint Reassessment Programme (JRP) of PAs, which ensures that both new and current PIC/S PAs meet the same requirements. PIC/S and HMA also recognise that in the EEA context the EEA JAP and the PIC/S JRP are deemed equivalent. Audit schedules are also exchanged between the two parties with a view to avoid any duplication and foster mutual acceptance and recognition of audits as well as maintain equivalent auditing tools and programmes, including joint training of auditors. In 2020, PIC/S and EMA continued to shared audit reports as well as information on upcoming (re)assessments.

ICMRA

An exchange of letters has taken place with the Chair of the International Coalition of Medicines Regulatory Authorities (ICMRA) on opportunities on further regulatory collaboration.

ISPE

PIC/S was invited to participate in the virtual ISPE 2020 Annual Meeting on 1-4 November 2020. The PIC/S Chairperson also presented virtually at the ISPE Europe Annual Conference 2020 on 16-17 September 2020. In addition, the PIC/S Chairperson and Mr Christian Schaerer (Switzerland / Swissmedic) jointly presented at the 2020 ISPE Pharma 4.0™ Virtual Conference on 17-18 November 2020 on the topic of GMP inspection reliance.

OECD

The PIC/S Chairperson was invited to present as a speaker at the 7th Annual Meeting of International Organisations organised virtually by the Organisation for Economic Co-operation and Development (OECD) on 3 September 2020.

PDA

The PIC/S Chairperson was invited to speak at the PDA Europe Conference on 9-11 June 2020 while the former Chair of the PIC/S WG on Annex 2, Francesco Cicirello (formerly with Australia / TGA), presented on Annex 2A & 2B of the PIC/S GMP Guide at the PDA ATMP conference on 24-25 June 2020.

34. BUDGET, RISK & AUDIT

The Sub-Committee on Budget (SCB) was established back in 2004. With the introduction of the new Sub-Committee structure in 2014 its mandate has been widened in order to encompass issues related to risk and audit. For the full mandate, see on next page.

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

The Sub-Committee on Budget, Risk and Audit (SCB) is chaired by Ger Jan van Ringen (Netherlands / IGJ). It held two virtual meetings: the first on 28 April 2020 and the second on 27 October 2020, during which it reviewed the PIC/S accounts and prepared the budget, as detailed below.

35. 2019 Accounts

The SCB reviewed the report on the 2019 accounts by the external auditor, Moore Stephens Refidar S.A. The report was then submitted to Members by written procedure, as no PIC/S Committee meeting took place in 2020. On the basis of the auditor's report, the Committee approved the Statement of Accounts for the Financial Year 2019. It agreed to transfer the 2019 balance and the bank interests for a total of CHF 16,131.58

to the PIC/S Reserve Fund. It also discharged the Secretary of his responsibility for the 2019 accounts.

The SCB also reviewed the financial part of the report on the 2019 Seminar, which resulted in a surplus that Japan MHLW & PMDA generously donated to PIC/S.

36. 2020 Accounts

The SCB reviewed the status of income and expenditures of the 2020 accounts during the year while the Committee appointed the external auditor, Moores Refidar S.A., for the financial audit of the 2020 accounts, which is scheduled to take place in early 2021. The approved net budget for the financial year 2020 totals CHF 773,730.

37. 2021 Budget

As recommended by the SCB, the Committee approved by written procedure, successfully completed on 11 December 2020, the 2021 PIC/S Budget for an amount of CHF 1,064,270. The increase of the budget is mainly due to the development of PIA.

38. Budget Plans

In the course of 2020, the SCB also discussed two budget plans: the PIC/S 3-year Staff Increase Budget Plan and the PIA 5-year Budget Plan. In line with PIC/S Financial Regulations, budget plans are established by the SCB “to assess future commitments and income”.

The Staff Increase Budget Plan for the period 2021-23 foresees an increase of the PIC/S Secretariat, which will be financed by a gradual increase of the annual membership fee from CHF 8,500 to CHF 9,900 over two years (2022-23). The budget plan has been prepared in reply to the “Note on the Reorganisation of the Secretariat and the Executive Bureau”, which was endorsed by the EB at its meeting in Toyama and circulated to the Committee in January 2020. The Note underlines the need to increase human resources at the Secretariat in order to match the significant increase of PIC/S activities over the past 15-20 years. It will be discussed at the next PIC/S Committee meeting in 2021.

The PIA 5-year Budget Plan for the period 2020-24 has been prepared by the Secretariat in close co-operation with the EB, SCB and SCT. It aims at securing the financing of PIA in line with its development, as described in the Business Plan. The Budget Plan foresees an escalation of income and expenses in the first four years (2020-2023), corresponding to the building up of PIA, followed by a stabilisation of the budget (from 2024) focusing on maintenance.

39. COMMUNICATION

PIC/S regularly communicates on its activities through press releases, annual reports and its web site. Good communication between PAs 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 (SC COM).

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. In 2020, the scope of the mandate was expanded in order to cover the overall co-ordination with ICH. For the amended 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. Represent PIC/S in the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). Co-ordinate PIC/S relations with ICH in co-operation with other involved Sub-Committees and disseminate relevant ICH information and guidelines to PIC/S PAs.

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

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

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

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

Since 1 January 2020, the SC COM has a new Chairman in the person of David Churchward (MHRA / UK), who was elected at the Toyama Committee meeting. The SC COM held two virtual meetings in 2020: on 2 March and 21 October. During these meeting, it discussed ICH matters as well as communication-related topics, as listed below.

40. Co-operation with ICH

Since June 2017, PIC/S enjoys an observer status with the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). The PIC/S representative to ICH is the SC COM Chairman, who attends ICH Assembly meetings. In 2020, he participated in the virtual ICH Assembly meetings on 27 May and 18 November 2020. A number of PIC/S experts also take part in ICH Expert Working Groups (EWG), in particular E6(R3) (on GCP); M10 (Bioanalytical method validation), Q9(R1) (on QRM), Q12 (Pharmaceutical Product Lifecycle Management) and Q13 (Continuous Manufacturing).

In 2019, the ICH Management Committee (MC) made a proposal to PIC/S for more routine engagement between the two organisations. Following a bilateral meeting between the ICH MC Chair, Dr Theresa Mullin (US FDA), and the Executive Bureau in Toyama, a pilot on was successfully launched in April 2020. It covers co-operation on ICH Q Guidelines between the two organisations in two specific ICH EWG: Q9 and Q12.

To facilitate the involvement of PIC/S in ICH EWGs, the SC COM has drafted an SOP, which was circulated for comments to the PIC/S Committee in November 2020. Co-operation with ICH will be further discussed at the next Committee meeting in 2021.

41. Foreign Inspections

The list of foreign inspections planned by PIC/S PAs and Partner Organisations in 2020 was circulated on 8 February 2020 and then updated on 24 April 2020. Due to the COVID-19 pandemic, no further calls or updates were made. Instead, a survey has been conducted to identify PAs, which have resumed with foreign inspections, either on-site or at distance. This survey has proven to be useful in the context of increased inspection reliance between PIC/S PAs. By the end of 2020, most PAs had not resumed foreign inspections yet.

In 2020, the SC COM also reviewed past data on foreign inspections and concluded that only a few sites are inspected by more than one PA. However, not all PAs contribute to the PIC/S List of Foreign Inspections and as a result, there may be more duplicate inspections. The SC COM also circulated a survey to identify which PAs publish a list of domestic inspections on their websites.

42. Communications from / to Members

Two communications were sent by the SC COM Chairman in the course of 2020 to all PIC/S PAs to encourage the use of the PIC/S network to share (i) relevant information on COVID-19 supply chain risks and (ii) GMP-relevant information (e.g. inspection reports) under the PIC/S inspection reliance initiative (PI-048) at a time, when foreign inspections cannot be carried out due to the pandemic.

43. Other SC COM issues

The SC COM, together with the Secretariat, has continued to work on the following issues:

- PIC/S stakeholder mapping;
- List of GMDP Inspectors employed by PIC/S PA and Partners.
- List of PIC/S Single Contact Points (SCP);
- New standard presentation on PIC/S and promotional video on PIC/S;

- Questionnaire to determine the utilisation and implementation of PIC/S guidance documents;

- PIC/S presence on social media.

With regard to the Working Group in charge of transposing, for PIC/S purposes, the revised EMA procedures on (i) Managing Reports of Suspected Quality Defects in Medicinal Products; and (ii) Handling Rapid Alerts Arising from Quality Defects, it has remained on hold while waiting for the relevant EMA procedures to be adopted.

44. PIC/S Website

The PIC/S website https://www.picscheme.org was regularly updated throughout the year and some changes were made to the password-protected Members' Area as well as the PIA sub-site.

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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 2020)

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

	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 Canada - Regulatory Operations and Enforcement Branch (ROEB) (*Santé Canada - Direction générale des opérations réglementaires et de l'application de la loi (DGORAL)*)	ROEB
Chinese Taipei	Taiwan Food and Drug Administration	TFDA
Croatia	Agency for Medicinal Products and Medical Devices of Croatia (*Agencija za lijekove i medicinske proizvode*)	HALMED
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 Medicines Agency	DKMA
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 Agency for Medicines and Health Products Safety)*	ANSM
	Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail (*French Agency for Food, Environmental & Occupational Health Safety*)	ANSES

[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
Hong Kong SAR	Pharmacy and Poisons Board of Hong Kong	PPBHK
Hungary	National Institute of Pharmacy and Nutrition	NIPN
Iceland	The Icelandic Medicines Agency	IMA
Indonesia	National Agency for Drug and Food Control	NADFC
Iran	Iran Food and Drug Administration	IFDA
Ireland	Health Products Regulatory Authority	HPRA
Israel	Institute for the Standardization and Control of Pharmaceuticals	ISCP
Italy[4]	Agenzia Italiana del Farmaco	AIFA
	Directorate General for Animal Health and Veterinary Medicinal Products (Direzione generale della sanità animale e dei farmaci veterinari)	DGSAF
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 *(Office of Healthcare)*	AG
Lithuania	State Medicines Control Agency	SMCA
Malaysia	National Pharmaceutical Regulatory Agency	NPRA
Malta	Malta Medicines Authority	MMA
Mexico	Federal Commission for the Protection Against Sanitary Risks *(Comisión Federal para la Protección contra Riesgos Sanitarios)*	COFEPRIS
Netherlands	Inspectie voor de Gezondheidszorg en Jeugd *(Health and Youth Care Inspectorate)*[6]	IGJ

[3] BMG and ZLG count as one Participating Authority. All German Medicinal Authorities, which are listed on the ZLG web site, are considered as PIC/S Participating Authorities and are represented in PIC/S by ZLG.

[4] AIFA and DGSAF count as two distinct Participating Authorities.

[5] MHLW, PMDA and the Japanese Prefectures count as one Participating Authority. The Japanese Prefectures are represented by MHLW.

[6] The competence for GMP/GDP inspections in the Netherlands is allocated to the central authority, the Health and Youth Care Inspectorate (IGJ). IGJ is the PIC/S Participating Authority

New Zealand	Medicines and Medical Devices Safety Authority	Medsafe
Norway	Norwegian Medicines Agency	NOMA
Poland	Chief Pharmaceutical Inspectorate	CPI
Portugal	Autoridade Nacional do Medicamento e Produtos de Saúde IP (*National Authority of Medicines and Health Products IP*)	INFARMED IP
Romania	National Agency for Medicines and Medical Devices of Romania	NAMMDR
Singapore	Health Sciences Authority	HSA
Slovak Republic	State Institute for Drug Control	SIDC
Slovenia	Agency for Medicinal Products and Medical Devices	JAZMP
South Africa	South African Health Products Regulatory Authority	SAHPRA
Spain	Agencia Española de Medicamentos y Productos Sanitarios *(Spanish Agency for Medicines and Medical Devices)*[7]	AEMPS
Sweden	Swedish Medical Products Agency	MPA
Switzerland	Swiss Agency for Therapeutic Products	Swissmedic
Thailand	Food and Drug Administration	Thai FDA
Turkey	Turkish Medicines and Medical Devices Agency	TMMDA
Ukraine	State Service of Ukraine on Medicines and Drugs Control	SMDC
United Kingdom[8]	Medicines and Healthcare Products Regulatory Agency	MHRA
	Veterinary Medicines Directorate	VMD
United States of America	United States Food and Drug Administration	US FDA

representing GMP/GDP for human as well as veterinary medicinal products. IGJ performs national and international GMP/GDP inspections representing the Health and Youth Care Inspectorate - Pharmaceutical Affairs as well as the Medicines Evaluation Board - Veterinary Medicinal Products Unit, which is mandated to issue GMP certificates on behalf of the Ministry of Economic Affairs.

[7] The competence for GMP/GDP inspections in Spain is shared between the central authority, Spanish Agency for Medicines and Medical Devices (AEMPS), and the Spanish regional authorities, which count as one PIC/S Participating Authority. All Spanish Medicinal Authorities, which are listed on AEMPS' web site, are considered as PIC/S Participating Authorities and are represented in PIC/S by AEMPS.

[8] MHRA and VMD count as two distinct Participating Authorities.