PHARMACEUTICAL INSPECTION CONVENTION
PHARMACEUTICAL INSPECTION CO-OPERATION SCHEME

PS/W 3/2023
11 May 2023

PIC/S WORK PLAN FOR 2023

Approved by the PIC/S Committee by at its meeting in Geneva (Switzerland) on 11-12 May 2023

1. In 2023, the PIC/S Committee will meet twice in person: first, in Geneva (Switzerland) on 11-12 May 2023; and then, in Bangkok (Thailand) on 6-7 November 2023 in connection with the 2023 PIC/S Annual Seminar, hosted by Thai FDA, from 8 to 10 November 2023. The topic of the seminar will be "Soft Skills that Make a Good GMP/GDP Inspector in 2023".

2. Both Committee meetings will be preceded by a half-day meeting of the PIC/S Executive Bureau (EB) in the morning of 11 May and 8 November 2023.

COMPLIANCE

3. The objective for 2023 is to make up for delays having affected assessments and reassessments in 2023-20 due to the pandemic and other events, and reschedule all visits, subject to priorities and the availability of resources.

4. Resources have been strengthened in 2022 through the joint organisation with the European Commission (EC) and the Joint Audit Programme (JAP) of EEA Heads of Medicines Agencies of a training for Joint Reassessment Programme (JRP) and EEA Joint Audit Programme (JAP) auditors. JAP assessments and JRP reassessments are deemed equivalent. Training of auditors will continue to be developed through close links with EU Joint Action on Health (EU4H 11) which covers the (re)assessment process of EU MS Competent Authorities.

5. The following Competent Authorities having applied for accession or pre-accession and will be assessed / continued to be assessed in 2023 (dates are tentative and may change):

In alphabetical order

Name	**Status**	**Step**	**By (estimate)**
Armenia / SCDMTE	Applicant	Update of application	Q2-Q3
Azerbaijan / AEC	Pre-applicant	Closure of pre-accession*	Q2
Bulgaria / BDA	Applicant	On-site assessment visit	Q1
		Review of assessment visit report by SCC and CO	Q2
China / NMPA	Pre-Applicant	Closure of pre-accession	Q1

Jordan / JFDA	Applicant	Update of application within frame of documentation review	Q1
		On-site assessment visit	Q4
Saudi Arabia / SFDA	Applicant	On-site assessment visit	Q1
		Review of assessment visit report by SCC and CO	Q2

*subject to discussions at Committee meeting in Geneva

6. Due to travel restrictions to Russia, the application by the Competent Authorities of Russia, i.e. Minpromtorg, Roszdravnadzor, FSI “SID & GP”, and FSBI "SCEMD”, will remain frozen until further notice.

7. The following PA will be reassessed under the PIC/S Joint Reassessment Programme (JRP):

In alphabetical order

Name	**Step**	**Tentative date**
Chinese Taipei / TFDA	Nomination of Team	Q1
	Documentation review	Q2-Q3
	On-site reassessment visit	Q3-Q4
Indonesia / NADFC	Nomination of Team	Q1
	Documentation review	Q2-Q3
	On-site reassessment visit	Q4
Japan / MHLW, PMDA and Prefectures	Nomination of Team	Q1-Q2
	Documentation review	Q3-Q4
	On-site reassessment visit	2024
Korea (Republic of) / MFDS	Nomination of Team	Q1-Q2
	Documentation review	Q3-Q4
	On-site reassessment visit	2024
New Zealand / Medsafe	Review of desktop assessment by CO	Q2
South Africa / SAHPRA	Documentation review	Q2-Q3
	On-site reassessment visit	Q3-Q4

Note 1: The term “documentation review” refers to the proposed method of evaluation of the Audit checklist (PS/W 1/2005) where a number of indicators can be evaluated remotely. Other indicators can only be reviewed during the on-site reassessment visit, which takes place in the jurisdiction of reassessed Participating Authority. The term “desktop assessment” refers to the possibility to reassess a Participating Authority remotely with no on-site visit.

Note 2: Dates are tentative and may change subject to priorities and availability of resources.

8. All assessment and reassessment activities will be co-ordinated and monitored by the Sub-Committee on Compliance (SCC).

9. Subject to the availability of resources, the SCC will consider proposals for (i) the introduction of an annual reporting system (in order to monitor the continued compliance of PAs with PIC/S requirements); and (ii) the establishment of a list of experienced auditors to assist and advise new rapporteurs and auditors. The SCC will also consider opportunities for consolidating possible synergies and exchange of information with other assessment

frameworks such as the EC API white-listing and WHO benchmarking of regulatory systems, which are different in scope and procedure.

10. Contacts will be established (or maintained) with non-Member Competent Authorities, which have signalled an interest in the PIC/S pre-accession process or membership. It will also consider ways on engaging Pre-Applicant Authorities once the process has been completed.

TRAINING AND EXPERT DISCUSSIONS

11. PIC/S will continue to provide training to GMDP inspectors and organise expert discussions on various GMDP topics. The main training event in 2023 will be the annual seminar hosted by Thailand / Thai FDA in Bangkok on 8-10 November 2023. The seminar topic is on “Soft Skills that Make a Good GMP/GDP Inspector in 2023”.

12. The implementation and development of the PIC/S Inspectorates’ Academy (PIA), in particular of additional e-learning modules further to the successful delivery in 2022 of e-modules on QRM / ICH Q9 and ICH Q12, will remain a key focus and priority of the Sub-Committee on Training (SCT), which is in charge of monitoring PIA. A number of e-learning modules for 2023 are currently in preparation such as on soft skills; and on JRP-JAP auditor training in connection with EU Joint Action on Health. A recorded presentation on differences between the old and the new versions of Annex 1 will be published as part of a common PIC/S-EC-EMA-WHO training plan for inspectors on revised Annex 1. New modules on a number of training topics identified as priorities (e.g. PQS and related areas) will be developed. The Learning Management System (LMS) of PIA will be launched with the PIA Training Programme which includes a number of curricula for the training and qualification of PIC/S inspectors. Practical guidance for users as well as for authors developing e-learning modules will be issued. To meet deadlines and objectives, all this will require increased and substantial efforts, notably in the field of human resources. Moreover, the funding and financing of PIA will remain critical to ensure its planned development in line with the PIA Business Case and the PIA Multiannual Budget Plan, both of which will be updated.

13. The Sub-Committee on Expert Circles (SCEC) will continue to monitor the activities of the various PIC/S Expert Circles and Working Groups operating under its responsibility.

14. The Expert Circle on Human Blood, Tissues, Cells and ATMP jointly with the PIC/S Working Group on ATMPs will organise virtually the 26th PIC/S Expert Circle Meeting on Human Blood, Tissues, Cells and Advanced Therapy Medicines Products (ATMPs) and Webinar on the new Annex 2A (on ATMPs) of the PIC/S GMP Guide from 14-16 March 2023, hosted by Austria / AGES. Presentations and video recordings of the training on Annex 2A will be published on PIA. The Co-ordinating Committee (CC) will also work on finalising three PIA training curricula for inspectors specialised in the inspection of (i) ATMPs; (ii) blood establishments, hospital blood banks and plasma warehouses*; (iii) and tissues & cells establishments*. The CC also plans to prepare for the next Expert Circle meeting to be hosted in 2024 by Malaysia / NPRA as well as prepare a concept note to propose the establishment of a new working group for the preparation of an aide memoire for inspections to ATMPs manufacturing sites. The current list of Competent Authorities for (GMP) inspections in the field of human blood, blood components, plasma derivatives, cells & tissues and ATMPs will be updated. The CC will keep contact with Working Groups on “Revision of PIC/S Guidance for Blood” and on the “Aide Memoire on Tissues and Cellular Therapy Products Inspections” for promoting the harmonization of the PIC/S guidance documents with those of WHO on blood and with the EU Commission upcoming regulation (foreseen in August 2024).

* in co-operation with the EU Commission Expert Sub-Group on Inspections in the Blood, Tissues and Cells Sectors (IES)

15. The Expert Circle on Quality Risk Management (QRM) met in November/December 2022 in São Paulo (Brazil) and a next meeting is not planned yet for 2023. The Expert Circle will continue to work on revising the PIC/S Aide Memoire on QRM, in parallel with the revision of ICH Q9 (R1), which reached step 4 of the ICH process in January 2023. The pilot e-learning module on QRM for PIA, which it successfully developed in 2022, will also be updated accordingly.

16. The Expert Circle on Good Distribution Practice (GDP) will organise virtually in Q4 2023 the 6th PIC/S Expert Circle Meeting on GDP which will be hosted by Hong Kong SAR / PPBHK. This Expert Circle plans to continue to co-operate with the Working Group on Veterinary Medicinal Product (VMP) on GDP for VMP and GDP for API used as starting materials in VMP. It also plans to discuss concept papers on GDP-specific issues, which could result in new guidance documents.

17. The Expert Circle on Controlling Cross Contamination in Shared Facilities (CCCISF) will present a revised mandate to the Committee.

18. The two new Expert Circles established in 2022 on Clinical Practices (GCP) and one on Good Pharmacovigilance Practices (GVP) plan to start their activities in 2023 and finalise their respective organisational structure. Both Expert Circles will co-operate and dedicated Working Groups will be established under each. With regard to the Expert Circle on GCP, a Working Group on ICH M10 (Bioanalytical Method Validation and Study Sample Analysis), a Working Group on GCP Computerised Systems and a Working Group dedicated to the operation of the PIC/S Joint Visit Programme for GCP will be established. With regard to the Expert Circle on GVP, a Working Group on Artificial Intelligence and Machine Learning and a Working Group dedicated to the operation of the PIC/S Joint Visits Programme for GVP will be established. Meetings of these new Expert Circles are not yet planned.

19. The Expert Circle on Active Pharmaceutical Ingredients (API) will need to be re-activated and a new Chair elected by the Co-ordinating Committee. The finalisation of the development of an API Curriculum for PIA will then be a priority. A next meeting is not planned to take place in 2023.

20. The Working Group on Veterinary Medicinal Product (VMP) will mainly work on the revision of Annexes 4 & 5 of the EU-PIC/S GMP Guide as well as veterinary specific guidance documents (GMP for Autogenous vaccines and GMP for novel therapies), see paragraphs 32-34; and co-operate with the Expert Circle on Good Distribution Practice (GDP), see paragraph 16.

21. The Working Group on the revision of PI 011-3 (Computerised Systems) is still on hold, subject to the revision of Chapter 4 & Annex 11 of the EU-PIC/S GMP Guide. The revision process of Annex 11 has started with the development of a concept paper by a dedicated EMA Drafting Group, in which PIC/S is represented by the Chair of the PIC/S Working Group on the revision of PI 011, and for which a joint PIC/S-EMA public consultation took place between 16 November 2022 and 16 January 2023.

22. Subject to the availability of human resources, the Joint Visits Programme (JVP) will be restarted and a new Expert Circle on Artificial Intelligence will be considered. Several Expert Circles including GCP, GVP and Human Blood, Tissues, Cells and ATMPs will assist in setting-up new groups in their respective fields. Opportunities for joint training events with Partner Organisations (in particular EC, EMA and WHO with regard to a joint training plan on revised Annex 1); with PIC/S Participating Authorities with regard to their own training initiatives; and with other organisations will continue to be further explored.

HARMONISATION OF GM(D)P

23. The Sub-Committee on GM(D)P Harmonisation (SCH) is mandated, amongst other matters, to (i) harmonise GM(D)P and establish best inspection practices; and (ii) to ensure the harmonisation and the equivalence of the PIC/S GMP Guide with the EU GMP Guide in close co-operation with the EMA's Inspectors Working Group (IWG) on GMDP.

24. PIC/S normally participates through experts in IWG Drafting Groups in line with the EMA-PIC/S Joint Consultation Procedure. In 2023, the following revisions will be continued:

GMP Guide	Topic
Chap 1	Pharmaceutical Quality System
Chap 4 & Annex 11	Documentation & Computerised Systems
Annexes 4 & 5	Veterinary medicinal products (VMP) and biologicals

25. Following proposals by the EMA IWG on GMDP to jointly review Annex 6 (medicinal gases) and Annex 15 (Qualification & Validation (to cover APIs)) of the EU-PIC/S GMP Guide, PIC/S will also participate in the review processes.

26. The SCH will continue to monitor EU Annex 21 (importation of medicinal products) through the participation of Swissmedic in the Drafting Group. Once finalised, the Committee, based on a recommendation of the SCH, will need to decide whether to adapt this Annex for PIC/S purpose.

27. The harmonisation of GM(D)P is done through the development or revision of PIC/S GMDP-related guidance documents under the leadership of the SCH. For the table summarising the status of PIC/S guidance documents, see paragraph 43.

28. In 2023, the SCH's work priorities will be the implementation of the revised Annex 1 (sterile manufacturing) and Annex 2A (ATMP); the revision of Annexes 4 & 5 (veterinary medicinal products); the revision and development of guidance documents on human blood, tissues and cells; and the revision of the PIC/S Inspection Report Format, as detailed below.

<u>Sterile Manufacturing</u>

29. Following the successful adoption and publication of the revised Annex 1 on Annex 1 – Manufacture of Sterile Products, the joint PIC/S-EMA Working Group will work on preparing training material for inspectors focusing on the main differences introduced by the revision. This will enable inspectors to have a good understanding of the new requirements of Annex 1, once the latter enters into force. For this specific work, the Working Group will report to the SCT (see paragraph 12), which will closely co-operate with the EC and EMA. The mandate of the Working Group will have to be revised.

30. In parallel, the following PIC/S recommendations related to Annex 1 will be revised [by the same Working Group / a different Working Group] under the supervision of the SCH and in close co-operation with the EMA IWG on GMDP:

- Interpretation of most important changes for the manufacture of sterile medicinal products (PI 032-2) – to be possibly withdrawn;
- Recommendation on sterility testing (PI 012-3);
- Isolators used for aseptic processing and sterility testing (PI 014-2); and

- PIC/S Validation of Aseptic Processing) 2011 (PI 007-6).

31. Once the above has been achieved, the possibility of turning the Working Group on Annex 1 into an Expert Circle on Sterile Products under the responsibility of the SCEC will be considered.

Veterinary Medicinal Product (VMP)

32. Following the publication of the concept papers on veterinary specific GMP guidelines, the PIC/S Working Group on Veterinary Medicinal Product (VMP), which has merged with the EMA Drafting Group, will work on the revision of Annex 4 (Manufacture of Veterinary Medicinal Products other than Immunological Veterinary Medicinal Products) and Annex 5 (Manufacture of Immunological Veterinary Medicinal Products). A first draft may be shared with PIC/S PAs in the course of 2023.

33. Time permitting, the Working Group also plans developing new veterinary specific guidance in co-operation with EMA (cf. EMA GMDP IWG work plan 2021-2023):

- GMP for Veterinary ATMPs;
- GMP for Autogenous Veterinary Vaccines;
- GDP for API use as starting material for VMP*;
- GDP for VMP*.

* Already in force in the EU / to be transposed for PIC/S purpose

34. Taking in account the recent VICH initiative on mirroring ICH Q7 in a VICH guideline on GMP for the manufacturing of APIs for medicines for veterinary use, the WG on VMP will continue to follow the work done by the existing VICH Quality Expert Working Group that will be responsible for developing this guideline. The goal will be to observe and, if possible, influence discussions in order to contribute to a better international harmonisation for the manufacturing of APIs for medicines for veterinary use.

Human Blood, Tissues, Cells & ATMP

35. The Working Group on Revision to Blood Guidance Documents will revise the PIC/S Site Master File for Source Plasma Establishments (PI 019) and PIC/S Site Master File for Plasma Warehouses (PI 020).

36. The Working Group on Aide Memoire on Tissues and Cellular Therapy Products Inspection will develop the inspection Aide Memoire for this product class.

37. The Working Group on Annex 2, in co-operation with Austria / AGES and the Expert Circle on Human Blood, Tissues, Cells & ATMP, will organise a virtual training on PIC/S Annex 2A (Manufacture of advanced therapy medicinal products for human use). The webinar will take place on 14-16 March 2023, back-to-back with a virtual meeting of the PIC/S Expert Circle on Blood, Tissues, Cells and ATMPs. See paragraph 14.

PIC/S Inspection Report

38. As a priority for 2023, the SCH will initiate a partial revision of the PIC/S Inspection Report Format (PI 013-3) in order to harmonise it with the PIC/S Recommendation on the Classification of Deficiencies (PI 040-1) and the EU Inspection Report Format in order to include the inspectors' comments on (i) the manufacturer's response to the inspection findings and (ii) questions/issues raised in the assessment report. A reference to Unique Facility Identifier (UFI) should also be included.

Annexes 6 & 15 of GMP Guide

Other GMP Guidance Documents

39. The Working Group on Data Integrity should reconvene to discuss whether to finalise PI 050 “Aide Memoire on PIC/S Data Integrity System-Specific Guidance: Chromeleon 7 Chromatography Data Systems and Server/Client Systems”.

40. The Working Group on Controlling Cross-Contamination in Shared Facilities will continue with the update and revision of the PIC/S Aide Memoire on Controlling Cross-Contamination in Shared Facilities (PI 043).

41. The SCH will discuss how to proceed with a previously agreed ‘focused stakeholder consultation’ (Step 2) for the revised version of PI 006-3 “Recommendations on Qualification and Validation”, developed by the Working Group on PI 006-3, whose chairmanship is currently vacant (following the departure of Norman Gray, MHRA).

42. The Sub-Committee will also follow up on some outstanding work, in particular:

- the project on the PIC/S Library; and
- the proposed survey to measure the use/implementation of PIC/S guidance documents (whether they are used and useful), which has been developed by the SC COM (see paragraph 56).

43. For the status of PIC/S GMDP-related guidance documents under revision or development, see table below:

Reference	Topic	SC
PI 019 PI 020	PIC/S Site Master File for Source Plasma Establishments (PI 019); PIC/S Site Master File for Plasma Warehouses (PI 020).	SCH
PE 010-4	PIC/S Guide to Good Practices for the Preparation of Medicinal Products in Healthcare Establishments (to add annex on guidance on Total Parenteral Nutrition (TPN))	SCH
PI 006-3	Revision of PIC/S Recommendations on Validation Master Plan; Installation and Operational Qualification; Non-Sterile Process Validation; and Cleaning Validation	SCH
PI 007	Recommendation on Validation of Aseptic Processes	SCH
PI 011	PIC/S Guidance on Good Practices for Computerised Systems in Regulated GxP Environments	SCEC
PI 013	PIC/S Inspection Report	SCH
PI 023-2	Aide Memoire on Inspection of Quality Control Laboratories	SCH
PI 025	Aide Memoire on Medicinal Gases	SCH
PI 030-1	Aide-Memoire on the Inspection of APIs [#]	SCH
PI 043-2	PIC/S Aide Memoire on Controlling Cross-Contamination in Shared Facilities	SCH
PI 050	Aide Memoire on PIC/S Data Integrity System-Specific Guidance: Chromeleon 7 Chromatography Data Systems and Server/Client Systems	SCH

44. The SCH will also discuss one of the goals established under the PIC/S Strategic Plan 2023-27 (PS/W 15/2022), which is to *“ensure that GxP standard guidance is not an obstacle*

[#] The role of the SCH will be for collaborative support once a draft is available.

to the development of new technologies providing new possibilities of treatment to patients." In this regard, the SCH should determine how to achieve two related objectives, which are:

- *'To lead and harmonise the development of GMP requirements & guidance documents on new technologies / novel approaches' and*
- *'To monitor and respond to developments in emerging fields such as ATMP, biotechnology, and artificial intelligence'.*

STRATEGIC DEVELOPMENT AND CO-OPERATION

45. The Sub-Committee on Strategic Development (SCSD) will continue to monitor the activities of the five Working Groups, operating under the SCSD, which are:

- Working Group on Unique Facility Identifiers (UFI);
- Working Group on Remote Assessment;
- Working Group on Inspector Travel Safety;
- Working Group on Confidential Informants;
- Working Group on Inspection Reliance.

46. In line with a decision of the PIC/S Committee, taken in Dublin (Ireland) on 3 October 2022, a new Working Group on preparing the Revision of the Inspection Report Format in line with PIC/S' involvement in the ICMRA Joint Reflection Paper on Pharmaceutical Quality Knowledge Management System' (PQ-KMS) will be established in 2023 under the SCSD.

47. The Working Group on UFI will work on the implementation of its proposal, endorsed by the PIC/S Committee, which is for PIC/S Participating Authorities to collect, verify and use WGS84 geographic coordinates (geocodes) in a specific format in order to aide in the identification of global pharmaceutical manufacturing facilities, for both national and third country inspections. The WG on UFI will gather information on the proposed implementation through a survey.

48. The Working Group on Remote Assessment, established in October 2021, will work on harmonising the terminology on remote assessment, inspector's qualifications, and best practices on remote assessment. A first draft of the PIC/S Guidance on Remote Assessment and the related Aide-Memoire will be shared with the SCSD in the course of 2023.

49. The Working Group on Inspection Reliance has been established in order to identify barriers that prevent PAs to rely on already existing inspection reports, based on the PIC/S Inspection Reliance Initiative (see PIC/S Guidance on GMP Inspection Reliance: PI 048-1). In 2022, the Working Group launched a survey, addressed to all PAs, in order to get a better understanding on the inspection reliance framework, established by each PA, and the existence of potential barriers preventing a PA to share GMP information within the PIC/S network. In 2023, the Working Group will assess and discuss the output of the survey and then report back on its findings to the SCSC. In relation with inspection reliance, the SCSD will also discuss the possibility of sharing lists of domestic and foreign inspections with non-PIC/S Regulatory Authorities, subject to third-party funding.

50. The Working Group on Inspector Travel Safety will elect a new Chair, who has been proposed by US FDA, and then resumes its activities.

51. The Working Group on Confidential Informants, which has been dormant since the outbreak of the pandemic in 2020, will be reactivated, provided that PAs provide the necessary human resources.

52. Co-operation with Partner Organisations (EC, EMA, EDQM, UNICEF, WHO and WOAH) will be further pursued and improved interaction considered in order to avoid the duplication of activities, notably in the field of GMDP training and the drafting of guidance documents.

53. Possibilities to co-operate with other organisations will be further explored, in particular with the International Coalition of Medicines Regulatory Authorities (ICMRA), notably through PIC/S' participation in the ICMRA project on PQ-KMS, and the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH).

54. The SCSD will review the classification of PIC/S documents and further discuss the launching of a voluntary pilot on compliance management related to the sharing of information regarding borderline compliance, i.e. cases, where a GMP certificate has been issued but the manufacturer does not fully comply with GMP.

55. Relations with selected Non-Members, having expressed an interest to join PIC/S, will be fostered. Establishing a good working relationship is essential for Competent Medicines Regulatory Authorities to apply for PIC/S membership.

COMMUNICATION AND FINANCES

56. The general objective of the Sub-Committee on Communication (SC COM) will be to improve communication, both internally and externally, notably on social media. In this perspective, resourcing will be increased for the management of external communication of PIC/S. Efforts will be undertaken to strengthen PIC/S communications and engagement with regard to partnerships and stakeholders, while seeking new opportunities for communication strategies and engagement through social media (in particular professional networks) and the PIC/S website (regular newsletters). These new communication and information channels aim to benefit the entire PIC/S community. Efforts will also focus on supporting greater communication and information sharing among PIC/S Participating Authorities to reinforce inspection reliance, notably through the PIC/S List of Planned Foreign Inspections, and ways to enhance its use. As a consequence of the COVID-19 pandemic, during which the list was put on hold, there is an increased interest by all agencies and organisations to share information on foreign inspections. Tools to measure the utilisation and implementation of PIC/S guidance documents will also be finalised and implemented.

57. The goals of the Sub-Committee on Budget, Audit & Risk (SCB) for 2023 are:

(i) to discuss and propose a possible increase of PIC/S' income by considering (i) a proposal for a tiered membership fee system; and (ii) a proposal on the possible indexation of the annual fees to inflation;

(ii) to review the 2022 PIC/S financial accounts, the related financial report by the External Auditor; and activity-specific financial reports (mainly for the Precious Metals Convention, PMC, and the PIC/S Inspectorates' Academy, PIA);

(iii) to monitor the 2023 PIC/S finances;

(iv) to prepare two separate budgets for 2024: one for PIC/S and one for PIA; and

(v) to review the multiannual PIC/S and PIA budget plans

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