



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

EMA regulatory update

Brexit, safety features regulation and GMP

Indian Pharmaceutical Forum, Mumbai, 28 February 2019

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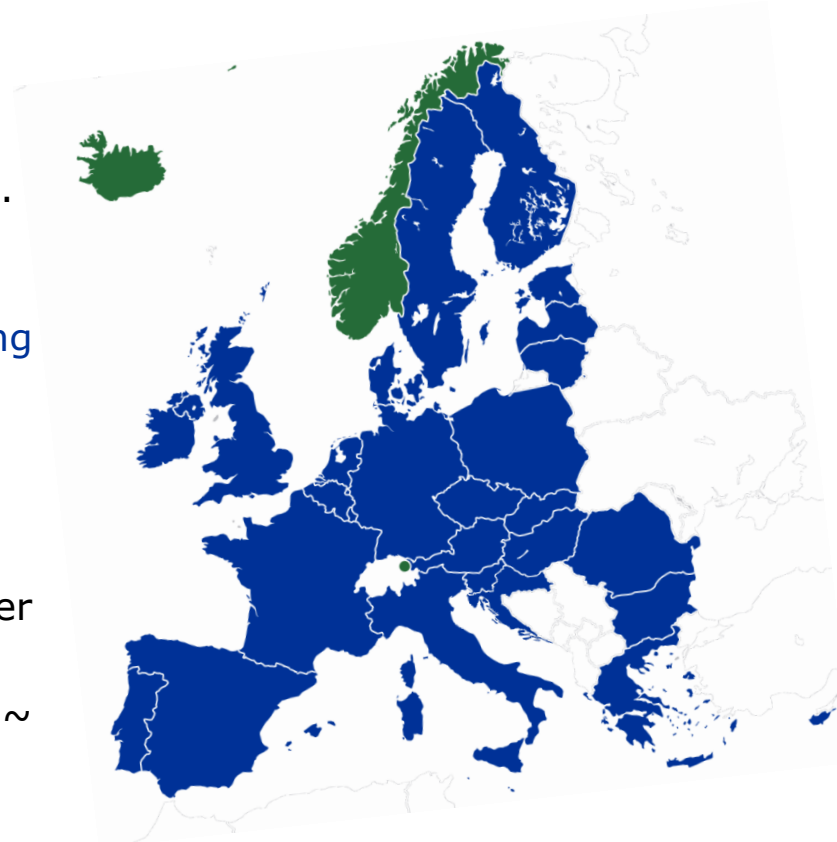
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Overview of the EMA

- The European Medicines Agency (EMA) is a decentralised agency of the European Union (EU).
- EMA is responsible for the **scientific evaluation, supervision and safety monitoring of medicines** in the EU.
- EMA is a **networking organisation** whose activities involve thousands of experts from across Europe.
 - 28 EU Member States + 3 EEA* Member States (~ 5 million citizens);
 - ≈ 50 National Regulatory Authorities ; ~ 4,500 European experts.



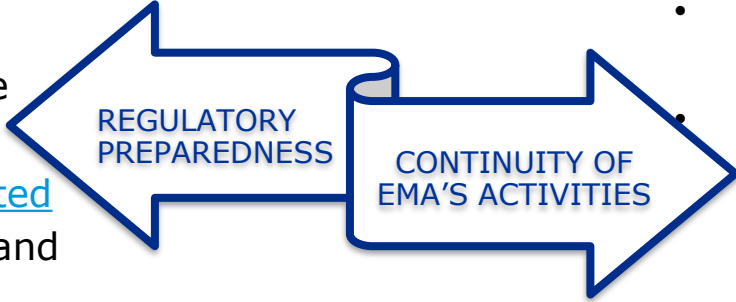
*European Economic Area



Brexit update

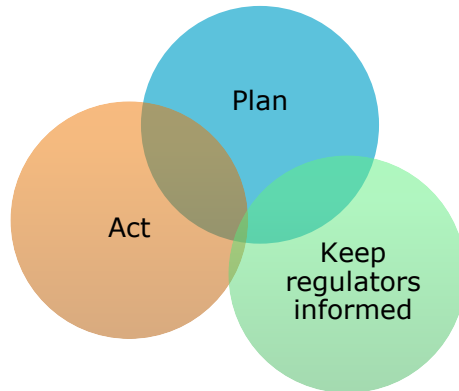
- On 29 March 2017, the United Kingdom (UK) notified the European Council of its intention to withdraw from the EU.
 - The EMA, European Commission (EC) and National Competent Authorities (NCAs) have been working in order to ensure that after the UK leaves the EU:
 - EMA, EC, NCAs can continue to deliver on their mission and **protect public and animal health**.
 - companies are ready to take the necessary steps to enable **undisrupted supply** of their medicines in the EU.
- Working on the assumption of a “no deal scenario” with the UK becoming a third country as of 30 March 2019 (“withdrawal date”).
 - Working following the application of the EU legislation.
 - No Member State has previously decided to leave the EU, so there is no precedent for this situation.

Brexit update

- EMA/EC is actively engaging with stakeholders advising to **plan** and take any required **regulatory step**.
 - Several stakeholders meetings organised since 2017.
 - Publication of [Brexit related guidance for companies](#) and [Q&A](#).
 - Business continuity plan developed to ensure operational continuity.
 - Knowledge transfer subsequent to staff loss.
 - EMA physical relocation to Amsterdam (The Netherlands).
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Brexit update

- The Pharmaceutical industry has primary responsibility for ensuring **quality** and **continuity of supply** of medicines.
- EMA and the EC and NCAs will continue providing guidance to help pharmaceutical companies responsible for both human and veterinary medicines prepare for the UK's withdrawal from the EU.



Brexit update: ensure regulatory preparedness



26. Who will take over supervision of the manufacturing sites of medicinal products in third countries previously supervised by UK authorities and when will the next GMP inspection be conducted?

- For medicinal products imported from third countries the supervisory authorities shall be the competent authorities of the Member State or Member States that granted the authorisation to the importer of the concerned medicinal product.
 - As of the withdrawal date, UK authorities will no longer undertake the role of a supervisory authority. The [new Union supervisory authority](#) responsible for supervision of manufacturing sites located in UK and third country sites previously inspected by UK will decide, using a [risk-based approach](#), when an inspection of the site(s) concerned will be required, in order to confirm or re-confirm GMP compliance.

Brexit update: ensure regulatory preparedness

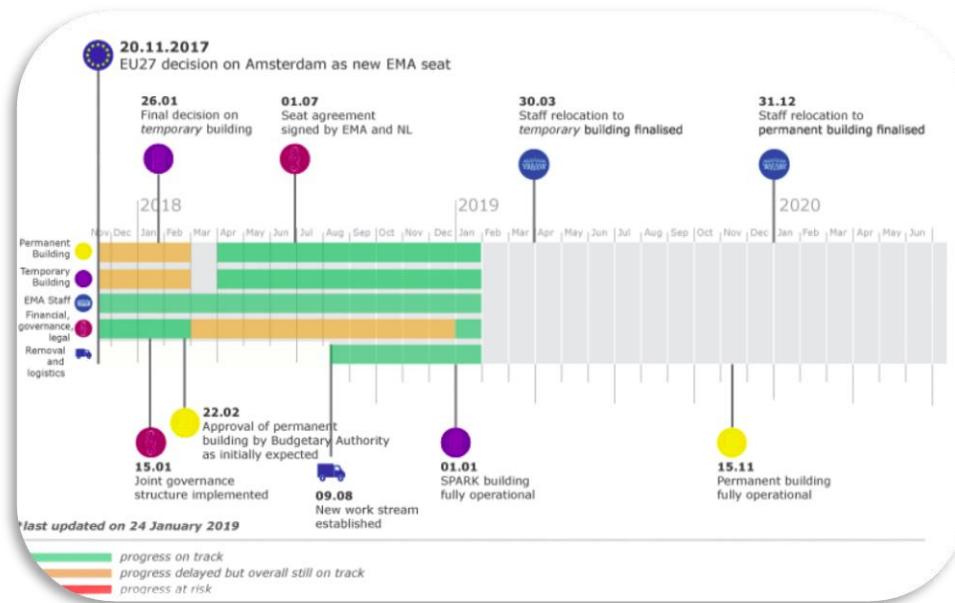


27. Can I continue to use after 29 March 2019 a manufacturing site for which the Union GMP certificate has been issued by UK authorities?

- Union legislation does not require a Union GMP however in practice GMP certificates issued by the Union competent authorities are used to confirm the Union GMP compliance.
- GMP compliance of manufacturing sites in third countries may also be confirmed through other means, based on a risk-based approach (e.g. based on information on GMP compliance from third country regulatory authorities).
 - GMP certificates issued by the UK competent authority before 30 March 2019 should therefore be considered as such **information on GMP compliance from the third country regulatory authority**.

Brexit update: ensure continuity of EMA's activities

- EMA will leave its premises in London on 1 March 2019.
- From 4 to 8 March a small number of **core staff** will be present in temporary **Spark** building in Amsterdam.
- EMA staff relocation to the permanent building in Amsterdam is expected to be finalised by 2020.



Safety features regulation

4 pillars of the Falsified Medicines Directive (FMD)

1. Safety features

Mandatory identification and authentication of individual medicine packs.

4. Internet sales

A common, EU-wide logo to identify legal online pharmacies.



2. Supply chain

Strengthened Good Distribution Practices

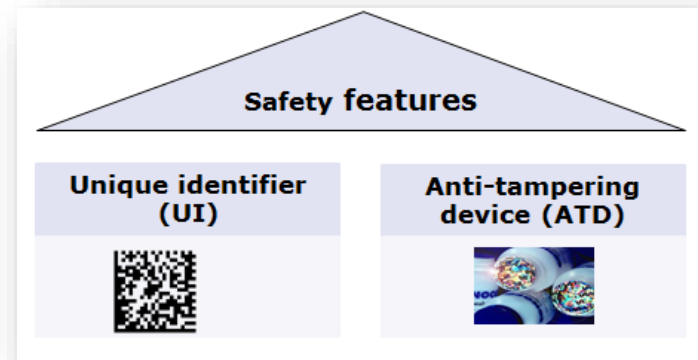
3. Active substances

Tougher rules on importation of APIs; reinforced controls and inspections of API manufacturers.

Safety features regulation

From the 9th of February 2019 the presence of the safety features is mandatory in the EU.

- The Regulation requires that medicinal products carrying EU safety features **do not have any other visible 2D barcode** on their packaging → medicinal products exported from third countries to the EU should only bear **one unique identifier that complies with the specifications of EU legislation**.
- [Q&A](#) on safety features.



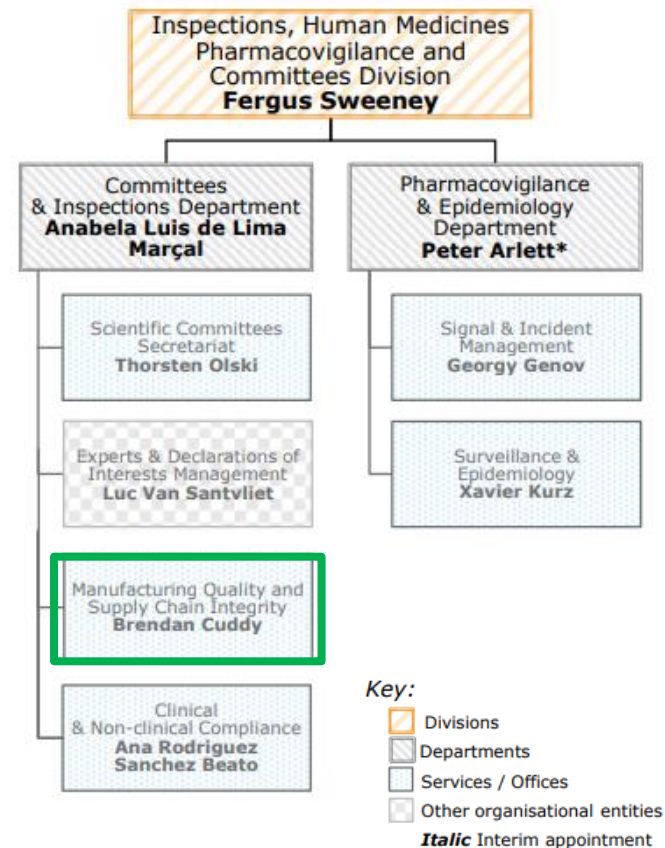
- EMA published a [new reporting form](#) to be used by pharmaceutical companies when [notifying EMA of any suspected falsification](#) of their centrally authorised medicines.

GMP update

Manufacturing Quality and Supply Chain Integrity

This is a “service” of the Inspections, Human Medicines Pharmacovigilance & Committees Division.

- Market surveillance (e.g. [quality defects and recalls](#), [market disruptions](#), [EMA/EDQM sampling and testing programme](#)).
- [GMP inspection coordination](#) and procedural support.
- Meeting support (e.g. [GMDP Inspectors Working Group](#), [Mutual Recognition Agreements](#)).
- [Parallel distribution](#).
- [Certificates](#) (behalf of the EC to confirm the marketing authorisation status).





GMP update

GMDP Inspectors Working Group main activities

GMP guidance

- Drafting/revising GMP-related guidance.
- Evaluates how new legislation impacts GMP inspection activity and harmonisation of GMP inspections.
- Update of [Compilation of community procedures on inspection and exchange of information](#).

MRAs

- Supports activities related to MRAs.

Other topics

- Discuss GMP related issues concerning centrally authorised products and GMP inspections co-ordinated by the EMA.
- Supports collaboration initiatives with other regulators (e.g. capacity building and training on EU GMP standards).
- Oversee the [EudraGMDP](#) database.



GMP update

Published guidelines and Q&As:

- [Part IV: Detailed Guidelines on GMP for Advanced Therapy Medicinal Products \(ATMPs\)](#) – Entered into application in May 2018.
- [Q&A on implementation of risk-based prevention of cross-contamination in production and 'Guideline on setting health-based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities'](#) – Published in April 2018
- [Annex 17: Real Time Release Testing and Parametric Release](#) – Entered into application on the 26/12/2018.

GMP update

Annex 1 Manufacture of Sterile Medicinal Product

- Public consultation with stakeholders in 2018: approximately 6200 individual comments received.
- Introduction of **new technologies and procedures** (e.g. barrier technologies).
- Introduction of new sections and new restructure developed in close collaboration with WHO and PIC/S.
- Draft expected to be ready by 2019.

Annex 21 GMP for importers of medicinal products

- Draft ongoing.
- Public consultation planned.



Conclusions

- The Pharmaceutical industry has primary responsibility for ensuring **quality** and **continuity of supply** of medicines.
 - ✓ Ensure compliance with regulation.
 - ✓ Keep updated with the latest guidance (invest on continuous **training**).
 - ✓ **Plan** in advance.
 - ✓ Keep open dialogue with the regulators, especially during challenging periods!
- The EMA, EC and NCAs will continue providing guidance to help pharmaceutical companies.





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Thank you for your attention

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