



Australian Government

Department of Health

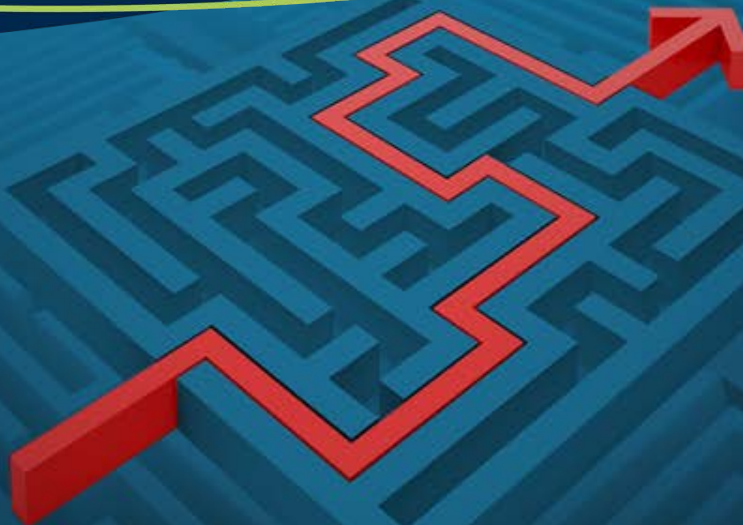
Therapeutic Goods Administration

SME Assist – ‘Meeting Your Obligations’

Manufacturing

Melanie Leake
SME Assist

6 December 2019



TGA Health Safety
Regulation



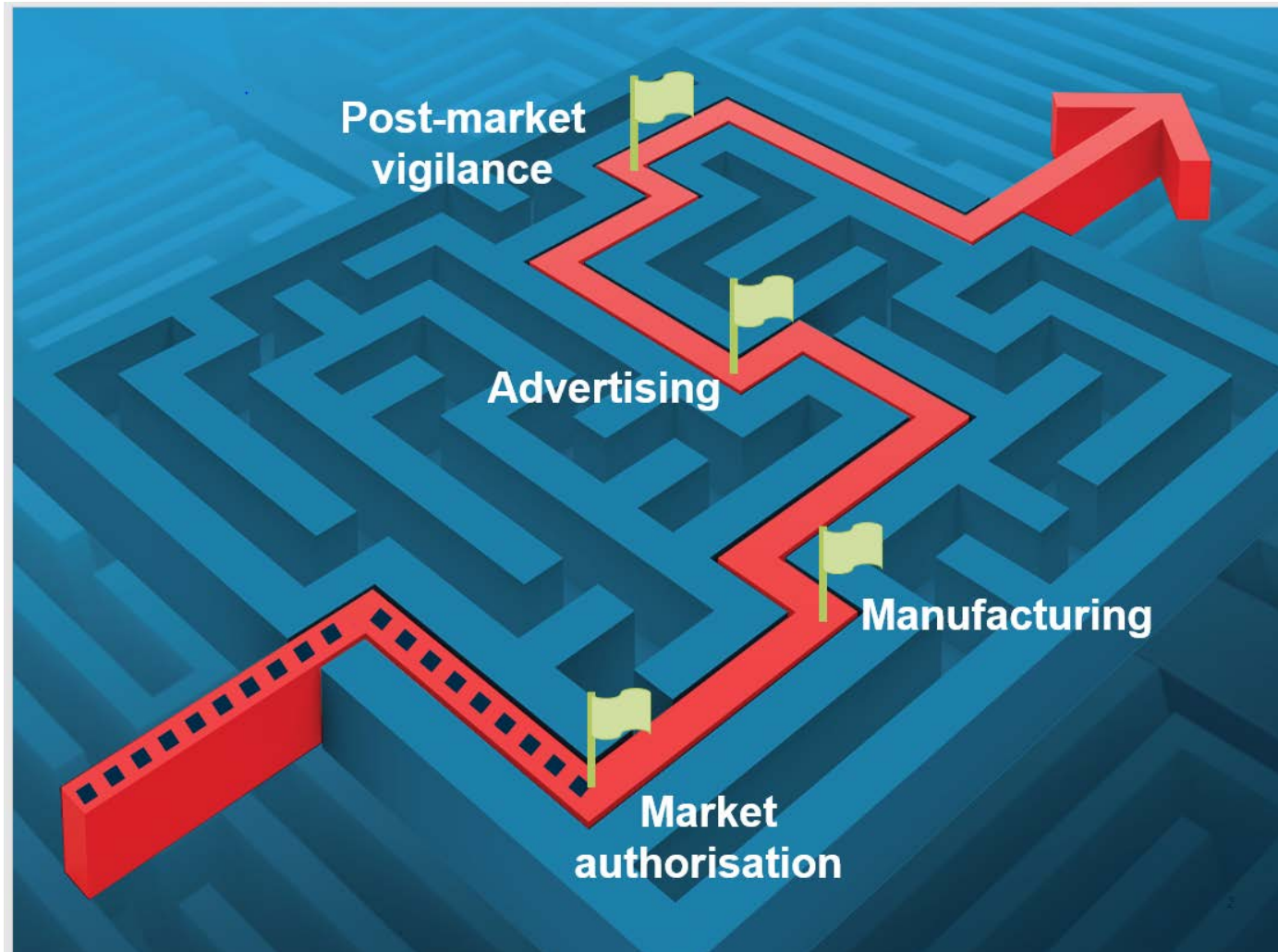
Disclaimer

This material is provided to you solely for the purpose of providing a record of today's presentation.

The presentation is not legislative in nature and should not be taken to be statements of any law or policy in any way.

The Australian Government Department of Health (of which the TGA is a part) advises that:

- a) the presentation paper should not be relied upon in any way as representing a comprehensive description of regulatory requirements, and
- b) it cannot guarantee, and assumes no legal liability or responsibility for, the accuracy, currency or completeness of the information contained in the presentation paper.





Manufacturing



Medicines and biologicals



Medical devices



All therapeutic goods



Manufacture

- Any stage involving the production of the therapeutic good
- This can include:
 - producing
 - processing
 - refurbishing
 - assembling
 - packaging
 - labelling
 - testing
 - release for supply





Manufacturing



Assessment

Good manufacturing practice (GMP)

Conformity assessment



PIC/S Guide to GMP

Essential Principles

or

Australian Code of GMP for human blood and blood components, human tissues and human cellular therapy products





Manufacturing

Manufacturer evidence



Australian manufacturer:

⇒ **manufacturer** needs to obtain GMP licence and forward onto sponsor

Overseas manufacturer:

⇒ **sponsor** needs to obtain GMP clearance for their manufacturer

Market authorisation application

Include manufacturer evidence

Certificate or declaration of conformity

Submit manufacturer evidence **first**

Then submit market authorisation application





Manufacturing

International agreements and arrangements



Mutual recognition agreements (MRA)

There is a list of countries and their regulatory bodies that have an MRA or equivalent arrangement with Australia.

These include:

- United States
- Canada
- Singapore
- United Kingdom

Comparable overseas regulators (CORs)

These currently include:

- European notified bodies
- United States of America
- Canada
- Japan
- Certificates and reports issued under the Medical Device Single Audit Program





Manufacturing

Inspections



Can happen at any time during the market authorisation process (pre-market, processing, post-market)





CASE STUDY: Susie's GMP Clearance





- ✓ Regulated as a medicine in Portugal
- ✓ Manufacturer recently inspected
- ✓ GMP certificate





Susie uses the GMP clearance application assistance tool

GMP Clearance Application Assistance Tool

Before using this tool and submitting a GMP clearance application, you are encouraged to familiarise yourself with the:

- [GMP clearance guidance](#)
- [Sponsor responsibilities related to GMP clearance and certification](#)
- [International agreements and arrangement for GMP clearance](#)

If you require assistance navigating the tool or understanding your outcome, you may wish to [contact the Manufacturing Quality Branch](#) or consider engaging a [regulatory affairs consultant](#).

Actions relating to a GMP clearance

There are different evidence requirements depending on whether you want to

1. Obtain a new clearance
2. Vary an existing clearance (renew, change scope, change manufacturer details or applicant/sponsor details)
3. Transfer a GMP clearance

When you update an existing GMP clearance by submitting a variation application, this will allow you to keep the original GMP clearance number and avoid the need to update your ARTG entries. Where there has been a transfer of product sponsorship, **transferring GMP clearances** to the new sponsor will ensure continuity of the product listing or registration.

What would you like to do in relation to a GMP clearance?

- › [Obtain a new GMP clearance for an overseas manufacturing site](#)
- › [Renew an existing GMP clearance](#)





GMP clearance is usually issued for manufacturers of:



- non-sterile Active Pharmaceutical Ingredients (APIs)
 - e.g. APIs manufactured by chemical synthesis or ‘classical’ fermentation
- non-sterile finished products
 - e.g. tablets or oral liquids
- sterile or biotech APIs
 - e.g. APIs manufactured by biotechnology fermentation/cell culture, or APIs that are sterilised
- sterile or biotech finished products
 - e.g. injections, lyophilisates or recombinant products
- contract testing laboratories or contract sterilisers



Three possible options for GMP clearance

1) GMP clearance
through a mutual
recognition agreement
(MRA) desktop
assessment

Use this if:

- the manufacturing site is located within the borders of an MRA country **and**
- the site has been inspected by that country's regulatory authority

2) GMP clearance
through a compliance
verification (CV)
desktop assessment

Use this if:

- the manufacturer does not meet the criteria for MRA **and**
- the site has been inspected by a regulatory authority that has an agreement or arrangement with TGA

3) GMP certification
via a TGA on-site
inspection

Use this if:

- MRA and CV pathways are not applicable **or**
- no acceptable evidence from a recognised regulatory authority is currently available
(e.g. for products that are not considered medicines in the country of manufacture)



Notes about the MRA pathway

- The overseas regulator must meet TGA standards for GMP codes
- The overseas regulator must have recently inspected the manufacturing site to TGA standards
- Evidence must be current, accurate and complete, and translated to English if necessary





Susie submits her GMP clearance application through TGA Business Services (TBS)

- She logs into TBS and selects **Clearance Application**
- She provides the required details, including:
 - Client details
 - Product details
 - Evidence
- She pays the associated fees, agrees to the declaration and submits her application





SME Assist

The screenshot shows the TGA website interface. At the top left is the Australian Government logo and the text 'Australian Government Department of Health Therapeutic Goods Administration'. A search bar labeled 'Search TGA' is on the top right. A navigation menu includes 'Home', 'Safety information', 'Consumers', 'Health professionals', 'Industry', 'About the TGA', and 'News room'. The main content area features a 'TGA Topics' section with a night sky image and a 'Find out more »' link. Below this are three columns: 'Consumers' with links for 'Personal importation', 'For travellers', and 'Buying online'; 'Health Professionals' with links for 'Reporting problems', 'Unapproved products', and 'Special access scheme'; and 'Industry' with links for 'SME Assist', 'Regulation basics', and 'Scheduling basics'. The 'SME Assist' link is circled in green. A 'Recalls and suspensions' section lists recent events like 'Sartan' blood pressure medicines and Jurnista. On the right sidebar, there are sections for 'I want to ...' (Report a problem, Ask a question, etc.), 'Popular' (Access to medicinal cannabis products, etc.), and 'Search databases' (Australian Register of Therapeutic Goods (ARTG), etc.).



SME Assist

www.tga.gov.au/sme-assist

1800 020 653

sme.assist@tga.gov.au



Australian Government

Department of Health
Therapeutic Goods Administration