Australian Government
Department of Health
Therapeutic Goods Administration

This year's highlights and what's ahead for 2017

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Parenteral Drug Association end of year event

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TGA Health Safety Regulation

Overview

- Close out process
- Product/process risk matrix changes
- Reinspection frequencies changes
- Common deficiencies from sterile manufacture inspections for 2015 and 2016 (to date)
- What's ahead

Close out process

There is a new close out process

- Issue post inspection letter
- Responses received on a close out template
- Objective evidence requested only under certain situations, e.g. initial, recurring issues

Close out process

- Final inspection report written once the inspection is closed out
- Addition of time at the next inspection for A2 and A3 manufacturers to review the evidence from the CAPA Plan

Risk Based Inspection

We have made changes to:

- product / process risk matrix
- reinspection frequencies

for medicines and blood, tissue and cellular therapies

Drivers for change

TGA's purpose

Health
Safety
Regulation

To safeguard and enhance the health of the Australian community through the effective and timely regulation of therapeutic goods.

Regulator performance framework

KPI 3 - Actions undertaken by regulators are proportionate to the regulatory risk being managed

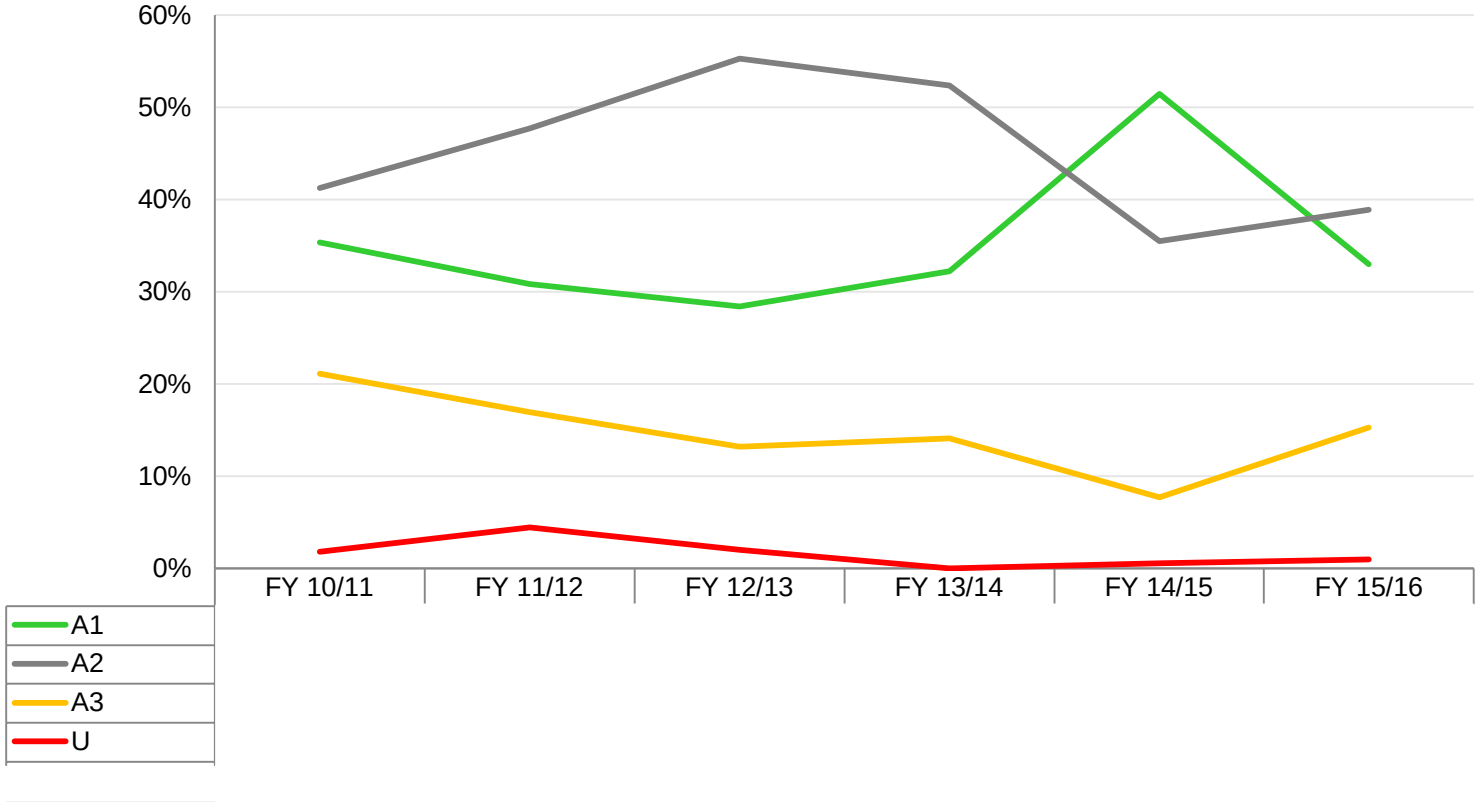
"*Efficient regulatory risk assessment takes account of the regulated activity, the nature of the regulated cohort, including its* ***compliance history****, and other external factors affecting risk*."

Understanding manufacturer compliance risk

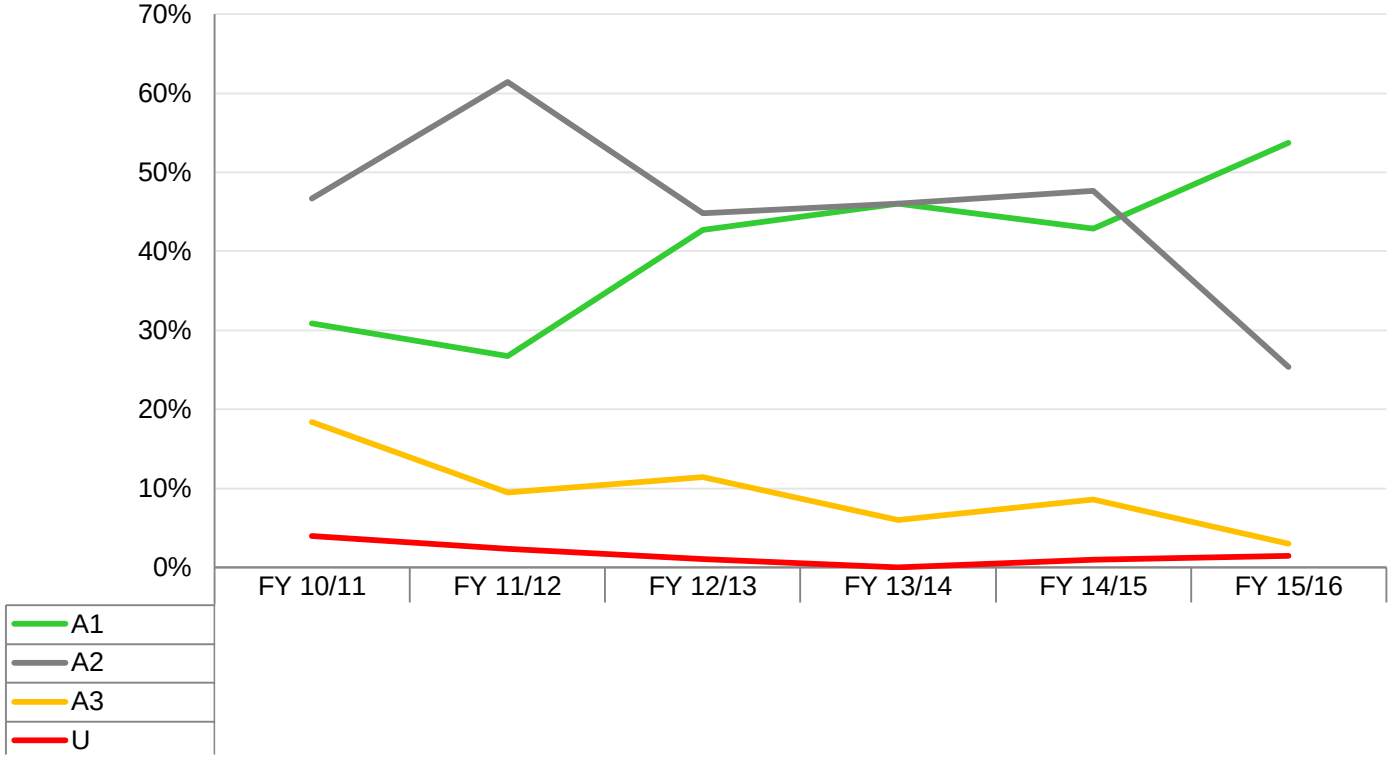
Understanding compliance attitudes

Voluntary compliance	Accidental non-compliance	Opportunistic non-compliance	Intentional non-compliance
• Effective compliance systems • Management is compliance oriented	• Ineffective and/or developing compliance systems • Management is compliance oriented but lacks capability	• Resistance to compliance • Limited or poor compliance systems • Management not compliance oriented	• Deliberate non-compliance • No compliance systems • Criminal intent
Committed to doing the right thing	*Trying to do the right thing but don't always succeed*	*Don't want to comply but will if made to*	*Decision to not comply*

Domestic inspection outcomes



Overseas inspection outcomes



Understanding intrinsic product/process risks

Revised product/process risk matrix

Product /process Risk	Medical Product Description	BTCT Product Description
High	Sterile medicines, single step sterilisers, sterile APIs to be used in aseptic conditions, biotechnology APIs	Primary collection, processing and storage sites for blood, including human haematopoietic stem cells (HPCs), tissue banks and complex processing, cellular therapies
Medium	Other sterile APIs used with terminal sterilisation step, registered non-sterile medicines (including registered herbal medicines)	Secondary blood collection and separation sites (including apheresis), tissues banks with low manipulation
Low	Non-sterile APIs for registered medicines ,all listed medicines (including listed herbal medicines), sunscreens, medicinal gases, single step – labelling/packaging; release for supply, storage	Other (not primary or secondary) blood collection sites, including mobile units
Other	All remaining non-sterile APIs, homoeopathic products	N/A

Managing manufacturing quality risks

"*Where the risk of non-compliance is high or the consequence of non-compliance significant, there is a higher degree of monitoring*."

Managing the risks – registered medicines, API's and blood, tissues and cellular therapies

Risk rating	Third and subsequent consecutive A1	Second consecutive A1	First A1	A2	A3
H	36 + reduced scope inspection	36	24	18	12
M	36 + reduced scope inspection	36	30	20	15
L	36 + reduced scope inspection	36 + reduced scope inspection	36	24	18

Managing the risks – listed medicines

Risk rating	Third and subsequent consecutive A1	Second consecutive A1	First A1	A2	A3
L	48 + reduced scope inspection	48	42	30	18
Other	• Reinspection only if risk information or complaint • Biennial compliance review (desk top)				

Monitoring and ensuring compliance

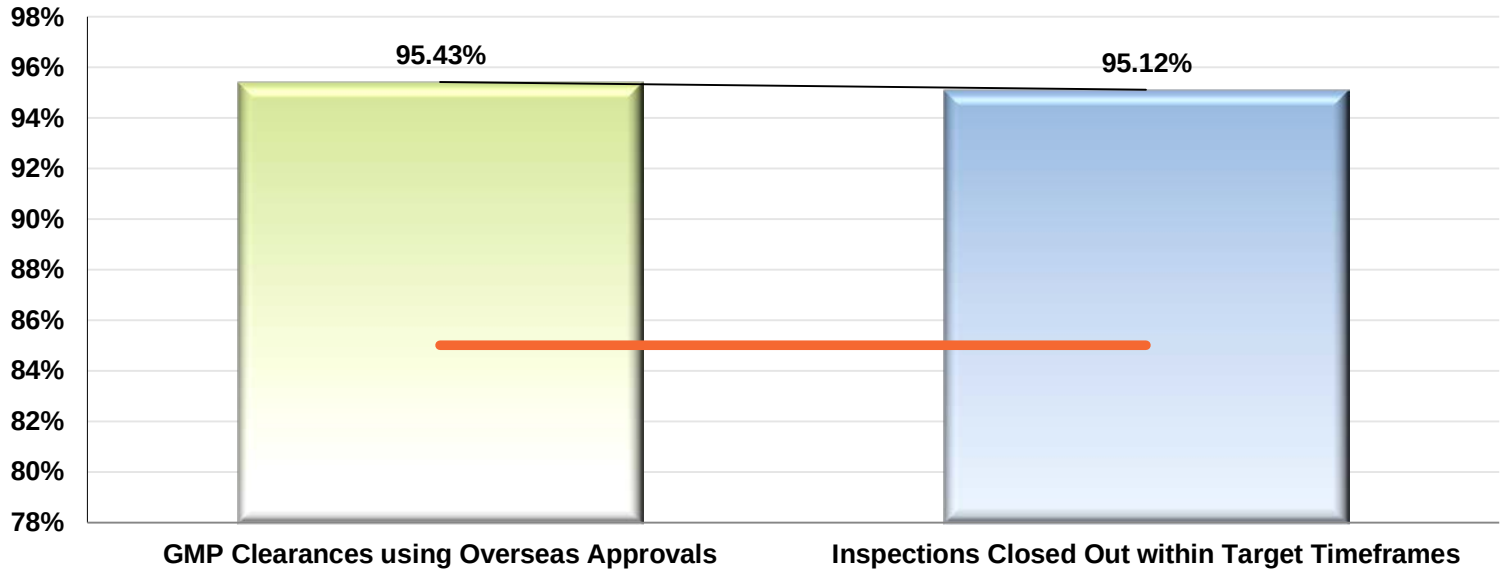
“A full suite of regulatory tools is appropriately utilized to ensure compliance.”

Monitoring and compliance tools

- Collaboration with international regulators
- Manufacturing quality signal detection
- Unannounced inspections
- Bring planned inspections forward
- Condition, cancel, suspend GMP licence
- Cancel GMP clearances

Portfolio Budget Statement

16/17 Financial Year



Source: data extracted 1 November 2016

Common deficiencies

2015 – Domestic manufacturers	
Poor Investigations	Quality risk management
Inadequate procedures	Environmental monitoring
Automated systems	GMP contracts
Poor records	Microbial contamination
Validation	Training

Common deficiencies

2015 – Overseas manufacturers	
Poor Investigations	Testing
Inadequate procedures	Labelling
Storage	Document control
Validation	Potential for cross contamination
Automated systems	Training

Common deficiencies

2016 – Domestic manufacturers (trends up to August 2016)	
Poor procedures	Quality Risk management
Microbial contamination	Environmental monitoring
Automated systems	Potential for cross contamination
Poor records	Training
Validation	Cleaning

Common deficiencies

2016– Overseas manufacturers (trends up to August 2016)	
Poor procedures	Quality risk management
Inadequate Investigations	Environmental monitoring
Automated systems	Change control
Poor records	Microbial contamination
Validation	Training

What's ahead

- The adoption of the latest PIC/S revision
- Continued work with PIC/S
- Greater awareness of Data Integrity areas (not new)
- Revision of the GMP guidelines for overseas manufacturers
- Embedding the new risk based inspection processes

Questions