Tutkimuslääkkeiden GMP

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Pirjo Hänninen

Kliinisiä lääketutkimuksia koskeva EU:n asetus Regulation (EU) No 536/2014

- Hyväksytty 16.4.2014 (voimaan 28.5. 2016)
- Kumoaa nykyisen lääketutkimusdirektiivin (2001/20/EY)

- Aiheuttaa muutoksia IMP GMP:hen
  - Eriytetään GMP-direktiivistä 2003/94/EC
- Delegated 22 Act article 63(1) määrittää IMP valmistuksen

=> seurauksena on laadittu komission ohjeen mukaan

Stand alone Guideline published 8th of Dec 2017,applicable as from the date of entry into application of Regulation (EU) No 536/2014 on Clinical Trials), EU portaalin voimaantulo 2020 alkuvuonna

Annex 13:a mukaillen

Key changes compared to Annex 13

- Introduction & Scope
  - Guideline will become stand alone document
  - Important to retain cross links to Eudralex Volume 4
- Pharmaceutical Quality System
  - Introduction of quality risk management principles by reference to Chapter 1 of Eudralex Volume 4
- Documentation
  - Retention period depending on type of record
  - Records and retention arrangements required for sponsor’s clinical trial master file to be defined in an agreement with manufacturer
- Product Specification File
  - Additional examples of documents to be included
  - Details of supply chain (consistent with updated Annex 16)
  - Details of reference and retention sample plans

Key changes compared to Annex 13

- Production
  - Clarification of premises and equipment qualification and process validated expectations (consistent with updated Annex 15)
- Packaging & Labelling
  - Confirmation re-packaging and re-labelling may be performed under Article 61(5) exemption and does not require QP certification
- Quality Control
  - Reference and retention sample definitions updated
- Release of batches
  - Clause related to imported comparator products removed. If QP cannot obtain adequate assurance of equivalent GMP, then product cannot be used
  - Additional references to Annex 16 principles added including verification of supply chain
- *Shipping*
  - *Section removed at request of Commission*

Key changes compared to Annex 13

- Outsourcing
  - New section introduced with reference to Chapter 7
- Glossary
  - Updated
- Tables
  - Table 1 – Summary of labelling detail removed as labelling requirements detailed in Annex VI of EU Regulation No. 536/2014
  - Table 2 – Batch release of products removed at Commission's request
  - Table 3 – Content of the Batch Certificate removed at Commission's request.

Guideline on the responsibilities of the sponsor with regard to handling and shipping of investigational medicinal products for human use in accordance with Good Clinical Practice and Good Manufacturing Practice

The guideline lays down the principles for management of the investigational medicinal products by the sponsor for use in a clinical trial and in accordance with Good Clinical Practice (GCP) which are at the interface with, and complementary to, Good Manufacturing Practice

- *2-stage release process*
  - *QP Certification (annex 16)*
  - *Regulatory release (green light), sponsor*
    - Contracts with investigators and applicable service providers
    - If the authorisation of the clinical trial is subject to conditions, that these conditions are met
    - Any local/national approvals
    - Where applicable, de-coding arrangements are in place

- *Shipping*

- *Contractual arrangements*

Differences IMP versus commercial

- Qp release needed for both
- Release testing for IMP from third countries not needed, QP have to ensure the GMP level for the IMP