QP Declaration

10. Oktober 2023

Mag. Gabriela Schallmeiner

Import aus Drittland

- **Importierende“ QP** trägt die volle Verantwortung für die GMP- Konformität

  ✓ „Vertrauen“ auf QP-Bestätigung nicht möglich ► kein CoC aus Drittland akzeptabel

  ✓ „Zuverlässigkeit“ der Tests in Drittländern gegeben?

  ✓ Prüfung nur in EU-GMP-zertifizierten Einrichtungen (MA) oder unter EU-äquivalenten Bedingungen (IMP)?

  ✓ Transportbedingungen angemessen?

- Gilt für alle importierten Produkttypen!

QP Declaration-Prüfpräparate

- Eine **QPD** (Qualified Person's Declaration) ist für die GMP-Konformität von in Nicht-EU-Ländern hergestellten IMPs erforderlich.
- Damit bestätigt die QP, dass das in einem Drittland hergestellte IMP die EU-GMP-Standards für IMP erfüllt.
- Dies kann entweder durch ein persönliches Audit vor Ort oder durch ein Audit, das von einem Dritten oder einer anderen nicht vom Importeur beschäftigten QP durchgeführt wird, nachgewiesen werden.
- Wenn kein Audit durchgeführt wurde, sollte eine kurze Begründung und Erläuterung bereitgestellt werden, in der beschrieben wird, wie die QP sicherstellen kann, dass Standards, die mindestens den EU-GMP entsprechen, am Standort befolgt werden
- Wird gemeinsam mit den CTA Dokumenten eingereicht und ist von den Behörden zu genehmigen basierend auf der eingereichten IMPD (S.2. & P.2 ff).

QP Declaration- IMP nach Direktive 2001/20/EC

EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Health systems and products
Medicinal products – quality, safety and efficacy

Brussels,
SANCO/D/6/SF/mg/ddg1.d.6(2013)1104750

TEMPLATE FOR THE QUALIFIED PERSON'S DECLARATION EQUIVALENCE TO EU GMP FOR INVESTIGATIONAL MEDICINAL PRODUCTS MANUFACTURED IN THIRD COUNTRIES

This document provides the template for the *Qualified Person's Declaration Concerning GMP Compliance of the Investigational Medicinal Products* as per Commission guideline CT-1,[1] section 2.7.1, paragraph 62.

The aim is to harmonise this template and hence the dossier submitted with a request for authorisation of a clinical trial.

Document history:	
Date of discussion of draft by the ad-hoc group for the development of implementing guidelines for the "Clinical Trials Directive" 2001/20/EC:	30 April 2013
Date of publication:	See above
Date of coming into operation:	6 months date of publication
Supersedes:	N/A
Changes compared to superseded version:	N/A

[1] Detailed guidance for the request for authorisation of a clinical trial on a medicinal product for human use to the competent authorities, notification of substantial amendments and declaration of the end of

QUALIFIED PERSON'S DECLARATION EQUIVALENCE TO EU GMP FOR INVESTIGATIONAL MEDICINAL PRODUCTS MANUFACTURED IN THIRD COUNTRIES[2] (ARTICLE 13(3)(b) OF DIRECTIVE 2001/20/EC)

EudraCT number(s)	**Name of the IMP(s)**

Manufacturing and/or Importation Authorisation (MIA) number[3] under which this declaration is made:_____

Part A

Name of the IMP(s)	**Manufacturing site(s)** (Name and address where the activity is performed)	**Activity performed at this site** (including packaging, labelling and testing)

Part B

I confirm that I am a QP and am authorised to make this declaration.

I declare that compliance with GMP at least equivalent to EU GMP has been verified on the basis of:

(i) Audit

Manufacturing site(s) (Name and address where the activity is performed)	**Auditing party**	**Date of last audit (completion)**

[2] Countries other than EU Member States or contracting states of the European Economic Area (EEA).

[3] If no number is issued please state the name of the authorisation holder.

2

(ii) If an audit of the site has not been performed, please provide a brief justification and explanation on how the QP knows that standards at least equivalent to EU GMP are being followed at the site[4].

Manufacturing site(s) (Name and address where the activity is performed)	**Justification**

This declaration is submitted by:

Signatory _____ Date _____

Print name _____

https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-10/2013-12_qp_template_imp.pdf

QP Declaration- IMP nach CTR

EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY
Health systems, medical products and innovation
Medical products: quality, safety, innovation

Brussels
SANTE.DDG1.B.4/KB

TEMPLATE FOR THE QUALIFIED PERSON'S DECLARATION EQUIVALENCE TO EU GMP FOR INVESTIGATIONAL MEDICINAL PRODUCTS MANUFACTURED IN THIRD COUNTRIES

This document provides the template for the certification by the qualified person in the Union that the manufacturing of an investigational medicinal product (IMP) outside of the EU/EEA complies with GMP at least equivalent to the GMP in the Union, as described in the Clinical Trials Regulation 536/2014[1]

The aim is to harmonise this template and hence the information submitted with a request for authorisation of a clinical trial.

Document history:	
Date of discussion by the Clinical Trial Expert Group:	06/07/2022
Date of publication:	06/09/2022
Date of coming into operation:	At publication
Supersedes:	Version May 2013

1 Regulation (EU) No 536/2014 of the European Parliament and of the Council of 16 April 2014 on Clinical Trials On Medicinal Products For Human Use, And Repealing Directive 2001/20/EC

QUALIFIED PERSON'S DECLARATION EQUIVALENCE TO EU GMP FOR IMP MANUFACTURED IN THIRD COUNTRIES[2] (ARTICLE 63 AND ANNEX I (F) (33) (b) OF REGULATION (EC) 536/2014)

EUCT number(s)	Name of the IMP(s)

Manufacturing and/or Importation Authorisation (MIA) number[3] under which this declaration is made: DE_BW_01_MIA_2022_0067/DE_BW_01_Fisher

Part A

Name of the IMP(s)	Manufacturing site(s) (Name and address where the activity(-ies) is (are) performed)	Activity(-ies) performed at this site (including packaging, labelling, storage, testing and release)

Part B

☒I confirm that I am a QP and am authorised to make this declaration.

☒I declare that compliance with GMP at least equivalent to EU GMP has been verified on the basis of:

(i) Audit

2 Countries other than EU Member States or contracting states of the European Economic Area (EEA).

3 If no number is issued please state the name of the authorisation holder.

Manufacturing site(s) (Name and address as in part A)	Auditing party	Date of last audit (completion)

(ii) If an audit of the site has not been performed, please provide a brief justification. Also, please explain how the QP knows that standards at least equivalent to EU GMP are being followed at the site[4].

Manufacturing site(s) (Name and address as in part A)	Justification

This declaration is submitted by:

Signature: _____ Date: _____

Name and role: _____

4 E.g. assessment of documentation provided by the manufacturer, valid GMP certificate (EudraGMP), etc.

QP Declaration- kommerzielles Produkt

- Für Marktzulassungen ist eine QP-Erklärung erforderlich, um zu bestätigen, dass der Wirkstoff für Verwendung in der Human- und Veterinärarzneimittel gemäß GMP (Teil II) hergestellt wurde.
- Generell ist eine QPD von jedem registrierten Hersteller und Importeur (MIAH) im EWR, der das API als Ausgangsmaterial und/oder für die QP-Zertifizierung des Endprodukts verantwortlich ist, erforderlich.
- Wenn mehr als ein MIAH beteiligt ist -> eine QPD -> im Namen aller beteiligten QPs
  -> QP, die Erklärung abgibt, ist diejenige, der spezifisch die Verantwortung für die GMP-Compliance für API Hersteller hat .
- Guidance for the template for the qualified person's declaration concerning GMP compliance of active substance manufacture "The QP declaration template"

https://www.ema.europa.eu/en/documents/regulatory-procedural-guideline/guidance-template-qualified-persons-declaration-concerning-good-manufacturing-practice-gmp_en.pdf

QP Declaration- kommerzielles Produkt (2)

MIAH muss sicherstellen dass:

- ✓ Überprüfen der GMP-Konformität für jeden registrierten Wirkstoffhersteller, auch wenn er nicht routinemäßig verwendet wird.
- ✓ Definieren der vollständigen Lieferkette und der darin verwendeten Wirkstoffe.
- ✓ Wenn MIAH nicht direkt für das Audit der API Produktionsstätte(n) verantwortlich ist, muss die QP trotzdem sicherstellen, dass entsprechende Vereinbarungen getroffen werden zur Überprüfung.

Basis für die QPD:

- Die QP-Erklärung muss auf eine Audit des basieren API Herstellers basieren. Es handelt sich um etablierte bewährte Verfahren, nach denen das Audit durchgeführt werden sollte am Produktionsstandort (Vor-Ort-Audit).
- Audits im Namen des MIAH nur durch entsprechend geschulte und erfahrene Personen durchgeführt werden durch Dritte.

QP Declaration- kommerzielles Produkt (3)

Außergewöhnliche Umstände, in denen ein Vor-Ort-Audit „nicht praktikabel“ ist:

- aufgrund des API Typs , sind ausgeschlossen vom Geltungsbereich der Deklarationsvorlage.
- ein „nicht on site“, remote oder „papierbasiertes“ Audit kann im Hinblick auf das Nutzenrisiko gerechtfertigt sein, muss aber im Einzelfall geprüft werden .

✓ In solchen Fällen wird erwartet, dass ein geeignetes Qualitätssystem zur API Herstellung angewendet wird. Die Kontrollen müssen Vertrauen in das API schaffen geeignet zu sein und keinen negativen Einfluss auf die Sicherheit und Wirksamkeit des Arzneimittels zu haben. Von der QP wird erwartet, dass er die eingeführten Kontrollen auf wissenschaftlicher Grundlage begründet und eine Risikobewertung auf produktspezifischer Basis erstellt.

Hilfestellung:

European Medicines Agency: Inspections: Q&A: Good Manufacturing Practice (GMP)

EU GMP guide part II Basic requirements for active substances used as starting materials: GMP compliance for active substances

Q6: The Notice to Applicants requires the submission of a declaration signed by the Qualified Person that the active substance used is manufactured in accordance with GMP.

https://www.ema.europa.eu/en/human-regulatory/research-development/compliance/good-manufacturing-practice/guidance-good-manufacturing-practice-good-distribution-practice-questions-answers

QP Declaration- kommerzielles Produkt (4)

Section (iii) supplementary information

-> bezieht sich auf ergänzende Informationen, zur Unterstützung eines risikobasierten Ansatzes bei der Festlegung von Prioritäten für ein eigenes Auditprogramm.

Zum Beispiel:

- Ergebnisse von Inspektionsberichten oder GMP-Zertifikaten, die von der EMA ausgestellt wurden,
- gegenseitige Anerkennung (MRA) zusammen mit anderen unterstützenden Informationen.
- Bei Humanarzneimitteln kann dies auch die schriftliche Bestätigung der GMP-Konformität der zuständigen Behörde des ausführenden Drittlandes gemäß Artikel 46b Absatz 2 Buchstabe b der Richtlinie 2001/83/EG umfassen.
- Eine Auflistung der relevanten Anlagen sollte in der bereitgestellten Tabelle erfolgen.

QP Declaration-API

EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

21 May 2014
EMA/334808/2014
Compliance and Inspections Department

Qualified Person's declaration concerning GMP compliance of the active substance manufacture "The QP declaration template"

Reference Number _____

PART A: Concerned active substance manufacturing sites

Name of Active Substance:

Name and Address of Active Substance Manufacturing Site[1,2]	**Manufacturing Operation / Activity[3]**

1. List each site involved in the synthesis of the active substance beginning with the introduction of the designated active substance starting material, include intermediate manufacturing sites / part-processing sites.
2. State the site name and address in detail, including the building numbers (if applicable).
3. For example – Full or partial manufacture of the active substance, micronisation.

7 Westferry Circus ▪ Canary Wharf ▪ London E14 4HB ▪ United Kingdom
Telephone +44 (0)20 7418 8400 Facsimile +44 (0)20 74 18 85 95
E-mail info@ema.europa.eu Website www.ema.europa.eu

PART B: Manufacturing / Importer Authorisation Holder(s) (MIAHs) to which this QP declaration applies

This QP declaration is applicable to the following registered MIAH(s), that use the active substance as a starting material and/or is responsible for QP certification of the finished batch of a human or veterinary medicinal product, where the active substance is registered as a starting material and is manufactured at the sites listed in Part A:

MIAH Site	**MIAH Number**	**Manufacturing Activity**

PART C: Basis of QP Declaration of GMP Compliance

Please tick section (i), complete the table in section (ii) and, if applicable, add the supplementary supporting information to section (iii).

(i) ☐ On-site audit of the active substance manufacturer(s)

(ii) Audit(s) of the active substance manufactured at the site(s) listed in PART A has/have been completed either by the MIAH(s) listed below or by a third party auditing body(ies) i.e. contract acceptor(s) on behalf of the MIAHs i.e. contract giver(s) as listed:

MIAH Site (or contract giver)	Auditing body (contract acceptor)	Site audited	Date of audit[4]

4 Justification should be provided if the date of last audit exceeds 3 years:

QP Declaration-API (2)

(iii) Supplementary supportive information (optional):

Results of inspections or GMP certificate(s) issued by EEA, MRA partners or other recognised authority together with other supporting information are attached.

Summary of supporting information provided

PART D: QP declaration of GMP compliance

I declare that:

QP Responsibility

- I am a QP with specific responsibility for GMP compliance of the active substance manufactured at the sites listed in Part A and I am authorised to make this declaration.
- The audit report(s) and all the other documentation relating to this declaration of GMP compliance of the active substance manufacturer(s) will be made available for inspection by the competent authorities, if requested.

GMP Compliance

- The manufacture of the named active substance at sites given in Part A is in accordance with the detailed guideline on good manufacturing practice for active substances used as starting materials as required by Article 46(f) of Directive 2001/83/EC and Article 50(f) of Directive 2001/82/EC.
- This is based upon an audit of the active substance manufacturer(s).
- The outcome of the audit confirms that the manufacturing complies with the principles and guidelines of good manufacturing practice.

Audit

- In the case of third party audit(s), I have evaluated each of the named contract acceptor(s) given in Part C and that technical contractual arrangements are in place and that any measures taken by the contract giver(s) are documented e.g. signed undertakings by the auditor(s).
- In all cases, the audit(s) was/were conducted by properly qualified and trained staff, in accordance with approved procedures.

Responsibilities in the case of multiple MIAH(s):

- This declaration is made on behalf of all the involved QPs named on the relevant MIAH(s) specified in Part B;
- A documented procedure defining GMP responsibilities is in place and that technical agreements exist between the named companies concerning management of GMP responsibilities.

Part E: Name and Signature of QP responsible for this Declaration

This declaration is submitted by:

Signatory	**MIAH Site**
Print name	
Date	
Status (job title)	**MIAH number**

https://www.ema.europa.eu/en/template-qualified-persons-qp-declaration-concerning-good-manufacturing-practice-compliance-active

Danke für Ihre Aufmerksamkeit!

Kontakt:

In der Hofmauer 44/1, 2102 Hagenbrunn (bei Wien), Austria
T: +43 2262 673066 / Mobile: + 43 664 143 1678
Mag. Gabriela Schallmeiner: gabriela.schallmeiner@inspection-ready.com
www. Inspection-ready.com

Austrian Qualified Person Association (aqpa) : info@austria-qp.at