GOOD MANUFACTURING PRACTICES INSPECTION MANUAL FOR

IMMUNOLOGICAL VETERINARY PRODUCTS

INTENDING TO USE

MUTUAL RECOGNITION PROCECCES

IN THE EAST AFRICAN REGION

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INTRODUCTION

As part of the harmonized process for registration of Immunological Veterinary Products (IVPs) in the East African region, the EAC Technical Working Party (TWG), with technical and financial support from GALVmed, established Harmonised Guidelines for Registering Veterinary Immunologicals. In addition to harmonisng the process for assessment of registration dossiers, the TWG has developed specific guidelines for Good Manufacturing Practice (GMP) inspections of the manufacturers of veterinary immunological products.

Acknowledging the good work that has already been carried out to establish standards of GMP for human and veterinary pharmaceuticals, the TWG has taken into account other GMP Guidelines such as those of the EU:

and the EAC GMP Inspection Harmonised Guidelines Compendium DOCUMENT NO: EAC/TF-MED/GMP/FD/COM/N1R0 .

In addition to the above, there exist guidelines developed specifically for veterinary immunologicals, namely:

the OIE Guidelines:

- oie.int/fileadmin/Home/eng/Health_standards/tahm/**3.7.0**_INTRODUCTION.pdf
- oie.int/fileadmin/Home/eng/Health_standards/tahm/**3.7.01**_MANUF_SITES_VACCINE_ORG_MANAGE_RQ-CCOIE.pdf
- oie.int/fileadmin/Home/eng/Health_standards/tahm/**3.7.02**_MANU_SITES_VACCINE
- oie.int/fileadmin/Home/eng/Health_standards/tahm/**3.7.03**_MANU_SITES_ASCEPTIC_PROD.pdf_PROD_CONTROL.
- and the **EU Guidelines Annex 5**, :Manufacture of Immunological Veterinary Medicinal Products, which is to be found as Appendix 5 of this manual.

Many aspects of GMP inspection are common to inspections of both pharmaceutical products and immunological products, e.g. Preparation for an Inspection. For guidance on those aspects the reader is directed to the EAC Harmonised GMP Guidelines Compendium, the Table of Contents for which is appended (5) to this manual for ease of reference.

Thus, the present IVP GMP Manual is for use in those cases where the EAC GMP Inspection Harmonised Guidelines Compendium does not provide appropriate guidelines for inspection of Immunological veterinary products.

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Abbreviations

BMR: Batch Manufacturing Record

CAPA: Corrective Action and Preventive Action

CC: Concerned Country

CoA: Certificate of Analysis

C: Conformance

CGMR: Coordination Group for Mutual Recognition

EAC: East African Community

EU: European Union

GALVmed: Global Alliance for Livestock Veterinary Medicines

GMP: Good Manufacturing Practice

HVAC: Heating Ventilation Air-conditioning and Cooling

IVP: Immunological Veterinary Product

MA: Marketing Authorization

MR-C: Mutual Recognition Coordinator

MRP: Mutual Recognition Process

NC: Non Conformance

NRA: National Regulatory Authority

NMRA: National Medicines Regulatory Authority

NMRO: National Medicines Regulatory Officer

OIE: World Organization for Animal Health

PW: Purified Water

QA: Quality Assurance

QC: Quality Control

QA/QC: Quality Assurance/Quality Control

RC: Reference Country

RM: Raw Materials

SOP: Standard Operating Procedure

TWG: Technical Working Group

1. TYPES OF INSPECTION

GMP inspection is the act of conducting official review of documents, facilities, records, and any other resources to assess their conformity to the requirements of EAC - Good Manufacturing Practices (GMP) of Veterinary Immunological Products.

There are four types of inspection as indicated below;

i. Routine inspection
ii. Concise inspection
iii. Follow-up inspection
iv. Special inspection

1.1 Routine inspection

Routine inspection is a full review of all aspects and components of GMP within a facility. Routine inspection is conducted under the following circumstances:

i. To a newly established manufacturing facility or a manufacturer who has expressed interest of expanding manufacturing activities e.g. introduction of new products.

ii. When a registered veterinary immunological product is due for renewal.

iii. When there are significant changes such as introduction of new product lines; modification to manufacturing methods or processes; or changes in key personnel, premises and/or equipment.

iv. If an inspection has not been carried out for the past 5 years.

This type of inspection should be announced.

1.2 Concise (Abbreviated) inspection

Concise inspection is the evaluation of limited aspects relating to GMP compliance within a facility. A limited number of GMP requirements are selected by the inspector to serve as indicators of the overall GMP compliance by the manufacturer. The inspector also has to identify and evaluate any significant changes that could have been introduced by the manufacturer since the last inspection.

Collectively, the selected indicators and the changes identified indicate the manufacturer's attitude toward GMP.

A concise inspection is conducted under the following circumstances:

i. Where a manufacturer has a consistent record of compliance with GMP through routine inspections in the past.

ii. Where a sample of aspects can be taken as a good indication of the overall level of compliance with GMP.

However, if the concise inspection uncovers evidence that the level of GMP compliance has fallen, a more comprehensive or full GMP inspection should be performed soon after the concise inspection.

These inspections can be announced or unannounced.

1.3 Follow-up inspection

A follow up inspection is also referred to as a re-inspection or a reassessment of the manufacturing facilities. It is performed specifically to monitor the result of corrective actions of the manufacturer following a previous inspection. Depending on the nature of the defects and the work required, the follow-up inspection could be carried out between 6 and 12 months after the previous inspection.

The follow-up inspection is limited to specified GMP requirements that have not been observed or that have been inadequately implemented by the manufacturer. There are number of circumstances in which special visits or inspections may be necessary.

Where a time limit was given for applying the corrective measures, the inspection should be unannounced.

1.4 Special/Investigative inspection

A special inspection is undertaken to do spot checks which could focus on one product, a group of related products, or specific operations e.g. mixing, or labeling.

Special inspection is conducted under the following circumstances:

i. When there are complaints about a specific product that suggest there may be defects.

ii. When there is a product recall due to events such as adverse reactions to an immunological product.

iii. To gather specific information, or to investigate specific operations of the manufacturing processes.

The inspection should be unannounced.

2. QUALIFICATION OF GMP INSPECTOR

Each Partner State's Regulatory Authority shall appoint inspectors to inspect domestic and overseas manufacturing facilities where IVPs used in the Region

are manufactured. GMP inspectors should have the necessary qualifications in order to effectively take part in inspection of veterinary vaccine manufacturing facilities. The qualification of the GMP inspector shall be based on the following:

- Academic education
- Training
- Experience

Academic education

GMP inspectors should have a university degree in a science subject with an industrial background preferably in veterinary vaccine production.

Where persons other than scientists are appointed as GMP inspectors, they should be adequately experienced in veterinary pharmaceutical and veterinary vaccine production, quality control and suitably trained in GMP inspection.

Training

In order to be competent to carry out inspections, Inspectors will be required to undergo training in GMP and GMP inspections. Such trainings would provide them with knowledge and skills needed when planning for, carrying out and reporting GMP inspections.

Apart from basic training, inspectors will also be required to undergo on the-job training by senior inspectors. Such trainings will involve both theory and practice of inspections and will cover inspection techniques, communication and management skills as well as conducting inspections and report writing as trainees.

Continuous training will be provided to inspectors to keep them abreast with the current knowledge and techniques in carrying out GMP inspections. This would be through attending training programmes, seminars, scientific meetings, conferences and exhibitions organized either by EAC Secretariat or other national and international organizations.

Experience

An inspector will be deemed experienced when;

a. He/she has conducted at least ten (10) GMP inspections.
b. He/she has evaluated at least ten (10) IVP applications dossiers.
c. He/she has demonstrated competence in communication skills and report writing.

Such experience will be taken into consideration when planning for and conducting GMP inspections

3. PLANNING FOR GMP INSPECTION

The Reference Country shall be responsible for planning a GMP inspection of IVP manufacturing facilities. The planning for GMP inspection shall include preparation of annual inspection schedule and budget.

3.1 Inspection Schedule and budget

When preparing an annual schedule, the following criteria should be considered

a) The number of days required to inspect one IVP plant shall depend on the number of products of interest.

b) Travelling logistics, weather forecast and political stability of a country.

c) Submission of dossier, site master file and payment of GMP inspection fee.

d) Availability of funds.

e) Level of risks associated with manufacturing site or product.

f) Reported market complaints.

g) Whether it is first application or renewal.

The schedule shall include names, postal and physical addresses of a site, type of inspection, date of inspection and names of inspectors. The inspection shall be carried out by two GMP inspectors from the Reference Country. See **Appendix 1**

3.2 Preparation for GMP inspection

The preparation for GMP inspection shall be as per Model Procedure for Preparation for GMP inspection available as **Appendix 2**

4. CARRYING OUT INSPECTION

The GMP inspection shall be conducted as per Model Procedure for Conducting GMP Inspections available as **Appendix 3** with special consideration taken from the following EU GMP Guidelines, where appropriate:

Annex 1: Sterile injectable presentations provided as **Appendix 4**

Annex 5: Manufacture of Immunological Veterinary Medicinal Products, provided as **Appendix 5**

5. INSPECTION REPORT

The Template for the Inspection Report for inspections of veterinary immunologicals manufacturers is provided as **Appendix 6** to this Manual.

The inspection report should be written immediately after completing the inspection. The report shall be sent for review by the relevant committees. The RC shall ensure that the GMP inspection report is sent to the inspected facility within thirty (30) calendar days of final approval of the inspection report.

Observations made that are considered to be non-compliance with EAC GMP requirements should be listed and cross referenced. Where observations are included in the report, clear distinction should be made between "compliances" and "non-compliances". Non-compliance observations should be classified as "critical", "major" and "minor". These classes are detailed below.

5.1 Classification of GMP Inspection Observations

The intention of this part is to help classify the non-compliances observed during GMP inspection. Overall, the evaluation should commensurate with the nature and extent of the deviations (i.e. severity). Situations involving fraud, misrepresentation or falsification of source data or records linked with IVP manufacturing will result in a non-compliance rating.

See EAC Guideline EAC/PSS/AGRI-LIV/IVP-REG/GMP/Ver.1 in **Appendix 7**

6. RECOMMENDED REGULATORY ACTION(S)

Below is a table showing a set of regulatory actions that can be recommended by inspectors when making decisions on the outcome of inspections.

S/N	Category of non-compliances	Regulatory action(s)
1.	**Minor**	• Recommend corrective action within a given timeframe • Request for compliance report
2.	**Major**	• Issue warning letter • Recommend corrective action within a given timeframe • Recommend temporary withdrawal or suspension of marketing authorisation • Request for comprehensive compliance report • Follow-up inspection to verify implementation if necessary
3.	**Critical**	• Recommend permanent withdrawal of Marketing Authorisation in case of registered products • Recommend not to grant marketing authorisation for new application.

APPENDICES

Appendix 1: PROCEDURE FOR PLANNING FOR A GMP INSPECTION

1. PURPOSE

The purpose of this document is to ensure that GMP Inspectorates follow a standardized procedure when planning for routine GMP inspections. This should assist with ensuring a consistent approach in conducting inspections.

2. SCOPE

The scope of this SOP applies for planning GMP inspections of manufacturers of Immunological Veterinary Products (IVPs), both Active Ingredients and Finished Products, within the EAC Partner States.

3. RESPONSIBILITY

3.1 Head of NMRAs
3.2 Head GMP department
3.3 Lead Inspectors
3.4 GMP inspectors
3.6 Procurement department
3.7 Human Resource Unit

4. Distribution list

4.1 Head of NMRAs
4.2 Head of GMP departments
4.3 NMROs
4.4 GMP Inspection Coordinators
4.5 Quality assurance departments

5. PROCEDURES

5.1 Selection of Companies to be inspected

5.1.1 Selection of facilities to be inspected is considered an initial and crucial step in planning for an inspection.

5.1.2 The concerned department shall undertake the selection and ensure that:

5.1.2.1 The local technical representative or manufacturer should have filled in the details of the inspection on a form with details of actual site to be inspected, lines and contact details of the responsible persons.

5.1.2.2 The local technical representative/manufacturer will also have to pay the prescribed fee for the GMP inspection.

5.1.2.3 Inspections for applications through MRP take priority.

5.1.3 Without unduly contravening the provision 5.1.1 above, facilities may be selected based on;

5.1.3.1 Need to expedite an on-going MRP.

5.1.3.2 Public health/interest; Need to meet a health emergency in the country Others

5.1.3.3 Prevailing Socio-political atmosphere.

5.1.3.4 Economic/cost effectiveness of conducting the inspection.

5.1.3.5 Weather/climatic

5.1.3.6 Availability of inspectors with specialized expertise in the team

5.1.3.7 Level of compliance in the previous inspection (Type/class of findings in the previous inspection, Criminal/illegal practices)

5.1.3.8 Expiry of compliance certification

5.1.3.9 Type of inspection to be carried out (refer to Types of inspection).

5.2 Scheduling of Selected Companies for Inspection

5.2.1 Allocation of dates and durations of inspection shall be made based on;

5.2.1.1 Type of inspection to be performed and the purpose of the inspection or visit.

5.2.1.2 Anticipated duration of inspection based on plant size, number of blocks/production lines and activities

5.2.1.3 A combination of all, or some of the factors for selection as appropriate.

5.2.2 Scheduling to be carried out within a period of six months and allocated tentative dates will be checked and reviewed regularly within the specified period.

5.2.3 The Head of the GMP Inspectorate department shall appoint the inspection team and designate the lead inspector with the adequate competency as per the

inspection to be undertaken.

5.3 Out-of-Site Planning for the Inspection

Once the inspection is allocated to a dully-constituted inspection team, the GMP Unit shall be responsible for planning for the performance of the inspection as follows:

5.3.1 Inform the manufacturer(s) through the respective local agents of the proposed date(s) for the inspection and organize letter for invitation to assist in the preparation for travel.

5.3.2 Ensure that the proposed dates for the inspections are suitable for members of the inspection team.

5.3.3 Appropriately complete the form for the necessary information that will be used to organize the inspection and facilitate approval.

5.3.4 Verify the objective of the inspection that is to be carried out.

5.3.5 Determine what the scope and depth of the inspection will be to enable to prepare properly for the inspection.

5.3.6 Scrutinize the relevant documents as indicated in SOP for Preparing for inspection (Appendix 2).

5.4 Dossier Submission

The registration application dossier has to be submitted before the GMP inspection is carried out. The manufacturer must have been given GMP approval before the Marketing Authorisation is issued.

5.5 Re-Inspection

The CAPA and/or previous GMP inspection reports should be reviewed before planning for the GMP inspection.

Appendix 2: STANDARD OPERATING PROCEDURE (SOP) FOR PREPARING FOR GMP INSPECTION

1. PURPOSE

The purpose of this document is to ensure that a standardized procedure is followed by all inspectors when preparing for routine inspections in order to ensure a consistent approach in conducting inspections.

2. SCOPE

The scope of this SOP applies for preparation of GMP inspections of manufacturers of IVPs, both Active Ingredients and Finished Products within the EAC Partner States.

3. RESPONSIBILITY

3.5 Head of NMRAs
3.6 Head GMP department
3.7 Lead Inspectors
3.8 GMP inspectors

5. DISTRIBUTION LIST

4.1 Head of NMRAs
4.2 Head of GMP departments
4.3 NMROs

5. PROCEDURE

5.1. Inspectors should properly prepare for inspections, including familiarization with products, sites, types of technologies and relevant pharmacopoeial monographs/OIE Chapters.

5.2 Once the inspection is allocated to the inspection team, the Lead Inspector is responsible for planning for the performance of the inspection as follows:

5.2.1 Inform the relevant people meant to prepare the relevant documents at least 14 days before inspection.

5.2.2 Verify the objective of the inspection that is to be carried out.

5.2.3 Verify whether the inspection will cover the entire factory or just part of it.

5.2.4 Determine what the scope and depth of the inspection will be to prepare properly for the inspection.

5.2.5 Scrutinise the product dossiers for the products manufactured in the respective manufacturing site.

5.2.6 Decide what products will be covered during the inspection.

5.2.7 Review the dossier assessment reports for individual products to be inspected, including the assessment remarks.

5.2.8 Liaise with relevant departments/officers for any specific information related to the following;

5.2.8.1 Review Pharmacovigilance and post marketing surveillance reports.

5.2.8.2 Review product dossiers and any notifications/ variations

5.2.8.3 Review previous inspection reports/CAPAs, if available.

5.2.9 Confirm the amount of time that will be required to carry out the inspection and plan the date when the inspection will take place. A routine inspection for one site can be performed over a period of at least two to five working days. The length of an inspection is determined by a number of factors, including the type of inspection to be performed, the number of inspectors, the size of the company and the purpose of the inspection or visit.

5.2.10 Study the Site Master File and make notes to be followed up during the inspection (e.g. available equipment, SOPs, records). Study the layout and design of the facility to get a better understanding of the flow of material, personnel and processes in the facility. Study some of the systems the organisation has in place (e.g. HVAC and Water).

5.2.11 If a current SMF does not exist, request an updated copy from the company.

5.2.12 If desired, prepare a checklist of points to be verified during the inspection. Prepare notes for verification in the aide memoire specific to site to be verified during the inspection.

5.2.13 Prepare a Tentative Inspection Plan which can be used as a template that can be modified. Indicate in the programme which sections or departments will be inspected, and when.

5.2.14 Distribute the Plan to the team members for comments and, after finalisation, to the company approximately 2 weeks before the inspection.

6. RE-INSPECTION

During preparation for GMP inspection, the CAPA and/or previous GMP inspection reports should be reviewed.

Manufacturer:	
Address:	
Date:	
Reference:	
Inspector(s):	

TIMES FOR GUIDANCE ONLY

Day 1 – AM	
OPENING MEETING 8.30 AM	Introductions
	Objectives and scope of the inspection
	Confirmation of the proposed programme
	Brief presentation of the factory
	Recent changes
DOCUMENT REVIEW	Quality system
	QM and quality policy
	Validation Master Plan
	Change control and deviation management: SOP's + summary list of changes and deviations
	Annual product review for above mentioned products
	Risk management
	Complaints: SOP + summary list of complaints
	Recalls: SOP + summary list of recalls
	Site plan, production block layout, indicating the HVAC system and AHU's, material and personnel flow
	HVAC system schematic drawing and summary of specifications for HVAC
	Purified water system plan and summary of specifications for PW
	Compressed air system schematic drawing and summary of specifications for compressed air
Day 1 – PM	
SITE INSPECTION	Receiving area and stores
	Starting materials, packaging materials and components
	Storage of Master Seeds and Working Seeds
	Finished product
DAY 2 – AM	
CONTINUATION OF SITE INSPECTION	Production of antigen(s) - following material flow

Day 2 – PM	
INSPECTION OF PRODUCTION ACTIVITIES	Production of finished vaccine - continuation Utilities • HVAC system • PW system • Filling line

Day 3 – AM	
LABORATORY INSPECTION	QC laboratory
	Equipment
	Laboratory materials management
	Microbiological laboratory
	Retention samples storage
	Animal housing
Day 3 – PM	
DOCUMENTS	Review of remaining documents
CLOSING MEETING	Approximately 4.30 pm

Notes:

- Tea and lunch breaks will be taken at suitable times
- The inspection will start at approx 8.30 am and finish at approximately 5 pm each day
- At the end of each day if need be a brief meeting will be held to review the findings and discuss the plan for the next day

Appendix 3: STANDARD OPERATING PROCEDURE (SOP) FOR CONDUCTING GMP INSPECTIONS FOR IVPS

1. PURPOSE

The purpose of this document is to outline procedures for EAC NMRAs participating in GMP inspections, taking into account risk based approaches, building on similar GMP standards and mutual confidence and agreement between regulatory authorities.

2. SCOPE

The scope of this procedure includes GMP inspections of manufacturers of IVPs, FPPs and of APIs, which are of common interest to two or more EAC NMRAs involved in a MRP application. It is recommended for both pre- and post-approval inspections.

3. RESPONSIBILITY

3.1 Head of NMRAs to allocate adequate resources

3.2 Head GMP department:

- 3.2.1 Ensuring that administrative or enforcement actions at national/regional level are undertaken as appropriate e.g. database entry, issuance/update of certificates/licences.
- 3.2.2 Act as a contact person at the NMRA and to share any information relevant to NMRA's inspections.
- 3.2.3 Appoints and assigns inspectors, or lead inspector if required, to an inspections

3.3 The lead inspector has the following duties:

- 3.3.1 Setting a reporting deadline in agreement with all team members taking into account any specific deadlines linked to on-going submissions/applications or procedures.
- 3.3.2 Technical preparation of the inspection with the inspected facility representative and in liaison with the other inspectors of the team.
- 3.3.3 Establishing a draft inspection plan in cooperation with the involved regulators and arranging for a pre-inspectional preparation meeting;

3.3.4 Leading the conduct of the inspection on site.

3.3.5 Communication between the representative of inspected facility and the inspection team.

3.3.6 Facilitate the discussion for all the findings/observations jointly agreed with the inspection team

4. DISTRIBUTION LIST

4.1 Head of NMRAs

4.2 Head of GMP departments

4.3 NMROs

4.4 GMP Inspection Coordinators

4.5 Quality assurance departments

5. PROCEDURE

5.1 General Details

5.1.1 For this procedure, general principles and terms of reference agreement shall apply as necessary.

5.2 Planning for the inspection. See Appendix 1

5.3 Preparation for the inspection. See Appendix 2.

5.3.1 The inspection should be prepared following the "SOP for Preparation of GMP Inspection", with the following particulars;

5.3.1.1 The Manufacturer or its representatives (e.g. Marketing Authorization/product registration Applicant) provides a name and contact address and available information on the manufacturing site to be inspected. The information which has to be provided is mentioned in the relevant standard operating procedure.

5.3.1.2 The lead inspector should be the contact person for each inspection.

5.3.1.3 The NMRA will be in charge of the logistics arrangements of its inspectors.

6 Conducting the inspection

6.1 The inspection should be conducted following Appendix 3, Conducting GMP Inspection" with the following particulars;

6.2 Where applicable, according to the procedures of the EAC NMRAs, the inspection team shall provide the representative of inspected facility a written list of deficiencies at the conclusion of the inspection in a prescribed format.

7 Preparation and validation of the final report

7.1 The inspection report should be prepared following the "Appendix 8, Preparing and Reviewing GMP Inspection Report" with the following particulars;

7.2 The NMRA should establish a list of deficiencies and write a report. If any deficiency is notified according to the specific National requirements, this should be captured as annex of the GMP Inspection Report

7.3 The inspection report should be sent to the applicant following the national procedures asking for Corrective and Preventive Action (CAPA) report.

7.3 On receipt of responses of findings/observations, the authorities relevant committees should discuss and agree the responses and any action plan proposed by the representative of inspected facility taking into account applicable national/regional procedures.

7.4 A final inspection report (in English) in accordance with EAC requirements will be prepared to close out the inspection process..

8 Follow-up inspections

8.1 The Reference Country is responsible for any follow-up actions according to their own regulations and procedures.

8.2 In the case of a negative inspection result, the Inspection team will liaise with the Concerned Countries (CCs) to ensure a common understanding following "SOP for Follow up on non compliances" and if possible agree a conclusion before closing out the inspection and review process.

8.3 Any follow-up inspection should be organized as outlined in this procedure.

9 Dissemination of the final report

The final report should be forwarded to the CCs within the EA

1. PARTICULARS OF APPLICANT/LICENCE HOLDER

Name_____

Physical Address_____

Country_____Telephone_____

Fax_____E-mail_____

2. PARTICULARS OF SITE TO BE INSPECTED

Name of site_____

Physical Address (if different from 1. above)

_____

Country_____Tel_____

Fax_____E-mail:_____

Note*: Separate application to be filled in for each individual site*

2. APPLICATION IN EAC PARTNER STATES

Name of Country	Date of Submission

4. CONTACT PERSON ON SITE

Name of contact person_____

Tel:_____Fax:_____

E-mail:_____

5. AUTHORISED REPRESENTATIVE/AGENT IN THE COUNTRY

Partner State	Name of the LTR	Telephone

Name of Local Technical Representative_____

Tel:_____

6. TYPE OF MEDICINES

Type of medicines manufactured (*Tick where applicable*)

Veterinary Medicine ☐ / Veterinary Immunological ☐

7. REGISTRATION OF PRODUCTS

Have you registered any products in the country YES ☐ NO ☐

Have you submitted dossier for registration? YES ☐ NO ☐

If YES, list the products applicable. (*Attach a separate sheet if needed*)

……

Name of Product(s)	Description

**Activity means any of the following:

- Formulation (dispensing, mixing, blending)
- Processing
- Packing
- Quality Control
- Warehousing (raw material, finished products)

Commitment from manufacturers to welcome inspectors for inspection any time

I hereby certify that the above information is correct and apply for Good Manufacturing Practice inspection of the above-named site(s).

Signature of applicant…… Date……

Print Name……

Notes:

1. Please submit a copy of the Site Master File (not more than 25 pages) together with this application.

(Refer to EAC Guideline on Preparation of a Site Master File in EAC/TWG Guideline 11)

2. This application must be submitted together with the appropriate fee to the Heads of NMRAs

9. FOR OFFICIAL USE ONLY:

9.1 INSPECTION TYPE

(Please tick where applicable)

☐ First Inspection ☐ Re – inspection after failure

☐ Routine Re- inspection

Previous inspection date……

☐ Joint Inspection

☐ Other (please specify)……

9.2 OFFICER ASSIGNED FOR INSPECTION

Name of the Officers:

Name	NMRA	Contact (e-mails & telephone)

Appendix 4

Sterile injectable presentations

https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-4/2008_11_25_gmp-an1_en.pdf

Appendix 5

Manufacture of Immunological Veterinary Medicinal Products

https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-4/pdfs-en/anx05en200408_en.pdf

Appendix 6

Template for Report of GMP Inspection of Veterinary Immunologicals Manufacturer

Inspection Reference Number *To be provided by GMP Administrator*	MRP Reference Number Reference Country:	Report Date	*DD/MM/YYYY*

1.0 General Information

1.1 Inspected Site(s)

a) Name, location, full physical address, city, country;
b) telephone, email address, website;
c) manufacturing license numbers; and
d) name(s) and email addresses of contact person(s) of the inspected site or facility

1.2 Activities carried out by the company at the inspected site

Manufacture of active ingredient	
Manufacture of finished (medicinal) product	
Manufacture of intermediate or bulk if relevant	
Packaging	
Importing	
Laboratory testing	
Batch control and batch release	
Other.....	

1.3 Inspection date(s) State the date(s) of inspection in the format “date(s)/month/year”

1.4 GMP Inspectors

- Names of the GMP Inspectors that carried out the inspection.
- The team leader should be specified.

1.5 Foreign National Regulatory Authority Participation

For foreign inspections state whether, the NRA of the country where the inspection took place was informed and whether it took part in the inspection.

1.6 Type of inspection

State whether it was routine inspection, concise inspection, follow-up inspection (reassessment or re-inspection), or special GMP inspection.

1.7 Purpose of Inspection

Statement of the objective(s) or reason(s) for the Inspection (e.g. new marketing application, renewal of marketing authorization, or investigation of product defect, etc..)

1.8 Introduction

- Short description of the company and the activities of the company. Include products manufactured at the site, number and categories of employees and certifications or accreditations (if any)
- Other manufacturing activities carried out on the site (e.g. manufacture of pharmaceuticals, research and development).
- Use of outside scientific, analytical, or other technical assistance in manufacture and quality control

1.9 Previous inspections conducted by:

- **The Reference Country**
  - Dates of previous inspection and names of GMP Inspectors involved.
  - Report on the progress of corrective and preventive actions on all non-compliances listed in the previous GMP report, clearly stating the non-compliance, classification and corrective actions taken or not.

- **Other Regulatory Authorities**

Mention the names of the Regulatory Authorities, countries, dates and scope of the GMP inspections that were conducted.

1.10 Major changes since the previous inspection

1.11 Samples taken and results obtained (if applicable)

2.0 Brief Report of the Inspection activities undertaken

2.1 Scope of Inspection

a) Short description of what was covered in the inspection (what was planned to be inspected and what was actually inspected) and whether it was product related inspection and/or general GMP inspection.

b) Briefly specify the physical locations, organizational units and/or blocks, activities and processes as well as the time period of each area that was inspected.

c) State what was not inspected or covered and the reasons why it was not.

d) State the GMP guidelines used for assessing compliance

e) State the guidelines (e.g. OIE, EU) or pharmacopoeia used as testing standards

f) Names and titles (designations) of personnel met during the inspection (listed in an Annex to this report)

2.2 Observations and Findings

- Specify each area of the facility that was inspected. Relevant headings from the EAC Guidelines on Good Manufacturing Practice for Medicinal Products, Document Number, EAC/TF-MED/GMP/FD/COM/N1R0 should be used. New headings may be introduced as relevant. This section can link the findings to the deficiencies and used to explain classification.

For quick reference, refer to summary of the GMP sections, shown below.

Quality Management

Personnel

Premises and Equipment

Documentation

Production

Quality Control

Contract Manufacture and Analysis

Complaints and Product Recall

Self Inspection

Positive observations should take the form of a description of the processes that the firm is carrying out particularly well and that may be considered exemplary compliance to GMP.

Negative observations (non-compliances with GMP requirements) should be written in italics and should distinguish between whether the defect lies in the system itself or in the failure to comply with the system. For instance, when cleaning is found to be sub-optimal, it is important to know whether the SOPs are inadequate or lacking, or whether adequate SOPs exist but are not followed by personnel.

- Distribution and Shipment e.g. Compliance with Good Distribution Practice
- Questions raised relating to the assessment of a marketing application (dossier) e.g. pre- authorisation inspections
- Other specific issues identified e.g. Relevant future changes announced by company
- Site Master File (SMF). Assessment of SMF if any; date of SMF.

2.3 Annexes attached

Attach the necessary annexes to the report, chronologically numbered. The following Annexes should be included:

- Completed Facility and Inspectors' profile with names, designations and signatures of key personnel of the facility that participated in the Inspection.
- Copy of manufacturing license.

Attach any other annexes you find necessary.

Note: The annexes need not be included in the final report to be submitted to the facility

3.0 Summary of Deficiencies (non-compliances to GMP)

The deficiencies should be listed in order of importance and classified into critical, major and other. Refer to the Guide to Risk Classification of GMP Non-Compliances, document number

EAC/PSS/AGRI-LIV/IVP-REG/GMP/Ver.1 (Appendix 7)

All deficiencies should be listed and the relevant reference to the EAC Good Manufacturing Practice Manual and/or relevant EU, OIE or Pharmaceutical Inspection Co-operation Scheme (PIC/S) Guidelines where applicable should be mentioned.

All deficiencies found should be listed even if corrective action has taken place straight away.

If the deficiencies are related to the assessment of the marketing application, this should be clearly stated.

4.0 Recommendations and Conclusion

4.1 Recommendations

State any recommendations or actions to be taken by the Reference Country for the facility inspected.

The company should be asked to inform Reference Country about the progress of the corrective measures and a proposed time schedule for corrective and preventive actions not

later than three months from the date of the report.

4.2 Conclusion

The Inspection Team should state if the Company operates in accordance with the EAC GMP Guidelines using one of the three possible conclusions below:

- Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the observations listed in the Inspection Report, was considered to be operating at an acceptable level of compliance with EAC GMP guidelines.

  However, the observations (non-compliances with guidelines) listed below must be addressed in a timely manner. The manufacturer is expected to respond to all observations and for each include a description of the corrective action implemented or planned to be implemented, and the date of completion or target date for completion. The acceptability of corrective actions will be assessed through evaluation of the response to each observation and will be followed up during the next inspection.

or

- Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the observations listed in the Inspection Report, a decision on the compliance of with EAC GMP guidelines will be made after the manufacturer's response to the observations has been assessed.

  The manufacturer is expected to respond to all observations and for each include a description of the corrective action implemented or planned to be implemented, and the date of completion or target date for completion. In addition, for observations classified as "major", supporting documentation should be submitted with the response as objective evidence of completion of corrective actions. The acceptability of corrective actions will be assessed through evaluation of the response to each observation and will be followed up during the next inspection. If considered necessary, an on-site follow up inspection may be conducted to verify effective implementation of corrective actions.

or

- Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the observations listed in the Inspection

Report, was considered to be operating at an unacceptable level of compliance with EAC GMP guidelines.

Another inspection will be required to verify the implementation of corrective actions before the manufacturer's level of GMP compliance can be reconsidered.

Names, designation, Signatures and date

The report should be signed and dated on each page by the GMP Inspectors that carried out the Inspection.

Appendix 7

GUIDELINE FOR RISK CLASSIFICATION OF GMP DEFICIENCIES

1. PURPOSE

The purpose of this guide is to ensure uniformity among the EAC GMP inspectors in classifying observations and in determining the compliance status of manufacturers of veterinary immunologicals following GMP inspection.

2. DEFINITIONS

2.1 Critical observation: An observation describing a situation that will most likely result in a non-compliant product or a situation that may result in an immediate or latent health risk and any observation that involves fraud, misrepresentation or falsification of products or data.

2.2 Major observation: An observation describing a situation that may have an impact on the product but is not as significant as a critical observation. It may have an indirect impact in the immunogenicity, identity, purity or safety of the product. Observation of a major deficiency casts doubt on the reliability of the firm's quality assurance system.

2.3 Minor observation: An observation describing a situation that is a departure from GMP but has no significant impact on product quality. It has low probability of affecting the quality or usability of the product.

3. GUIDE

Whereas it is recognized that it is impossible to encompass every situation that may generate a risk, the following principles should be considered:

3.1 Classification of the observation is based on the assessed risk level and the number of occurrences. This may vary depending on the nature of the product, eg. in some circumstances an example of a major deficiency may be categorized as critical.

3.2 A deficiency that was reported at a previous inspection and not corrected may be reported in a higher classification of observation.

3.3 Generally, a GMP non-compliance (NC) rating is assigned when a critical observation is noted during an inspection.

3.4 Generally, a GMP compliance (C) rating is assigned when major observations are noted during an inspection after submission and satisfactory review of Corrective Action and Preventive Action. However, a NC rating may be assigned in the following situations;

3.4.1 Observations of numerous major deficiencies suggest that the company is not controlling processes and operations sufficiently.

3.4.2 Repetition of major observations noted during previous inspections indicates that the company did not:

a) implement the corrective actions notified at the time of the previous inspections.
b) put in place adequate preventive actions in a timely manner to avoid recurrence of such deviations.

3.4.3 A rating of GMP compliance will be assigned in all situations where only minor observations are noted.

3.5 Critical Observations

3.5.1 Premises:

3.5.1.1 No air filtration system to eliminate airborne contaminants that are likely to be generated during critical steps of manufacture.
3.5.1.2 Generalized malfunctioning of the ventilation system(s) with evidence of widespread cross-contamination.
3.5.1.3 Design of premises does not allow unidirectional flow of material and personnel are thus posing a risk of cross contamination.
3.5.1.4 The building material used for premises not fit for pharmaceutical industry e.g. asbestos roofing.
3.5.1.5 Inadequate segregation of manufacturing and of testing are as from other areas that pose serious contaminations.

3.5.2 Equipment

3.5.2.1 Equipment used for manufacturing operations of critical products not qualified or shows evidence of malfunctioning.

3.5.2.2 Evidence of potential contamination from faulty equipment.
3.5.2.3 Inappropriate equipment.

3.5.3 Personnel

3.5.3.1 Individuals in charge of Quality Control/Quality Assurance or Production do not hold a university degree or equivalent in a science subject related to the work being conducted and do not have sufficient training and practical experience in their area of responsibility.

3.5.4 Sanitation

3.5.4.1 Evidence of widespread accumulation of residues/extraneous matter indicative of inadequate cleaning.
3.5.4.2 Evidence of gross infestation.

3.5.5 Raw material testing

3.5.5.1 Evidence of falsification or misrepresentation of analytical results.
3.5.5.2 No evidence of certificate of analysis (CoA) available from the supplier.

3.5.6 Manufacturing control

3.5.6.1 No written Composition of Immunological Products.
3.5.6.2 Manufacturing batch records showing gross deviations or significant calculation errors.
3.5.6.3 Culture vessels not properly cleaned between use leading to cross contamination.
3.5.6.4 Inappropriate status labelling and identification of materials in production area.
3.5.6.5 Lack of proper controls in handling starting materials, in-process bulk materials and materials in quarantine or rejected areas.

3.5.7 Quality Assurance Department

3.5.7.1 No full-time person in charge of QA.
3.5.7.2 QA department not a distinct and independent unit, lacking decisional power, with evidence that QC results are overruled by production department or management.
3.5.7.3 Poor quality control methods such as analytical methods used in the analysis of starting materials and finished products not being appropriate, analytical methods not validated, major equipment for analysis has no installation and/or operation qualification.

3.5.8 Finished Product Testing

3.5.8.1 Finished product not tested for compliance with specifications by the manufacturer before release for sale.
3.5.8.2 Evidence of falsification or misrepresentation of testing results/forgery of CoA.

3.5.9 Records

3.5.9.1 Evidence of falsification or misrepresentation of records.

3.5.10 Stability

3.5.10.1 No data available to establish the shelf-life of products.
3.5.10.2 Evidence of falsification or misrepresentation of stability data.

3.5.11 Sterile Products

3.5.11.1 Critical sterilization cycle based on probability of survival of potential contaminants not validated.
3.5.11.2 Water for injection (WFI) systems not validated with evidence of problems such as microbial/endotoxin counts not within specifications.
3.5.11.3 No media fills performed to demonstrate the validity of aseptic filling operations.
3.5.11.4 No environmental monitoring during filling of aseptically filled products.
3.5.11.5 Aseptic filling operations maintained following unsatisfactory results obtained for media fills.
3.5.11.6 Batches failing initial sterility test released for sale on the basis of a second test without proper investigation.
3.5.11.7 Inadequate room classification for processing /filling operations.
3.5.11.8 Aseptic manufacturing suites under negative pressure compared to clean (C-D) areas. Clean (C-D) areas under negative pressure to unclassified areas.

3.6 Major Observations

3.6.1 Premises

3.6.1.1 Malfunctioning of the ventilation system that could result in possible localized or occasional cross-contamination.
3.6.1.2 Maintenance/periodic verification such as air filter replacement, monitoring of pressure differentials not performed.
3.6.1.3 Accessory supplies (steam, air, nitrogen, dust collection etc.) not qualified.
3.6.1.4 Heating Ventilation Air Conditioning (HVAC) and purified water (PW) system not qualified.

3.6.1.5 Temperature and humidity not controlled or monitored when necessary.
3.6.1.6 Damages to walls/ceilings immediately adjacent or above manufacturing areas or equipment where the product is exposed.
3.6.1.7 Non-cleanable surfaces created by pipes, fixtures or ducts directly above products or manufacturing equipment.
3.6.1.8 Surface finish (floors, walls, ceilings) that do not permit effective cleaning.*
3.6.1.9 Unsealed porous finish in manufacturing areas with evidence of contamination (e.g.mould).*
3.6.1.10 Insufficient manufacturing space that could lead to incorrect activities.*
3.6.1.11 Quarantine areas accessible to unauthorized personnel and not well marked.*
3.6.1.12 No separate area/insufficient precautions to prevent contamination or cross-contamination during Raw Material sampling.

3.6.2 Equipment

3.6.2.1 Equipment does not operate within its specifications.*
3.6.2.2 Equipment used for complex manufacturing operation not qualified.
3.6.2.3 Clean in place (CIP) equipment not validated.
3.6.2.4 Inappropriate equipment for production: surfaces porous and non-cleanable/material shed particles.*
3.6.2.5 Equipment location does not prevent cross-contamination or incorrect use where different operations are performed in a common area.
3.6.2.6 Purified Water (PW) not maintained or operated to provide water of adequate quality.*
3.6.2.7 Leaking gaskets.
3.6.2.8 No calibration programme for measuring equipment /no records maintained.*
3.6.2.9 No equipment usage logs.

3.6.3 Personnel

3.6.3.1 Delegation of responsibilities for QC or production to insufficiently trained/qualified persons.
3.6.3.2 Insufficiently trained personnel in QC or production resulting in a high possibility of error.
3.6.3.3 Insufficient training for personnel involved in production and QC resulting in related GMP violations.

3.6.4 Sanitation

3.6.4.1 Sanitation programme not in writing but premises in acceptable state of cleanliness.

3.6.4.2 No Standard Operating Procedure (SOP) for microbial/environmental monitoring; no action limits for areas where susceptible products are manufactured.
3.6.4.3 Cleaning programme for production equipment not validated (including analytical methods).

3.6.5 Raw Material (RM) Testing

3.6.5.1 Water used in the formulation is not of acceptable quality.
3.6.5.2 No testing done on materials by the manufacturer where appropriate.
3.6.5.3 COA showing incomplete testing.
3.6.5.4 Incomplete specifications.
3.6.5.5 Specifications not approved by QC.
3.6.5.6 Testing methods not validated.
3.6.5.7 Use of materials after retest date without retesting.
3.6.5.8 Multiple lots comprising one consignment not considered as separate for sampling, testing and release.
3.6.5.9 No SOP for conditions of transportation and storage.

3.6.6 Manufacturing Control

3.6.6.1 Documented production process prepared/verified by unqualified persons.
3.6.6.2 Deviations from instructions during production not documented and not approved.
3.6.6.3 Discrepancies in yield or reconciliation following production not investigated.
3.6.6.4 Cleaning of vessels between production of different products not covered by SOP and not documented.
3.6.6.5 No regular checks for measuring devices/no records.
3.6.6.6 Lack of proper identification of antigens/in-process materials and products resulting in a high probability of errors.
3.6.6.7 Inadequate labelling /storage of rejected materials and products that could generate errors.
3.6.6.8 Upon receipt, raw materials and packaging materials not held in quarantine until released by QC.
3.6.6.9 Production personnel using RM and packaging materials without prior authorization by QC.*
3.6.6.10 Inadequate/inaccurate labelling of raw materials and packaging materials (PM).
3.6.6.11 Raw materials dispensing not done by qualified persons, according to SOP.

3.6.6.12 Production process description is incomplete or showing inaccuracies in the processing operations.
3.6.6.13 Changes in batch size not authorised by qualified personnel.
3.6.6.14 Inaccurate/incomplete information in manufacturing/ packaging batch records.
3.6.6.15 No written procedures for packaging operations.
3.6.6.16 Non-standard occurrences during packaging not investigated by qualified personnel.
3.6.6.17 Inadequate control of coded and non-coded printed PM (including storage, dispensing, printing and disposal).
3.6.6.18 No or inadequate self-inspection programme addressing all applicable sections of GMPs i.e records incomplete or not maintained.

3.6.7 Recall

3.6.7.1 Absence of recall procedure combined with distribution practices that would not permit an adequate recall (distribution records unavailable or not kept).
3.6.7.2 Improper quarantine and disposal practices that would allow recalled/rejected units to be returned for sale.

3.6.8 Quality Control/Quality Assurance Departments

3.6.8.1 Inadequate facilities, personnel and testing equipment.
3.6.8.2 No authority for QC/QA personnel to enter production areas.*
3.6.8.3 No SOP approved and available for sampling, inspection and testing of materials.
3.6.8.4 Products made available for sale without approval of QA department.*
3.6.8.5 Products released for sale by QA without proper verification of manufacturing and packaging documentation.
3.6.8.6 Deviations and borderline conformances not properly investigated and documented, according to an SOP.
3.6.8.7 Raw materials and packaging materials used in production without prior approval of QA.
3.6.8.8 Reprocessing/Reworking done without prior approval of QA.*
3.6.8.9 No system for complaint handling and returned goods.
3.6.8.10 SOPs covering operations that can affect the quality of a product such as transportation, storage etc. not approved by QA / not implemented.
3.6.8.11 Absence of a change control system.
3.6.8.12 The systems and controls in place for the proper qualification, operation, calibration and maintenance of equipment, standards, solutions, and records keeping do not assure that the results and conclusions generated are accurate, precise and reliable.

3.6.9 Packaging Material Testing

3.6.9.1 Absence of testing of packaging materials.
3.6.9.2 Specifications not approved by QC.

3.6.10 Finished Product Testing

3.6.10.1 Incomplete/inadequate specifications.
3.6.10.2 Finished products specifications not approved by QC.
3.6.10.3 Incomplete testing.
3.6.10.4 Test methods not validated.

3.6.11 Records

3.6.11.1 Absence of Batch Manufacturing records.
3.6.11.2 Lack of standard operating procedures for the operations undertaken.

3.6.12 Samples

3.6.12.1 Retention samples of finished products not kept.

3.6.13 Stability

3.6.13.1 Insufficient number of batches/insufficient data to establish shelf life.
3.6.13.2 No action taken when data shows that the products do not meet the planned stability indicating specifications prior to the expiry date.
3.6.13.3 No stability studies pertaining to approved changes in manufacturing (formulation) or packaging materials.
3.6.13.4 Testing methods not validated.

*May be elevated to critical observation

3.7 Minor Observations

3.7.1 Premises

3.7.1.1 Doors giving direct access to exterior from manufacturing and packaging areas used by personnel.
3.7.1.2 Un-screened/un-trapped floor drains.
3.7.1.3 Outlets for liquids and gases not identified.
3.7.1.4 Damages to surfaces not directly adjacent or above exposed products.
3.7.1.5 Non-production activities performed in production areas.
3.7.1.6 Inadequate rest, change, wash-up and toilet facilities.

3.7.2 Equipment

3.7.2.1 Insufficient space between equipment and walls to permit cleaning.
3.7.2.2 Base of immovable equipment not adequately sealed at points of contact.
3.7.2.3 Use of temporary means or devices for repair.
3.7.2.4 Defective or unused equipment used for non-critical products not qualified.

3.7.3 Sanitation

3.7.3.1 Incomplete written sanitation programme although premises in acceptable state of cleanliness.

3.7.3.2 Sanitation or Health and hygiene programmes not properly implemented or followed by employees.

3.7.4 Raw Material Testing

3.7.4.1 Incomplete validation of test methods.

3.7.5 Manufacturing Control

3.7.5.1 Incomplete SOPs for handling of materials and products.
3.7.5.2 Access to production areas not restricted to authorised personnel.
3.7.5.3 Inadequate checks for incoming materials.
3.7.5.4 Written procedures incomplete for packaging operations.
3.7.5.5 Incomplete recall procedure.

3.7.6 Packaging Material Testing

3.7.6.1 Inadequate procedures of transportation and storage.
3.7.6.2 Inadequate handling of outdated/obsolete packaging materials.
3.7.6.3 Incomplete testing.
3.7.6.4 Inadequate specifications.

3.7.7 Finished Product Testing

3.7.7.1 Incomplete testing of physical parameters.

3.7.8 Records

3.7.8.1 Incomplete records/documentation for a product.
3.7.8.2 Incomplete plans and specification for the manufacturing buildings.
3.7.8.3 Incomplete documentation pertaining to supervisory personnel.
3.7.8.4 Insufficient retention time for evidence and records to be maintained.
3.7.8.5 No organograms.
3.7.8.6 Incomplete records for the cleaning programme.

3.7.9 Samples

3.7.9.1 Samples of raw materials not available.
3.7.9.2 Incomplete testing parameters.
3.7.9.3 Improper storage conditions.

3.7.10 Stability

3.7.10.1 Insufficient number of batches in continuing stability programme.
3.7.10.2 Incomplete testing parameters.
3.7.10.3 Improper storage conditions.

Appendix 8: PROCEDURE FOR PREPARING AND REVIEWING A GMP INSPECTION REPORT

1.0 PURPOSE

The purpose of this document is to guide GMP inspectors and Peer review committees on how to prepare and review an inspection report respectively.

2.0 SCOPE

The scope of this SOP applies to the preparation and review of the GMP inspections reports of manufacturers of IVPs applied within the EAC Partner States.

3.0 RESPONSIBILITY

3.9 Head of NMRAs
3.10 Head GMP department
3.11 Lead Inspectors
3.12 GMP inspectors
3.13 Peer review committees

4.0 DISTRIBUTION LIST

4.1 Head of NMRAs
4.2 Head of GMP departments
4.3 NMROs
4.4 Quality assurance departments
4.5 Peer review committees

5.0 PROCEDURES

5.1 PREPARING A GMP INSPECTION REPORT

5.1.1 The GMP inspection report shall be in Times Roman 12; line spacing 1.5 and in the format attached herewith. It shall comprise the sections indicated in **Appendix 6**. The inspection reports should be written in 3rd person passive style and in the past tense.

5.1.2 GMP audit reports should be written before a team proceeds to inspect the next manufacturing facility.

5.1.3 The inspection team shall collectively prepare and agree upon the final GMP inspection report. Any differences of opinion should be resolved by discussion.

5.1.4 The Lead Inspector assisted by the other inspector (s), must prepare an exit inspection report using the relevant template, see Appendix 6. The inspectors and the inspected company should agree upon the findings and sign the exit inspection report. Any differences of opinion should be resolved by discussion and reevaluation of the finding in question. In case of any objection to sign the exit inspection report, the lead inspector should note this on the report

5.1.5 To prepare a GMP report, consider the documented information in the site master file, product dossier, inspection checklist, notebook, inspection exit report, and any other document as may be necessary

5.1.6 The GMP inspection report should be balanced, unbiased and factual. It shall be detailed enough to enable GMP peer review technical team make an informed opinion of the recommendation made by the inspectors. The observations should be referenced to the relevant applicable clause in the EAC GMP guideline. An observation that can't be reasonably referenced should not be listed as an observation.

5.1.7 Where more than one observation relate to the same basic quality system failure, they should be grouped and listed as a single observation, under a heading that reflects the basic system failure.

5.1.8 The observations identified shall be classified according to Appendix 7.

5.1.9 The inspection team should prepare finalize, sign and submit the final GMP Inspection report within fourteen (14) working days after the date of return to office.

5.1.10 All inspection team members should sign the inspection report.

5.1.11 The Lead Inspector shall submit the inspection reports to the Head GMP Inspectorate /division

5.1.12 The Head of GMP Inspectorate shall circulate copies of the report to every member of the GMP peer review technical team within seven (7) days before discussion of report.

5.2 REVIEWS AND APPROVAL OF THE GMP INSPECTION REPORT

5.2.1 The GMP peer review technical team, procedurally selected, shall read the reports, assess their text, context and facts and agree or disagree with the recommendations of the GMP audit team. The head of inspection to convene a meeting to discuss and approve the inspection report.

5.2.2 The signed report must then be scanned and emailed by the Head of the NMRA to the applicant and/ or contact person in the manufacturing facility within forty five (45) days from the last day of the inspection. As necessary, the local technical representative may have a copy of the report.

5.2.3 Where the facility complies with current EAC GMP requirements, the respective NRAs will issue Certificate of Compliance

6.0 RECORD KEEPING

6.1 The GMP department/Unit/Division shall keep both an electronic copy and hard copy of the reports in PDF or any other protected format in a designated folder and prepare the certificates or cover letters of non-compliance or approval as per the GMP Inspection

6.2 The GMP inspection outcomes shall be shared with the medicine registration, medicine quality control and medicine information department and other NRAs in the EAC.