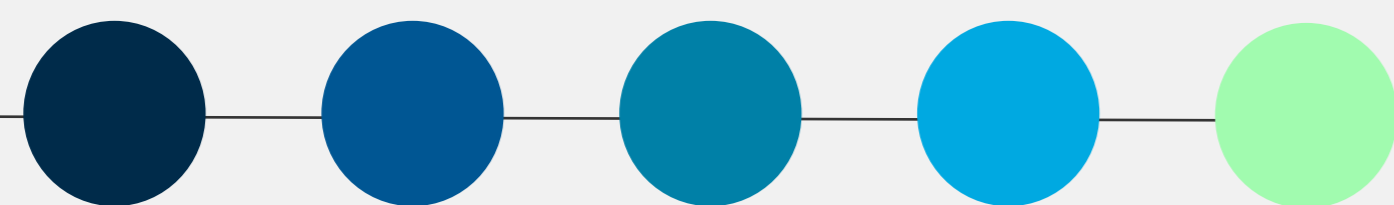


ANVISA and the Brazilian Medicine Inspection System

Andrea Geyer, PhD

Office of Medicine and API Inspection - GIMED

Inspection General Office – GGFIS



Tokyo, November 16th, 2019



ANVISA

Brazilian Health Regulatory Agency

Brazilian Pharmaceutical Market in Numbers

Year of Reference: 2018



- Worth U\$ 23,24 Bi
- Is the 7th World Biggest Market
- Exported U\$ 1,008,42.00
- Imported U\$ 6,896,55.00



ANVISA's Engagement on International Regulatory Convergence Initiatives



Member since 2012:
Better collaboration
among Regulations.



Active participation on:

- . WHA;
- . Working Groups;
- . Share non-public information
(confidential agreement)



List of third
countries with a
regulatory
framework
applicable API
equivalent to that
in the Union, since
2015



Member since 2016:
Update of regulatory
Framework;
Participation on new
guidelines.



In the process of
adhesion.
Expectation to
become member in
2020

Programme to rationalise international GMP inspections of
active pharmaceutical ingredients/active substances
manufacturers

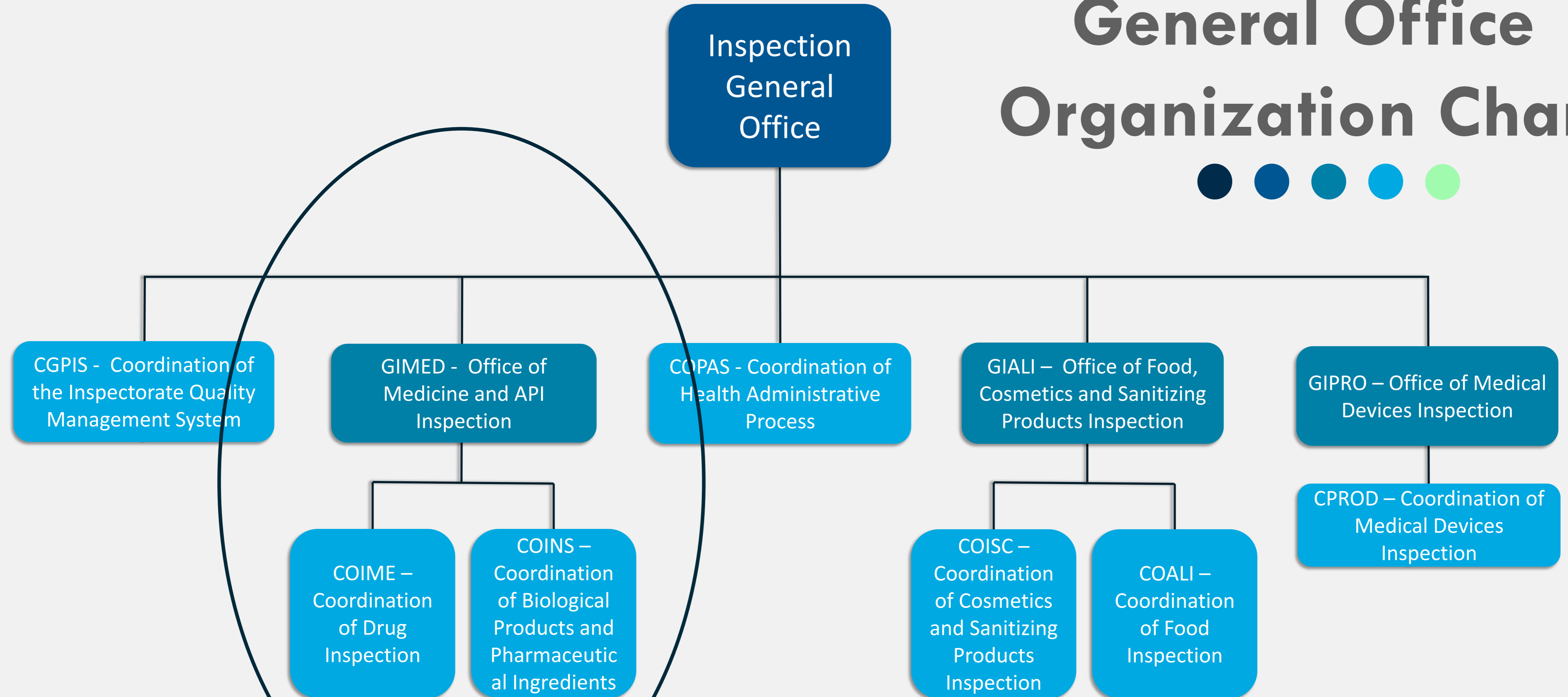
Anvisa requested
adhesion.
Expectation to share
and receive GMP
inspection information,
participate at joint
inspection.



ANVISA

Brazilian Health Regulatory Agency

Inspection General Office Organization Chart

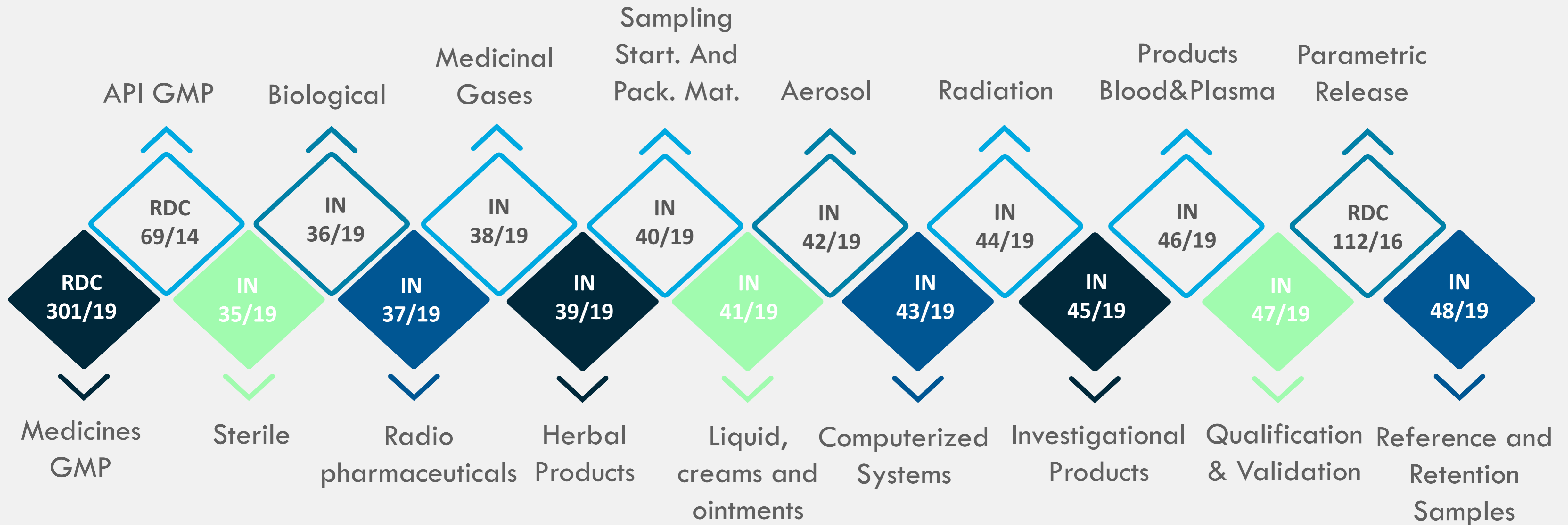


ANVISA

Brazilian Health Regulatory Agency

Regulation on Good Manufacturing Practices


Equivalent/Translation from PIC/S Guidelines



ANVISA

Brazilian Health Regulatory Agency

Risk Based Inspection Scheduling Procedures



PHARMACEUTICAL INSPECTION CONVENTION
PHARMACEUTICAL INSPECTION CO-OPERATION SCHEME

PI 037-1
2 Appendices
1 January 2012

RECOMMENDATION

**A RECOMMENDED MODEL FOR
RISK-BASED INSPECTION
PLANNING IN THE GMP ENVIRONMENT**

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Editor: PIC/S Secretariat
e-mail: info@picscheme.org
web site: <http://www.picscheme.org>

PI 037-1 Page 1 of 17

Annex 9

Guidance on good practices for desk assessment of compliance with good manufacturing practices, good laboratory practices and good clinical practices for medical products regulatory decisions

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WHO Drug Information Vol. 31, No. 2, 2017

Medicines regulation

Regulating medicine manufacturers: is an on-site inspection the only option?

The Australian approach to meeting inspection demands

On-site inspections of manufacturing and testing resource-intensive for both regulators and manufacturers. An increasing number of sites are located outside regulatory jurisdiction. To maximize the impact of limited resources, it is important to use all available evidence from other sources to inform the inspection process. The Australian Department of Health's Therapeutic Goods Administration is using a risk- and reliance-based approach to site selection. This article describes the TGA's practice (GMP) clearance.

Pharmaceuticals are a critical part of medicine that the medicines market meet appropriate needs. At this end, a national regulatory authority (NRA) will assess applications during pre-market review. This involves the NRA reviewing data provided as part of the dossier (1) by the manufacturer. The site inspection of the manufacturer against compliance with Good Manufacturing Practice (GMP) standards, such as those used in its manufacturing process (2,3) or those of the International Conference on Harmonisation/Pharmaceutical Inspection Convention/Pharmaceutical Inspection Cooperation Scheme (PIC/S) are used to prevent risks to public health. A risk-based approach to site selection is used to prevent risks to public health. A risk-based approach to site selection is used to prevent risks to public health.

Harry Rothenfluh
Branch, Therapeutic Goods Administration

MANUAL OF POLICIES AND PROCEDURES
CENTER FOR DRUG EVALUATION AND RESEARCH

PROGRAM DESCRIPTION

Office of Pharmaceutical Quality

Understanding CDER's Risk-Based Site Selection Model

Table of Contents

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RESPONSIBILITIES	5
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PURPOSE

This MAPP outlines the policies and procedures for the Site Selection Model (SSM) by CDER staff to prioritize manufacturing sites for routine quality-related (current manufacturing practice (CGMP)) surveillance inspections.

BACKGROUND

- FDA implemented the risk-based approach to prioritizing human drug manufacturing sites for routine CGMP surveillance inspection in FY2005. It was one of many outcomes from the initiative *Pharmaceutical Quality for the 21st Century – A Risk-Based Approach*. The FY2005 SSM replaced the previous approach, which was primarily based on the biennial inspection frequency for domestic sites as previously established in section 510(h) of the Federal Food, Drug, and Cosmetic Act (FD&C Act).
- The Food and Drug Administration Safety and Innovation Act (FDASIA) of 2012 amended section 510(h) of the FD&C Act, replacing the fixed minimum inspection interval for domestic establishments (i.e., sites) with the requirement that FDA inspect domestic and foreign drug establishments “in accordance with a risk-based schedule” that considers establishments’ “known safety risks.” This defined a risk-based inspection frequency for all sites, regardless of location, to promote parity in inspectional coverage and the effective and efficient use of FDA resources to address the most significant public health risks. The statutory change

Originating Office: Office of Pharmaceutical Quality
Effective Date: 9/26/18

Page 1 of 7



EUROPEAN COMMISSION
HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL
Public Health and Risk Assessment
Pharmaceuticals



27 June 2013
EMA/385898/2013 Rev 16
Compliance and Inspection

Compilation of Community Procedures on Inspections and Exchange of Information

This document forms part of the Compilation of Community Procedures on Inspections and Exchange of Information. Please check for updates on the European Medicines Agency's website.

Published in Agreement with the European Commission by the European Medicines Agency

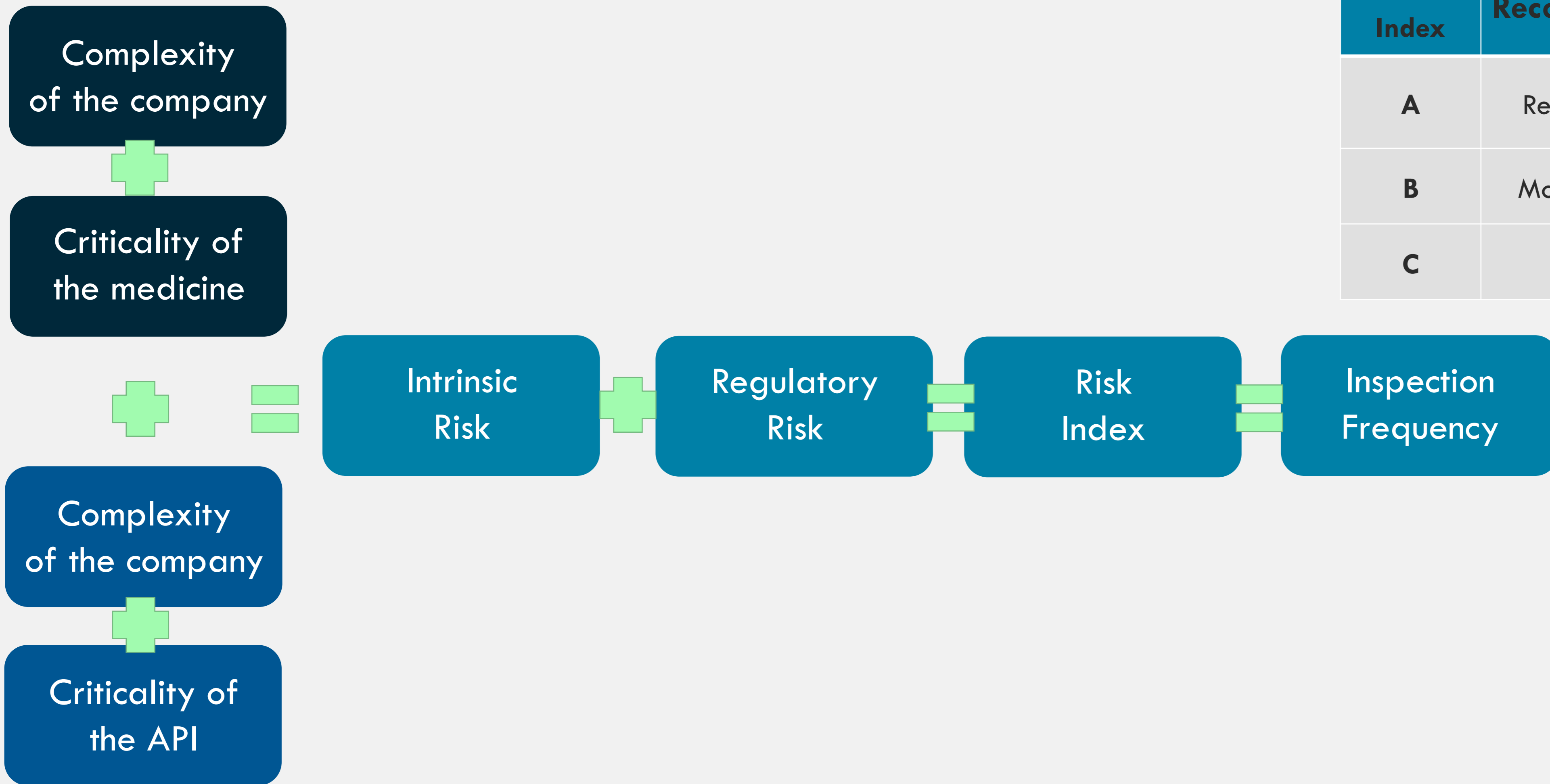
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E-mail info@ema.europa.eu Website www.ema.europa.eu

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Risk Based Inspection Scheduling Procedures (National Inspections)

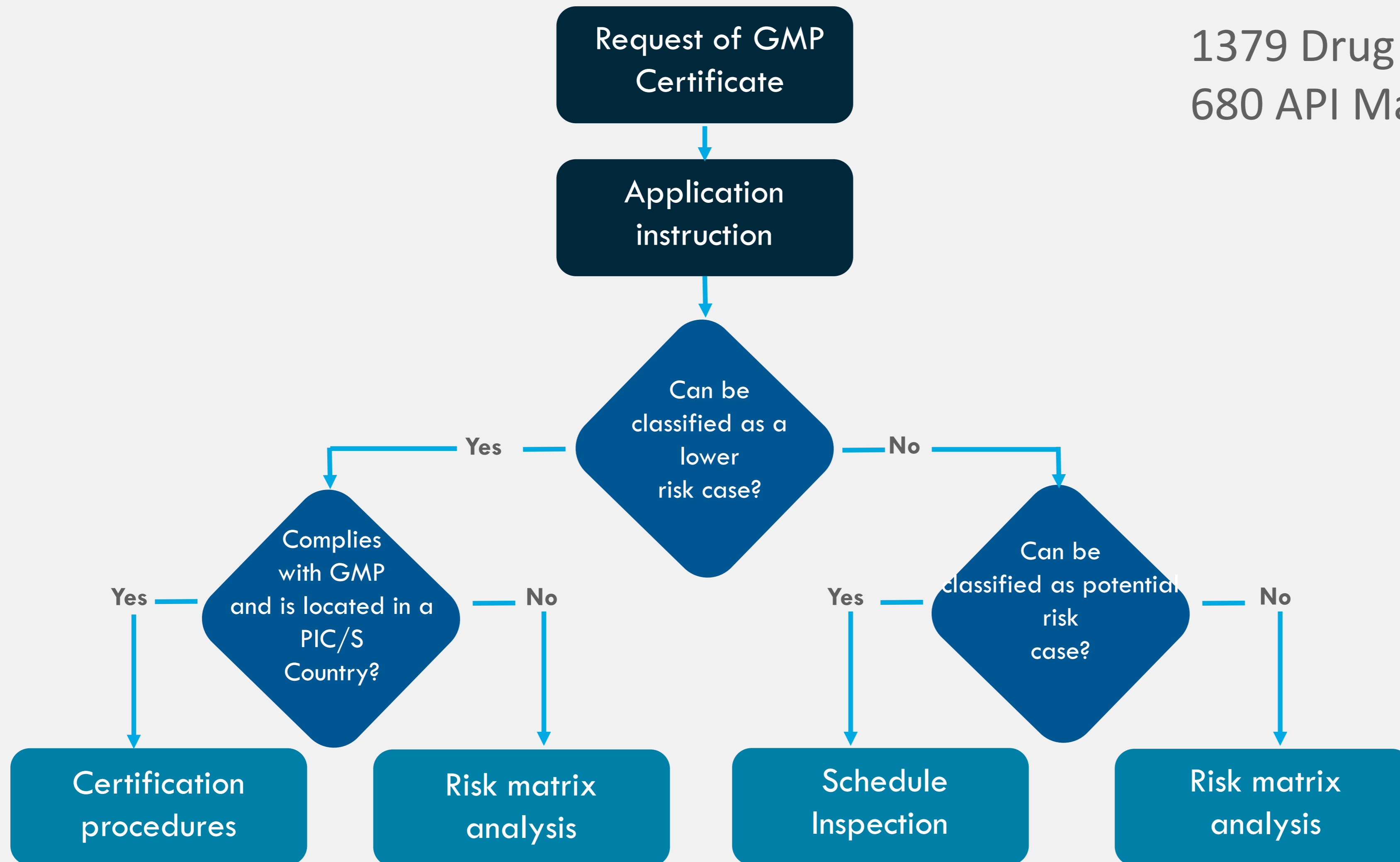


Risk Index	Recommended Inspection Frequency
A	Reduced Frequency (24 to 36 months)
B	Moderate Frequency (12 to 24 months)
C	Intensive Frequency(≤ 12 months)

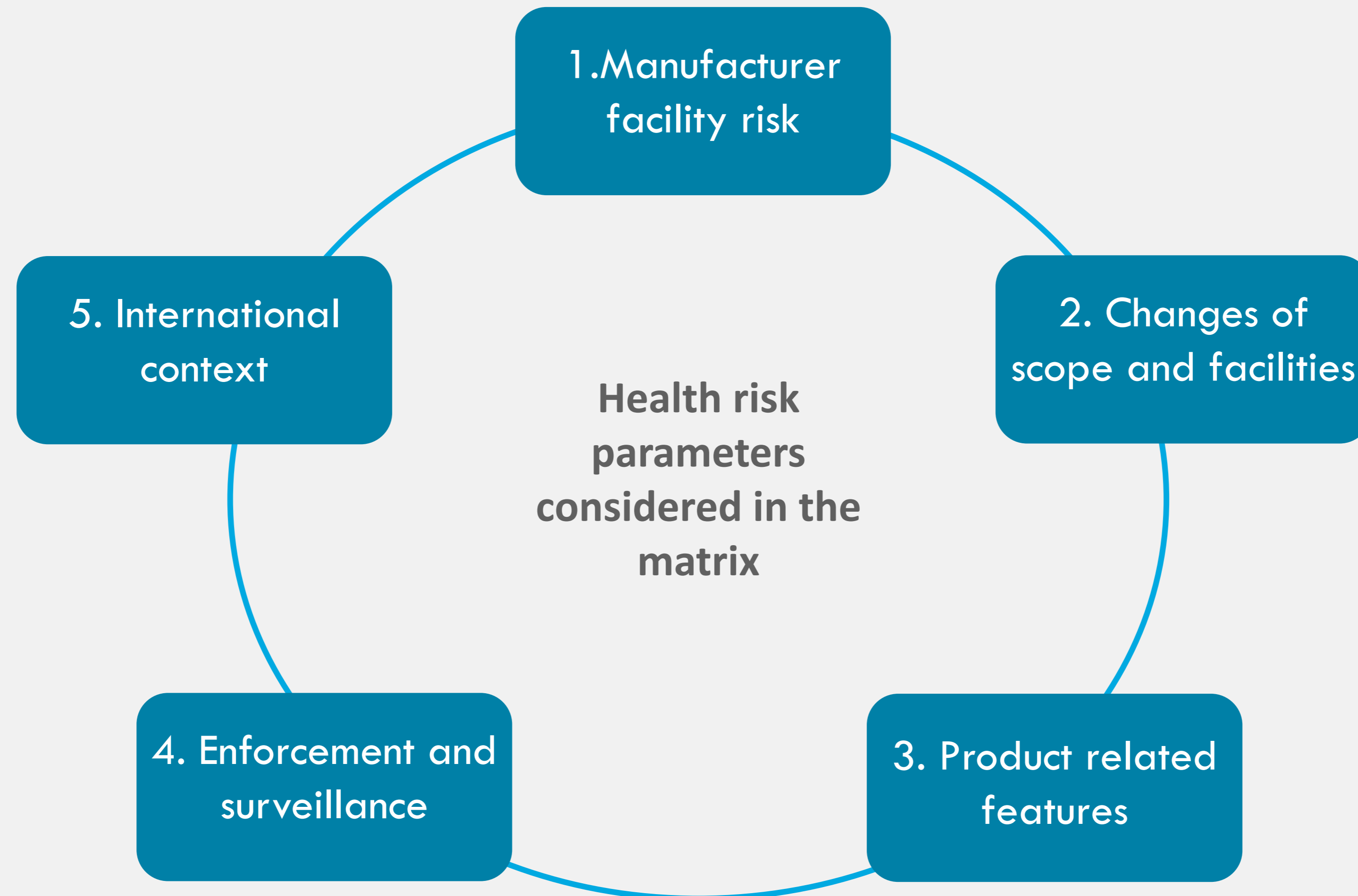


Risk Based Inspection Scheduling Procedures Foreign Companies

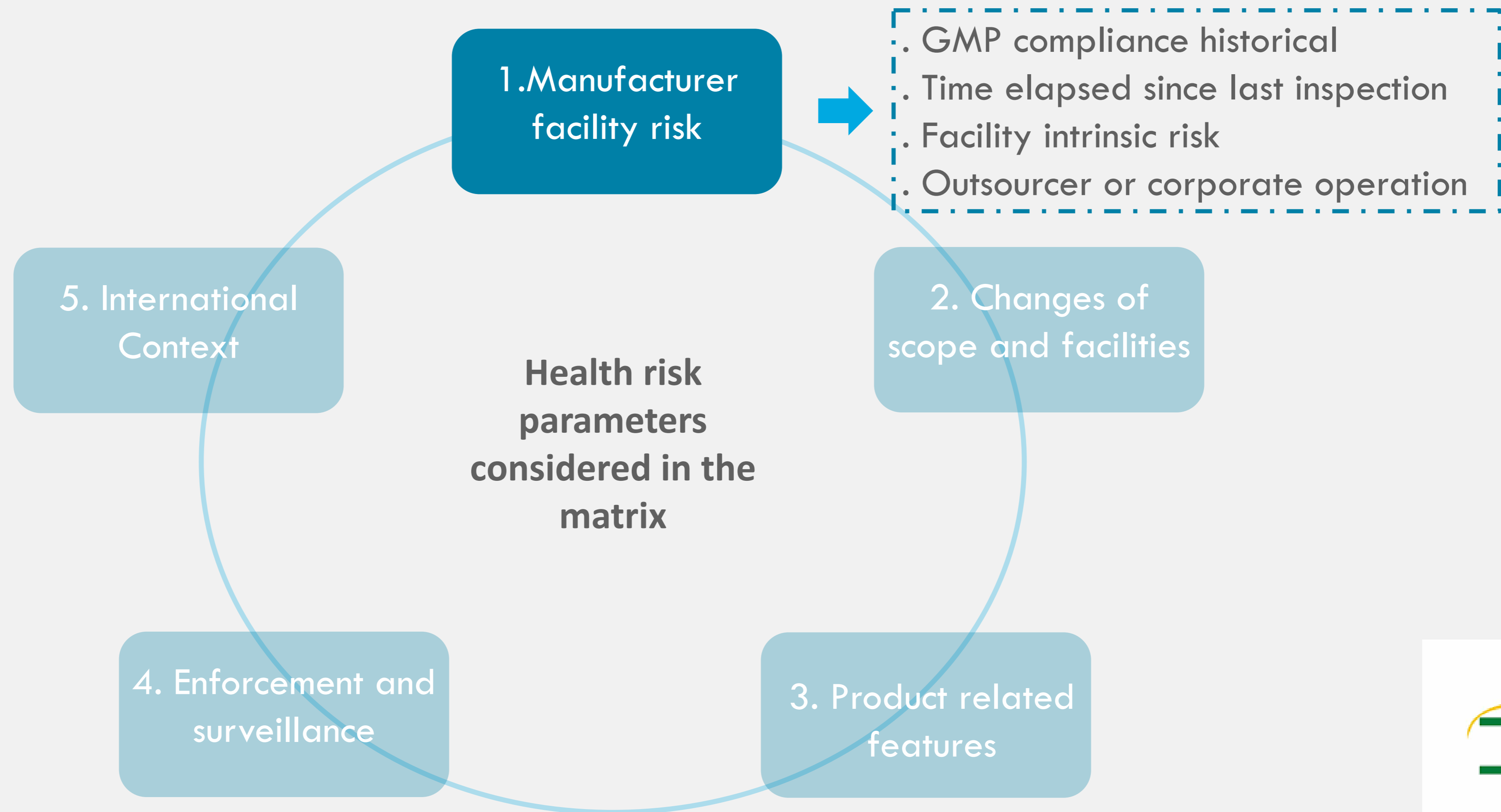
1379 Drug Manufacturers
680 API Manufacturers



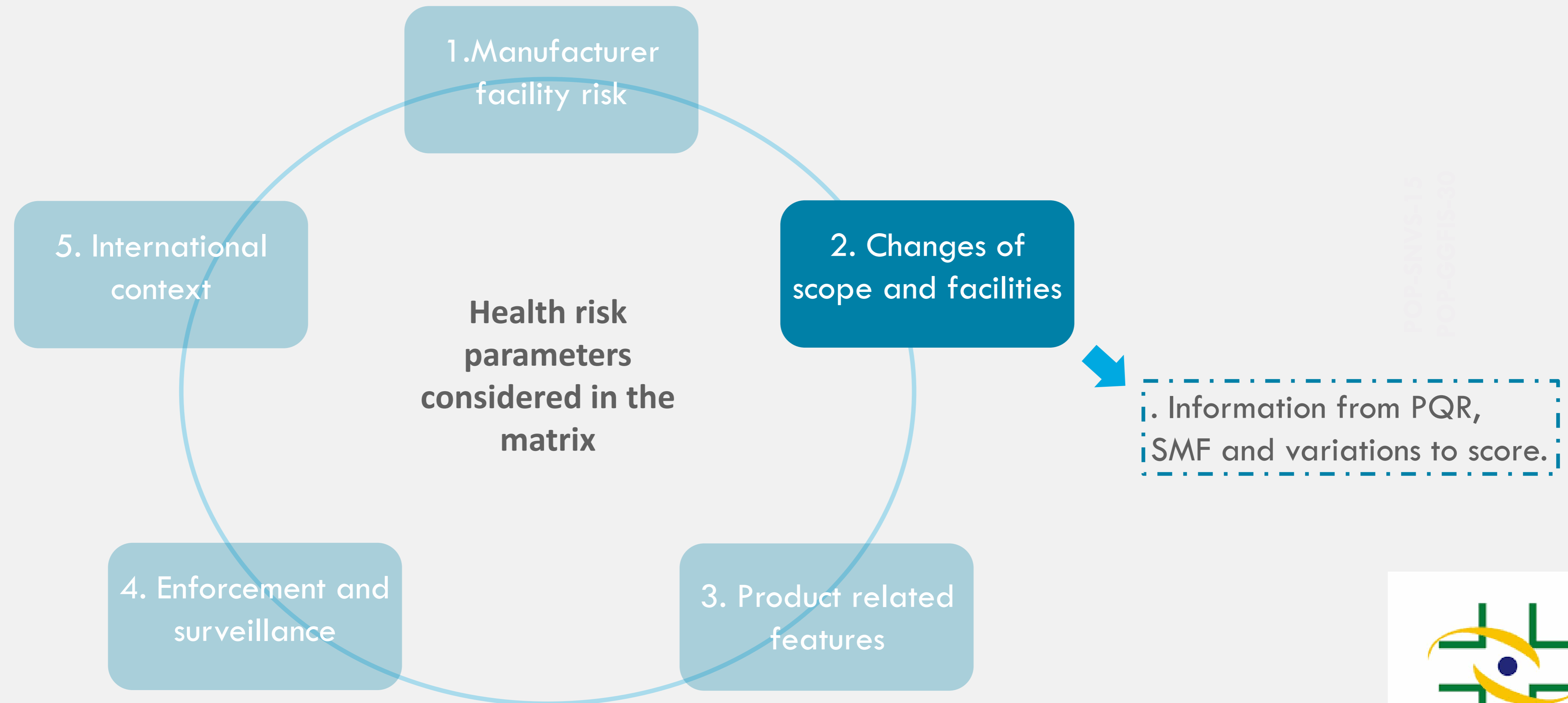
Risk Based Inspection Scheduling Procedures



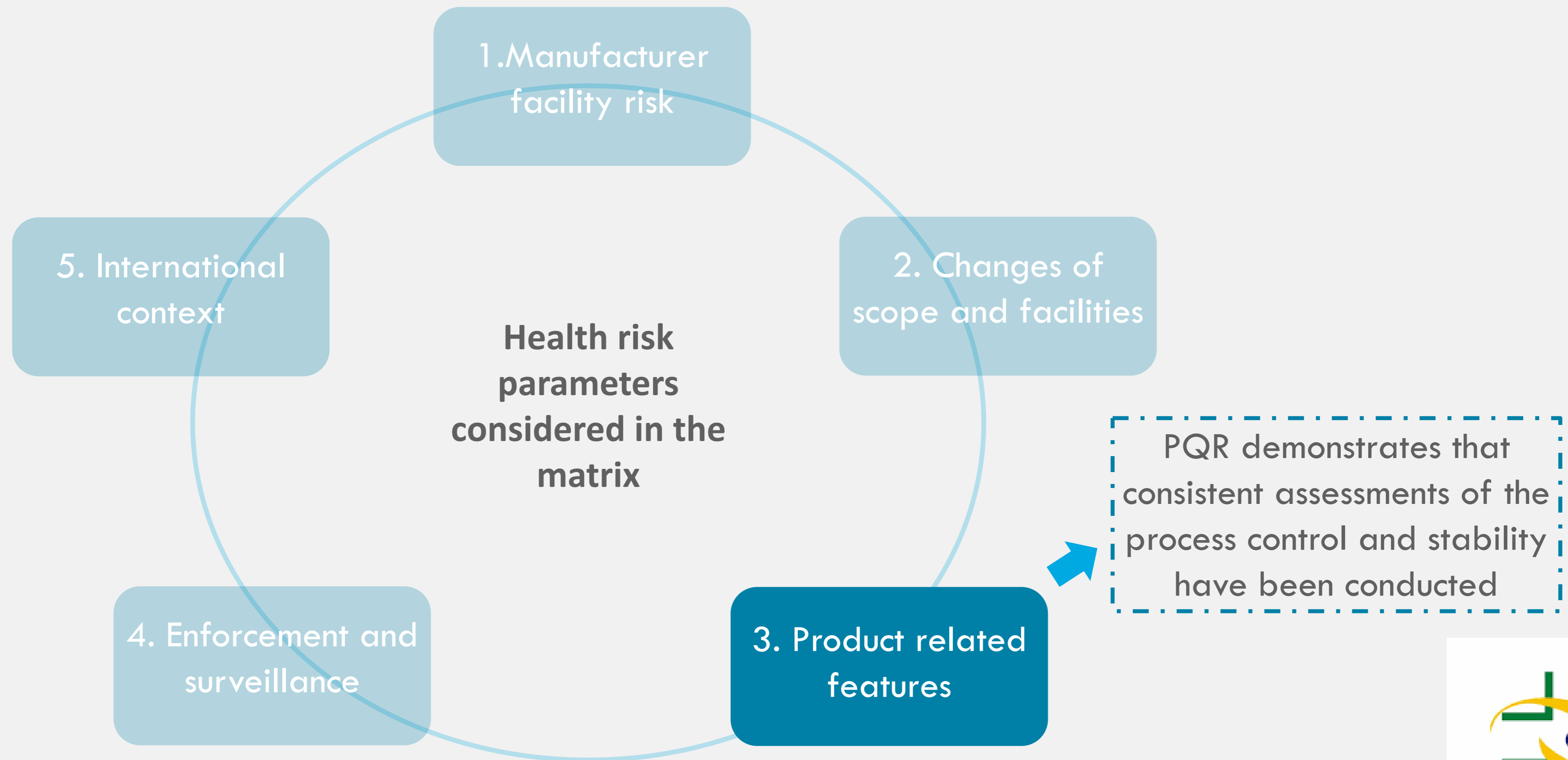
Risk Based Inspection Scheduling Procedures



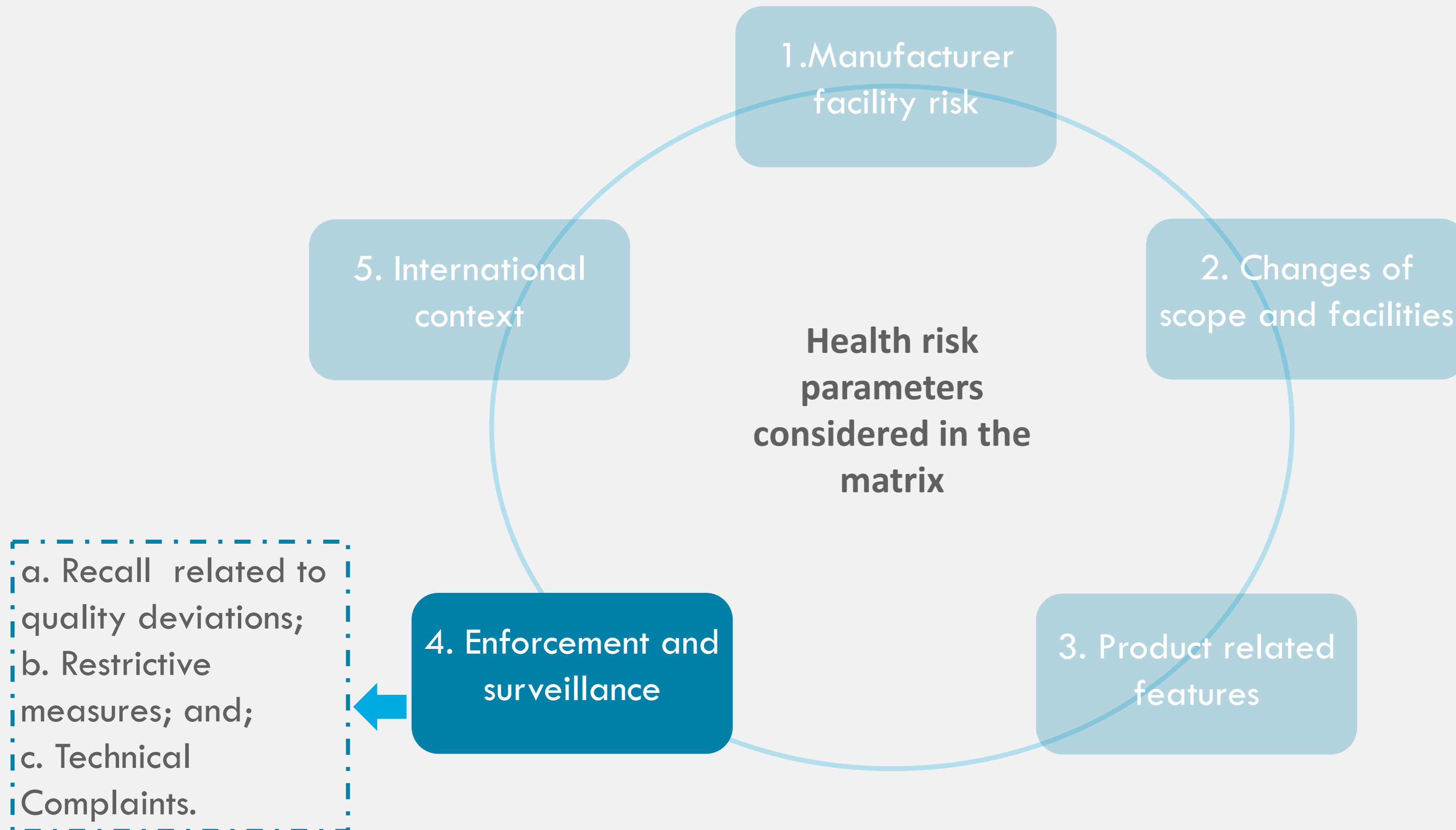
Risk Based Inspection Scheduling Procedures



Risk Based Inspection Scheduling Procedures



Risk Based Inspection Scheduling Procedures

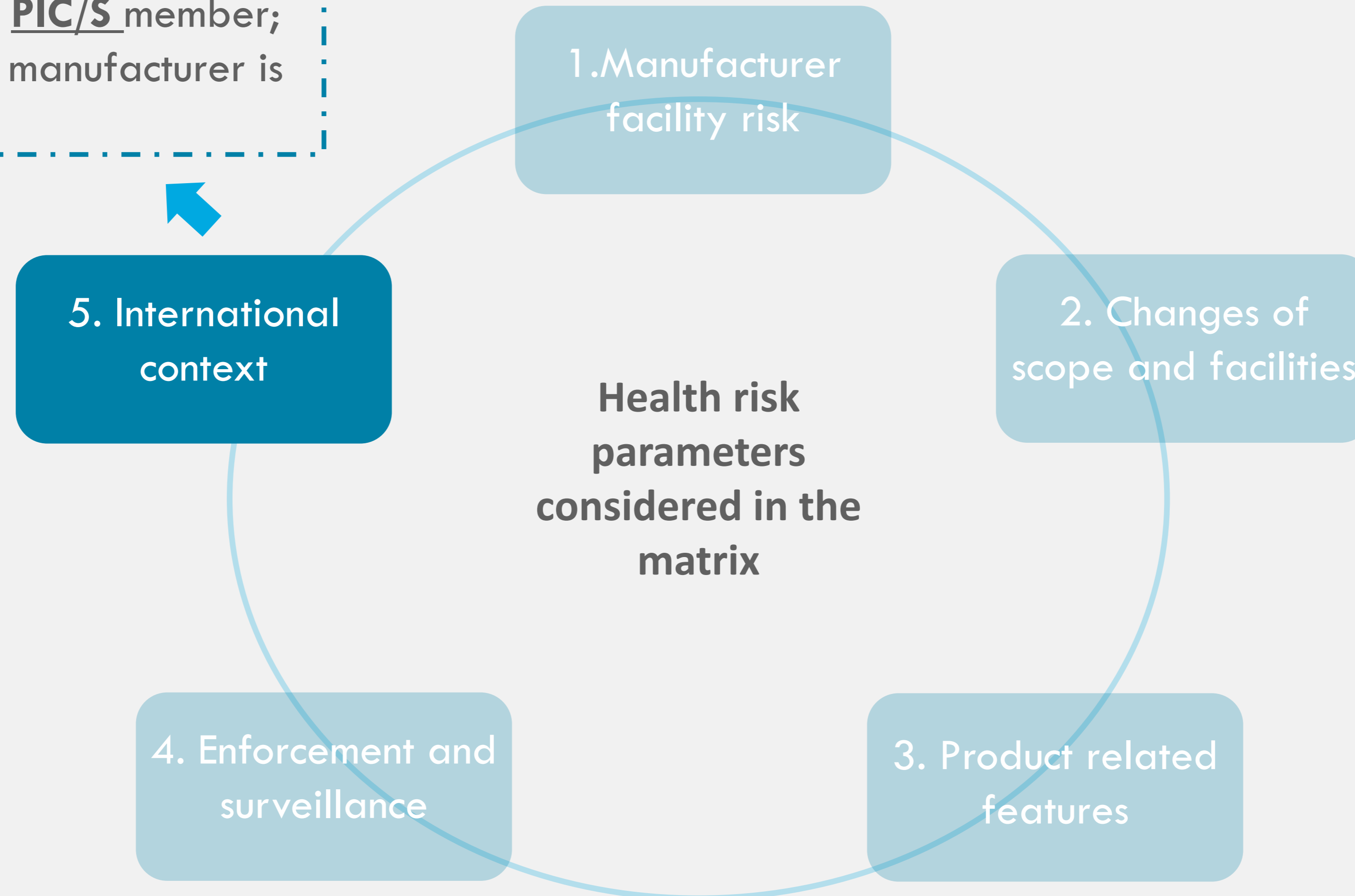


POP-05/ANVISA/015
POP-06/ANVISA/010



Risk Based Inspection Scheduling Procedures

- a. Historical data of inspections by MRAs of reference;
- b. Certification issued by **PIC/S** member;
- c. Country risk where the manufacturer is located.

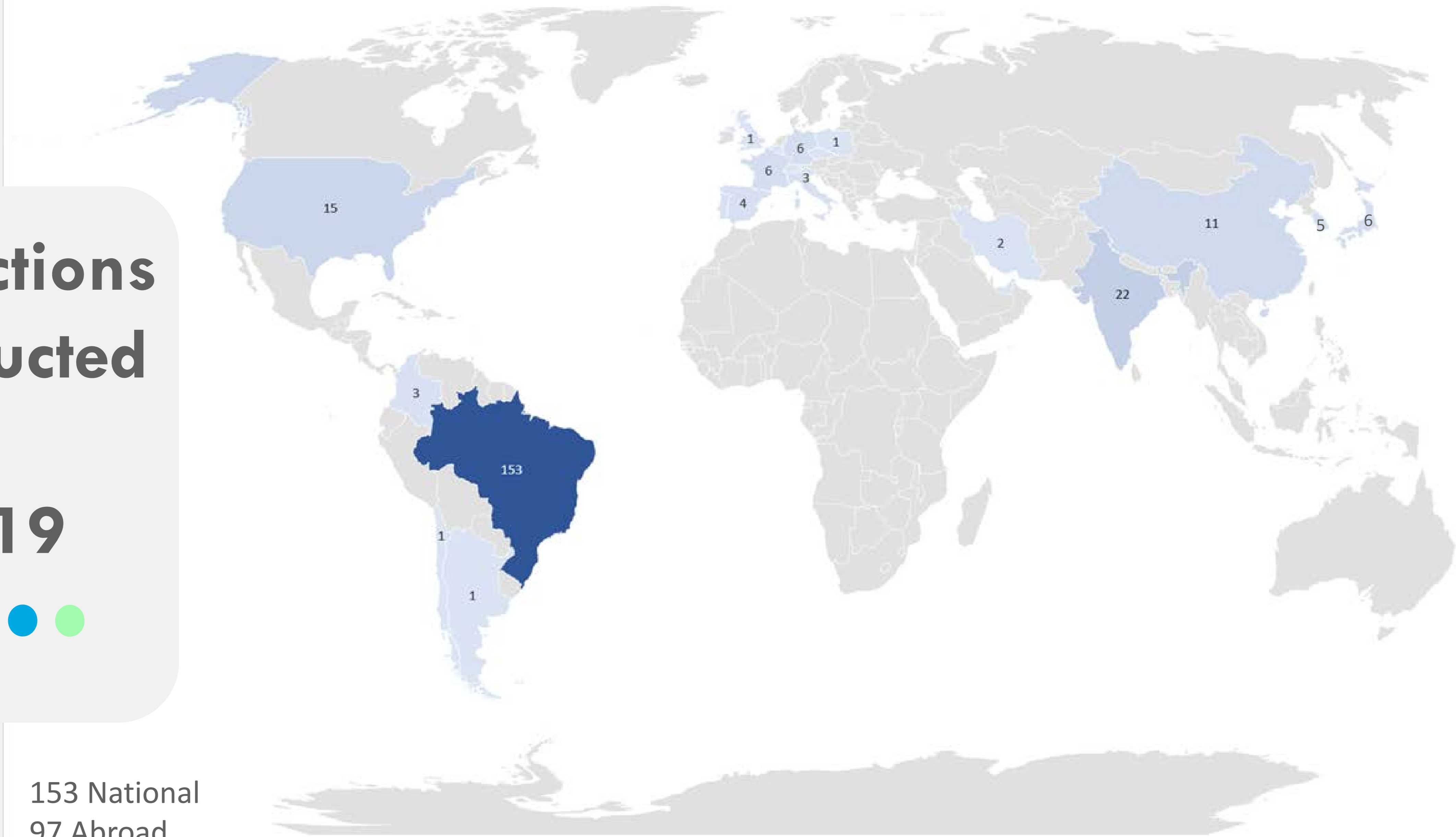


Inspections Conducted

2019



153 National
97 Abroad



DEFICIENCY CLASSIFICATION

Critical

- Generated or leads to a significant risk of manufacturing a product that is dangerous to patients, or when it is detected fraud and misrepresentation, or falsification of data and/or products, or when combining different non-critical NCs that together can be explained in the report as a critical situation for the product.

Major

- Denotes that a product does not comply with its MA specifications, or does not represent the effective implementation of the required control measures in GMP, or indicates a serious breach of the other conditions stated in the MA, or which represents a failure related to batch release procedures;

Minor

- Cannot be classified as either critical or major, but is a deviation from the GMP



Inspection Flow

8.7. Da visão geral dos prazos aplicáveis

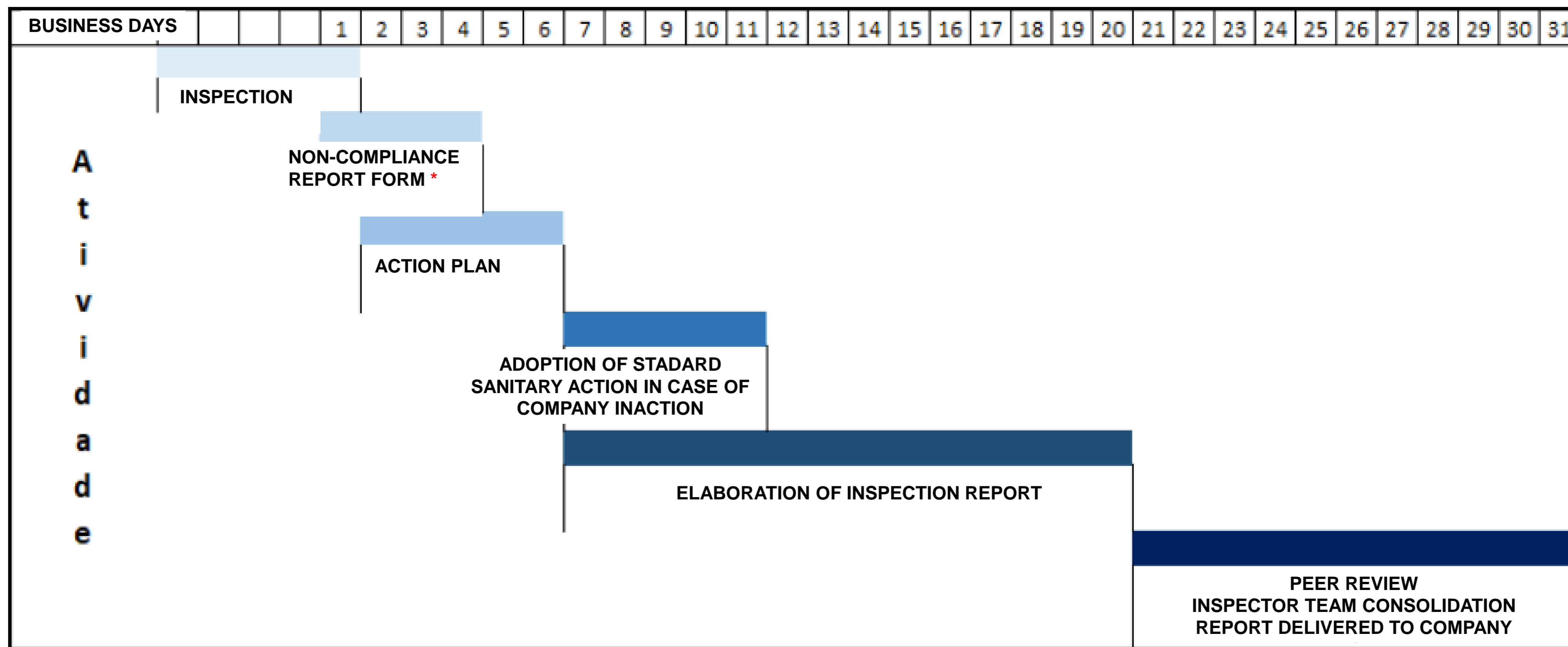


Figura 1 – Prazos aplicáveis a finalização do relatório após o término da inspeção

Company's overall compliance rating

POP-O-SNVS-014



NO ACTION INDICATED (SAI)

Immediate Certification **
all lines

Voluntary Action Indicated (AVI)

Certification **

Exclusion:
Pharmaceutical form *
Production Line *

Official Action Determined (AOD)

Certification ** / ***

Exclusion:
Pharmaceutical form *
Production Line *

**

For certification to occur, NCs that do not result in standardized sanitary action must have had satisfactory corrections and corrective actions.

*

All products (pharmaceutical form or line): object of restrictive market action after adoption of standard sanitary actions

Does not result in certification: AOD classification for the 2nd consecutive time; NC related to fraud, forgery, tampering.

RDC 39/2013

- Valid for 2 years since its publication.
- Published in the Government Official Journal www.in.gov.br
- Can be cancelled in case of marketing deviations or other significant events.
- Before expiration, the renewal may be requested to ANVISA.
- ANVISA will decide if another inspection will be needed based on a risk assessment

GMP CERTIFICATE



GMP Certificates:

<http://portal.anvisa.gov.br/consulta-certificado-boas-praticas>

portal.anvisa.gov.br/consulta-certificado-boas-praticas

BRASIL

Simplifique! Participe Acesso à informação Legislação Canais

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ACESSIBILIDADE ALTO CONTRASTE MAPA DO SITE

ENGLISH

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AGÊNCIA NACIONAL DE VIGILÂNCIA SANITÁRIA

Webmail

Perguntas Frequentes | Legislação | Contato | Serviços da Anvisa | Dados Abertos | Área de Imprensa

Buscar no portal

VOCÊ ESTÁ AQUI: PÁGINA INICIAL / SERVIÇOS DA ANVISA / CONSULTA CERTIFICADO BOAS PRÁTICAS

Consulte a situação de documentos

Peticionamento Eletrônico

Sistema Eletrônico de Informações (SEI)

SNGPC

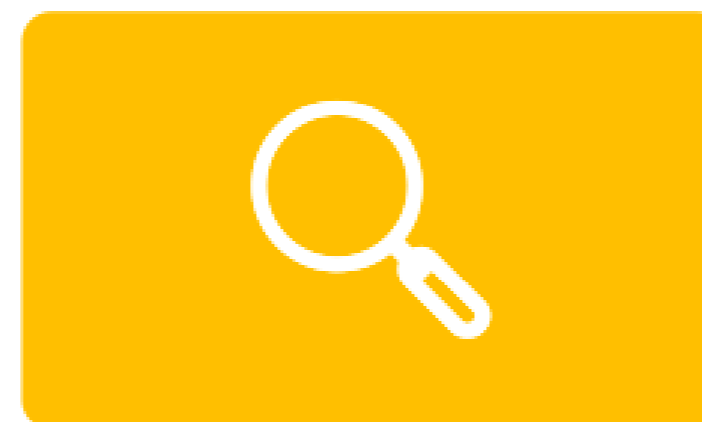
ATUAÇÃO

Regulamentação

Registros e Autorizações

Fiscalização e Monitoramento

Consulta de Certificado de Boas Práticas



Consulta de Certificado de Boas Práticas

Acessar:

[Medicamentos](#)

[Produtos para a saúde](#)

[Insumos farmacêuticos](#)

Objetivo

Consulte as empresas com certificado de boas práticas e filtre os resultados por estado, país, CNPJ, data de publicação, data de validade e outros itens



Drug Products
<https://consultas.anvisa.gov.br/#/certificados/>

https://consultas.anvisa.gov.br/#/certificados/

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ACESSIBILIDADE ALTO CONTRASTE MAPA DO SITE

Consultas

ANVISA - AGÊNCIA NACIONAL DE VIGILÂNCIA SANITÁRIA

Consultas / Certificado de Boas Práticas

Critérios para Consulta

CNPJ da Empresa Solicitante

Tipo de Certificado
 CBPF CBPDA

Período de Publicação do Certificado
Data Inicial Data final

Linha de CBPF

Classe Certificação

Liberação paramétrica
 Sim Não

Origem da Empresa Certificada
 Nacional Internacional

Período de Validade do Certificado
Data Inicial Data final

Formas Farmacêuticas



ありがとう

Thank you!

Obrigada!

Agência Nacional de Vigilância Sanitária - Anvisa
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