

Guide to Applications for a New Manufacturer's Authorisation



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INTRODUCTION

This document provides guidance on applying to the HPRa for a new manufacturer's authorisation.^{1,2}

The authorisation will be formatted into the agreed EU format included in the Compilation of Union Procedures on Inspections and Exchange of Information published by the European Medicines Agency on behalf of the European Commission. The Union Format for a Manufacturer's Authorisation and guidance from the associated interpretation document on this format have been used as the general basis for the guidance. This guidance applies to human and veterinary medicinal products (Annex 1) as well as to investigational medicinal products (IMPs) (Annex 2). The headings in Annex 2 are not included in this document but any specific guidance that applies to IMPs only is identified where necessary. Clarifying remarks are often important in helping to define the scope of a manufacturer's authorisation and are cross-referenced to the numbered items within the manufacturer's authorisation format as applicable.

As outlined in the table of contents, a number of sections of the manufacturing and importation Authorisation (MIA) have been described, such as the applicant details and the content of the appendices. These four appendices, available at the end of this document, provide detailed guidance on the supporting information required for the inclusion of contract sites based in MRA (mutual recognition agreement) partner territories (Appendix 1), on the import or supply of unlicensed/exempt medicinal products for the Irish market (Appendix 2), guidance regarding Qualified Person declarations (Appendix 3) and remote batch certification by the Qualified Person (Appendix 4).

ANNEXES OF THE EU FORMAT FOR A MANUFACTURER'S AUTHORISATION

Annex no.	Annex title	Notes
Annex 1	Scope of authorisation relating to medicinal products for human use or veterinary use	This describes manufacturing/importation/testing operations which are carried out directly under this authorisation only. Contracted manufacturing/storage or testing operations are described in Annexes 3 and 4 respectively.

¹ The authorisation referred to in paragraph 40(1) of Directive 2001/83/EC and Regulation 2019/6 is also required for imports coming from third countries into a Member State.

² Guidance on the interpretation of this template can be found on www.hpra.ie and in the help menu of the EudraGMDP database.

Annex no.	Annex title	Notes
Annex 2	Scope of authorisation relating to investigational medicinal products	This annex describes manufacturing/importation/testing operations which are carried out directly under this authorisation only. Contracted manufacturing/storage or testing activities are described in Annexes 3 and 4 respectively. (Annex 2 uses the same headings for manufacture, importation and testing activities and for this reason it is not reproduced as a separate section in this guidance document.)
Annex 3	Names and addresses of contract manufacturing site(s) and the activities carried out at those sites	This includes other activities related to manufacturing such as contract storage sites. This information is not published on the EudraGMDP database.
Annex 4	Names and addresses of contract laboratories and the testing activities carried out at those sites	This information is not published on the EudraGMDP database.
Annex 5	Name(s) of Qualified Person(s)	This information is not published on the EudraGMDP database.
Annex 6	Names of key personnel responsible for production operations and quality control	This information is not published on the EudraGMDP database.
Annex 7	Date of inspection on which authorisation granted, scope of last inspection	This optional annex within the EU format for a manufacturer's authorisation is not currently used by the HPRA. A description of the annex number/title is referenced here merely for completeness.
Annex 8	Importation of products which are contract manufactured at a site outside the EEA	This information is not published on the EudraGMDP database.

TYPE OF AUTHORISATION REQUIRED

There are three types of manufacturer's authorisations:

- Manufacturer's authorisation for medicinal products for human use
- Manufacturer's authorisation for investigational medicinal products for human use
- Manufacturer's authorisation for medicinal products for veterinary use

These authorisations are required where the company performs manufacturing or importation activities related to the category of medicinal products in question. A separate application is required for each type of authorisation. A manufacturer's authorisation covering manufacturing and/or importation activities is referred to as an MIA.

NEW APPLICATIONS FOR A MANUFACTURER'S AUTHORISATION

Applicants who wish to apply for an MIA should review all sections of this guidance. Relevant documentation as described must be provided with the application to support any entries in the Annexes.

Companies considering establishing a manufacturing site in Ireland are encouraged to engage with the HPRA at an early stage and request a pre-submission meeting to facilitate the application and authorisation process. Further details can be found in the 'Request for pre-submission meeting for MIA' form and the Guide to Scientific and Regulatory Advice for GXP activities' on the HPRA [website](#).

To receive an authorisation to manufacture medicinal products, a potential authorisation holder must demonstrate compliance with the principles of Good Manufacturing Practice (GMP). In the majority of cases, a GMP inspection will be carried out as part of the authorisation process.

To initiate the application process, a completed pre-submission request form should be submitted to the Licensing section of the HPRA. A pre-submission meeting will be arranged to discuss the steps involved in MIA application process, the proposed manufacturing activities and the company's proposed timeline for starting manufacturing operations. Prospective applicants will be asked to keep the HPRA apprised of their progress and to provide a statement that they are ready for an inspection. A follow up meeting may be arranged at this point. If the company confirms that it has the necessary elements in place an MIA application form will be provided and should be submitted within one week to the Licensing section of the HPRA.

The timeline for this application process is 90 days from receipt of the application by the HPRA. This timeline is suspended during periods where further information is required from the applicant.

APPLICANT DETAILS

The applicant must register with the EMA's Organisation Management Service before submitting an application to the HPRA. The organisation and location ID's must be provided on the

application form. More information on the Organisation Management Service can be found on the [EMA's website](#).

When making the application the manufacturer should provide appropriate documentation as evidence of the authorisation holder's legally registered address (e.g. Certificate of Incorporation from the Companies Registration Office). This address may differ from the address where manufacturing activities take place.

A business name (also known as a trading style) is where the name used to carry on business by any individual, body corporate or partnership (whether of individuals and/or bodies corporate), at a place of business in the Republic of Ireland is not the same as their company registered name(s). Evidence of registration of the business name with the Companies Registration Office should also be provided.

The supporting documentation required is detailed in Table 1 below.

Guidance on addresses

- If the manufacturing site consists of a number of separate units located in an industrial estate which are managed under the same pharmaceutical quality system and under the responsibility of the same key personnel named on this application, then include the main contact address for the manufacturing site.
 - o Provide details of other 'units' which will operate under the scope of this authorisation below the main contact address.
 - o In the event that this application is successful then a single manufacturer's authorisation and one GMP certificate referencing all the units will be issued on the EudraGMDP database.

- If the manufacturing activities are carried out at addresses which are not adjacent or in close proximity, then a separate 'Scope of authorisation' section must be completed for each address.
 - o All of the manufacturing activities must be under the same pharmaceutical quality system and under the responsibility of the same key personnel for these separate addresses to be considered under a single manufacturer's authorisation application. In the event that this application is successful then a single manufacturer's authorisation, which includes details of the activities at each separate address, will be issued on EudraGMDP and a separate GMP certificate will be issued on EudraGMDP for each manufacturing address.

- The Eircode(s) of sites is required on all new applications for a manufacturer's authorisation and on completion of a successful application will be included on the GMP certificate.

- The Location I.D. and Organisation I.D. of sites is required on all new applications for a manufacturer's authorisation and on completion of successful application will be included on GMP certificate.

Table 1: Applicant and site details

Guidance	Supporting documentation
Review the guidance above for applicant details and the site address	<p>Submit documentation from the Companies Registration Office outlining the applicant's legal name, address and registration number.</p> <p>Where the applicant wishes to trade under a business name, submit documentation from the Companies Registration Office outlining the applicant's business name, address and registration number.</p> <p>Submit a site master file prepared in line with EU GMP guidance regarding the structure and content of this document.</p>

ANNEX 1 AND 2 MANUFACTURING AND IMPORTATION OPERATIONS

The information in this section of the form is relevant to Annex 1 or Annex 2 and will be designated in the final authorisation document depending on the type of authorisation selected in the previous step.

Part 1 Manufacturing operations

The scope of manufacturing operations which are authorised at the site is defined using the unit operations listed below. Each of the individual operations carried out by the authorisation holder is identified on the manufacturer's authorisation, as appropriate.

Processing operations ¹	This includes any or all processing steps in the manufacture of a dosage form.
Primary packing ¹	Refers to placing and sealing of the medicinal product within the finished product packaging material, which is in direct contact with the product.
Secondary packing ¹	Refers to placing the medicinal product, which is already sealed within its primary packaging material, within an outer packaging material. This also includes labelling operations or the assembly of other components which are specified in the marketing authorisation (or product specification file in the case of an IMP) to form the finished product pack.

Batch certification ¹	<p>Refers to the certification of a finished product batch of medicinal product by a QP before its release into the market place or before a batch is exported.</p> <p>For an IMP, this refers to the QP certification of the batch of IMP before release to the clinical trial sponsor or before export.</p>
Quality control ¹	Refers to types of laboratory testing which the manufacturer's authorisation holder is authorised to perform.
Storage	Any site which holds a manufacturer's authorisation and carries out processing operations or packaging of medicinal products is also understood to be authorised for storage. If a site is carrying out other manufacturing operations where storage is not automatically understood to be included, as described above, then use section 1.4.3 <Other> to identify storage activity.
Distribution ²	Any site which holds a manufacturer's authorisation and which carries out manufacturing operations on batches of medicinal products is also authorised to distribute those batches of medicinal products unless there is a comment to the contrary in the clarifying remarks. Distribution activities related to post QP batch certification by another manufacturing authorisation holder require a wholesale distribution authorisation (WDA).
Real time release testing	If a manufacturer is authorised to carry out real time release testing instead of one or more finished product tests, then identify this as a clarifying remark in relation to the processing operations for the particular dosage form. The type of real time release testing (e.g. parametric release) which is authorised is also to be identified in the clarifying remarks. The use of real time release testing should reflect any relevant requirements described in a marketing authorisation or clinical trial application.

Notes:

¹ Using the guidance described in chapters 3 and 5 of the GMP Guide, manufacturers should evaluate materials which are handled at the site with regard to the risk posed in terms of their potency, toxicity or potential for sensitisation.

- If a site is authorised to carry out processing operations or primary packing activities on substances or products which are considered to be highly sensitising, highly potent or highly toxic or have a specific hazard (e.g. radiopharmaceuticals) then this is identified in relation to the particular dosage form using the relevant items from the list below.
- Any restrictions that may apply in relation to these products (e.g. if product is to be manufactured in a dedicated facility) should be included in the clarifying remarks with reference to the relevant dosage form.

- List of specific hazards for a dosage form (as per drop down menu items from EudraGMDP):

- o β -Lactam antibiotics
- o Other highly sensitising materials
- o Live cells
- o Pathogenic Organisms (Biosafety 3 or 4)
- o Radiopharmaceuticals
- o Ectoparasitocides
- o Others (free text entry)

Examples of products to be included under 'Other' category include:

- o Highly potent products
- o Highly toxic products

² If a manufacturer has not carried out a manufacturing operation on a batch of medicinal product which it intends to distribute (including manufacture of the dosage form, packaging or batch certification) then the site is required to hold a separate wholesale distribution authorisation (WDA) for distribution activities in relation to those batches or products.

1.1 Sterile Products

1.1.1 Aseptically prepared (processing operations for the following dosage forms)

- 1.1.1.1 Large volume liquids
- 1.1.1.2 Lyophilisates
- 1.1.1.3 Semi-solids
- 1.1.1.4 Small volume liquids
- 1.1.1.5 Solids and implants
- 1.1.1.6 Other aseptically prepared products <free text>

An example of an activity captured under 1.1.1.6 'Other':
'Manufacture of sterile active substance'.

1.1.2 Terminally sterilised (processing operations for the following dosage forms)

Where terminal sterilisation of a product is not carried out on site by the manufacturer's authorisation holder but is contracted out to another site, enter a comment such as 'terminal sterilisation by gamma irradiation is outsourced to another site' in relation to that dosage form in the clarifying remarks section.

- 1.1.2.1 Large volume liquids
- 1.1.2.2 Semi-solids
- 1.1.2.3 Small volume liquids
- 1.1.2.4 Solids and implants
- 1.1.2.5 Other terminally sterilised prepared products <free text>

1.1.3 Batch certification

This is understood to apply to all sterile dosage forms unless restrictions are stated in the clarifying remarks. See Appendix 4 regarding requirements for remote batch certification by the Qualified Person.

1.2 Non-sterile products

1.2.1 Non-sterile products (processing operations for the following dosage forms)

- 1.2.1.1 Capsules, hard shell
- 1.2.1.2 Capsules, soft shell
- 1.2.1.3 Chewing gums
- 1.2.1.4 Impregnated matrices
- 1.2.1.5 Liquids for external use
- 1.2.1.6 Liquids for internal use
- 1.2.1.7 Medicinal gases
- 1.2.1.8 Other solid dosage forms
- 1.2.1.9 Pressurised preparations

1.2.1.9 'Pressurised preparations' are defined as preparations presented in special containers under pressure of a gas. If, for example, a liquid aerosol is generated by mechanical pumping action rather than a propellant then such dosage forms are categorised as 'Liquids for external use' or 'Liquids for internal use', as appropriate.

A metered dose inhaler which uses a propellant to deliver the required dose is listed as a 'Pressurised preparation'. If the dose is delivered by other means, e.g. breath activation, then enter processing operations relating to this dosage form under Other (1.2.1.17) 'Breath activated metered dose inhaler'.

- 1.2.1.10 Radionuclide generators
- 1.2.1.11 Semi-solids
- 1.2.1.12 Suppositories
- 1.2.1.13 Tablets
- 1.2.1.14 Transdermal patches
- 1.2.1.15 Intraruminal devices
- 1.2.1.16 Veterinary premixes
- 1.2.1.17 Other non-sterile medicinal product <free text>

Examples of activities captured under 1.2.1.17 'Other':

- 'Manufacture of intermediates' (e.g. powders for further processing)
- 'Overencapsulation' (This activity is usually applicable to IMPs and controls may differ from those used in filling a standard hard shell capsule product.)
- 'Breath activated metered dose inhaler'

1.2.2 *Batch certification*

This is understood to apply to all non-sterile dosage forms unless restrictions are stated in the clarifying remarks. See Appendix 4 regarding requirements for remote batch certification by the Qualified Person.

1.3 **Biological medicinal products**

A biological medicinal product is a medicinal product, the active substance of which is a biological substance.

A biological substance is a substance that is produced by or extracted from a biological source and that needs for its characterisation and the determination of its quality a combination of physico-chemical-biological testing, together with the production process and its control.

There may be substances obtained from a biological source (e.g. extracted from a plant or animal source) which do not require a biological test to determine appropriate quality of the substance. Products manufactured using such substances are not generally classified as biological medicinal products and therefore not listed under this section of the manufacturer's authorisation.

1.3.1 *Biological medicinal products*

Categorisation of biological products:

The following product categories are used to identify if a site is carrying out any processing steps relating to the manufacture of a biological product. The manufacture of the biological substance may be part of the continuum of processing steps in the manufacture of the finished biological product and these operations are captured under this section, where appropriate.

- Where the authorised operations also include manufacture of the finished dosage form for the biological product then the relevant dosage form is also selected on the manufacturer's authorisation.

Example: for a company manufacturing a lyophilised finished dosage form of a biotechnology derived product, the following operations are stated on the manufacturing authorisation:

- o 1.1.1.2 Lyophilisates
- o 1.3.1.5 Biotechnology products

Example of clarifying remark: 1.3.1.5 relates to the manufacture of a biological active substance using mammalian cell culture, its isolation/purification, formulation of a low bioburden bulk intermediate and manufacture of the finished dosage form.

1.3.1.1 Blood products

Blood products:

Select this category where there are processing operations performed in relation to biological products containing an active substance isolated from blood. Examples of such products include albumin, plasma Factor VIII or immunoglobulins which are isolated from blood. The processing of Factor VIII, which is manufactured using a biotechnology method, is not included in this category. For a human medicine, the steps in the manufacture of a blood product, which come under a manufacturer's authorisation, are those processing steps which are not covered under Directive 2002/98/EC.

1.3.1.2 Immunological products

Immunological products:

Select this category where there are processing operations carried out in relation to manufacture of biological products which have an immunological mode of action (e.g. vaccines).

1.3.1.3 Cell therapy products

Cell therapy products:

Somatic cell therapy medicinal product is defined in Part IV of Annex I to Directive 2001/83/EC. Select this category where there are processing operations carried out in relation to the manufacture of cell therapy products. The steps in the manufacture of cell therapy product, which come under a manufacturer's authorisation, are those steps which are not covered under Directive 2004/23/EC.

1.3.1.4 Gene therapy products

Gene therapy products:

A gene therapy medicinal product is defined in Part IV of Annex I to Directive 2001/83/EC. Select this category where there are processing operations carried out in relation to the manufacture of gene therapy products. The steps in the manufacture of a gene therapy product, which come under a manufacturer's authorisation, are those steps which are not covered under Directive 2004/23/EC.

1.3.1.5 Biotechnology products

Biotechnology products:

Biotechnology includes the use of genetically modified mammalian cells or micro-organisms, (e.g. bacteria or yeasts), or biological substances (e.g. enzymes), in the manufacture of

biological products. This category is selected where there are processing operations carried out in relation to the manufacture of biological products using biotechnology.

For steps involving the manufacture of a biological product manufactured via a biotechnology route, insert a clarifying remark relating to activities under 1.3.1.5 to specify which of the following activities apply:

- Cell culture (specify whether mammalian/bacterial, etc.)
- Isolation/purification
- Modification (e.g. pegylation)
- Other (e.g. manufacture of the low bioburden bulk intermediate)
- Manufacture of the final dosage form

1.3.1.6 Human or animal extracted products

Human or animal extracted products:

Select this category where processing steps are carried out in relation to the manufacture of a biological product containing active substances derived from human or animal sources (cells, tissues, fluids), with the exception of blood. The steps in the manufacture of human extracted products, which come under a manufacturer's authorisation, are those steps which are not covered under Directive 2004/23/EC.

1.3.1.7 Tissue engineered products

Tissue engineered products:

A tissue engineered product is defined in Article 2(1)(b) of Regulation (EC) No 1394/2007. Select this category where processing steps are carried out in relation to the manufacture of a product that contains or consists of engineered cells or tissues, and is presented as having properties for, or is used in or administered to human beings with a view to regenerating, repairing or replacing a human tissue. The steps in the manufacture of tissue engineered product derived from human tissue which come under a manufacturer's authorisation are those steps which are not covered under Directive 2004/23/EC.

1.3.1.8 Other biological medicinal products <free text>

Other biological medicinal products (specify):

Select this category where processing steps are carried out in relation to manufacture of a biological product, including a biological active substance which does not fit into the previously named categories. An example would be allergen products, which are derived from non-animal sources such as grass-pollen.

1.3.2 *Batch certification (list of product types)*

Complete this section with regard to final QP certification of the finished dosage form of a biological product. An entry should also be made under 1.1.3 or 1.2.2, as appropriate to identify if the dosage being certified is a sterile or non-sterile product respectively. See Appendix 4 regarding requirements for remote batch certification by the Qualified Person.

- 1.3.2.1 Blood products
- 1.3.2.2 Immunological products
- 1.3.2.3 Cell therapy products
- 1.3.2.4 Gene therapy products
- 1.3.2.5 Biotechnology products
- 1.3.2.6 Human or animal extracted products
- 1.3.2.7 Tissue engineered products
- 1.3.2.8 Other biological medicinal products <free text>

1.4 **Other products or manufacturing activity**

Note: where a manufacturer carries out processing steps in relation to herbal or homoeopathic dosage forms (e.g. tablets) then there will be an entry for the relevant dosage form (sections 1.1 to 1.2) in addition to the entry in this section. Where the facility is only authorised for manufacturing operations in relation to herbal or homoeopathic products then include a clarifying remark ('herbal products only' or 'homoeopathic products only') in relation to the dosage forms/manufacturing operation authorised on the manufacturer's authorisation.

1.4.1 *Manufacture of other products*

- 1.4.1.1 Herbal products
- 1.4.1.2 Homoeopathic products
- 1.4.1.3 Other <free text>

1.4.2 *Sterilisation of active substances/excipients/finished product*

Complete this section where these sterilisation activities are not carried out as part of the manufacture of a dosage form, for example, where the manufacturer's authorisation holder is a contract sterilisation facility performing gamma irradiation of products on behalf of other manufacturers.

- 1.4.2.1 Filtration
- 1.4.2.2 Dry heat
- 1.4.2.3 Moist heat
- 1.4.2.4 Chemical

1.4.2.5 Gamma irradiation

1.4.2.6 Electron beam

1.4.3 Other <free text>

Example of activities to be listed under 1.4.3: 'Storage': where a site only carries out batch certification and storage of medicinal products.

1.5 Packaging

1.5.1 Primary packing

Primary packing of a sterile product is taken as being included as part of the processing operations covered under section 1.1 in relation to sterile products unless a comment to the contrary is entered in the clarifying remarks in relation to the particular dosage form.

1.5.1.1 Capsules, hard shell

1.5.1.2 Capsules, soft shell

1.5.1.3 Chewing gums

1.5.1.4 Impregnated matrices

1.5.1.5 Liquids for external use

1.5.1.6 Liquids for internal use

1.5.1.7 Medicinal gases

1.5.1.8 Other solid dosage forms

1.5.1.9 Pressurised preparations

1.5.1.10 Radionuclide generators

1.5.1.11 Semi-solids

1.5.1.12 Suppositories

1.5.1.13 Tablets

1.5.1.14 Transdermal patches

1.5.1.15 Intraruminal devices

1.5.1.16 Veterinary premixes

1.5.1.17 Other non-sterile medicinal products <free text>

Example of activities to be captured under 1.5.1.17 'Other non-sterile medicinal products':

If the manufacturer's authorisation holder carries out primary packing but not the actual manufacture of a dosage form (e.g. implants), which subsequently undergoes terminal sterilisation, enter a statement under 'Other non-sterile medicinal products' 1.5.1.17, as follows: 'Primary packing of (*name of dosage form*), which undergoes terminal sterilisation'.

1.5.2 *Secondary packing*

Where secondary packaging is authorised it is understood to apply to all dosage forms unless otherwise specified in the clarifying remarks.

1.6 Quality control testing

Where quality control testing is carried out at the site authorised, categories of testing should be identified below.

- 1.6.1 *Microbiological: sterility*
- 1.6.2 *Microbiological: non-sterility*
- 1.6.3 *Chemical/Physical*
- 1.6.4 *Biological*

Any restrictions or clarifying remarks related to the scope of these manufacturing operations

The HPRA may add restrictions or clarifying remarks related to the scope of these manufacturing operations. Unless a clarifying remark is intended as a general comment relating to activities at the site, a numerical reference, as per the item listing on the manufacturer's authorisation format, is included wherever a clarifying remark or restriction is applied.

Remarks may be entered as confidential or public remarks on EudraGMDP, as determined by the HPRA. Confidential remarks may only be viewed by competent authorities (registered users on EudraGMDP) whereas public remarks can be viewed by anyone.

The supporting documentation required for the manufacturing operations in Annex 1 or 2 is detailed in Table 2.

Table 2: Part 1 manufacturing operations, Annex 1 or 2

Guidance	Supporting documentation
Review the guidance above for the selection of manufacturing operations to be conducted at the site	Submit a site master file prepared in line with EU GMP guidance regarding the structure and content of this document.

Part 2 Importation of medicinal products

For requirements regarding listing of contract manufacturing sites in Annex 3 and imported products in Annex 8 on manufacturer's authorisations, refer to guidance provided in Annex 3 and 8 of this document.

No entries are required in Annex 3 and 8 where physical importation is the only activity carried out in relation to the imported product. However, all relevant information regarding contract manufacturers and listing of imported products must be available in the site master file.

2.1 Quality control testing of imported medicinal products

Where quality control testing is carried out at the site in relation to imported medicinal products, identify the authorised categories of testing. Complete this section where applicable, even if entries have been made under section 1.6 relating to the same testing operations on products manufactured in the EEA.

- 2.1.1 Microbiological: sterility
- 2.1.2 Microbiological: non-sterility
- 2.1.3 Chemical/Physical
- 2.1.4 Biological

2.2 Batch certification of imported medicinal products

Complete this section where the site performs certification of either an imported finished product or a bulk dosage form which undergoes packing after importation. If the manufacturer's authorisation holder is also the site of physical importation, then an entry is made under 2.3.1.

For **IMP** manufacturers (Annex 2), identify authorisation to carry out certification of imported comparator products by a clarifying remark in relation to the relevant product category. See Appendix 4 regarding requirements for remote batch certification by the Qualified Person.

- 2.2.1 *Sterile Products*
 - 2.2.1.1 Aseptically prepared
 - 2.2.1.2 Terminally sterilised
- 2.2.2 *Non-sterile products*
- 2.2.3 *Biological medicinal products*

Identify the relevant dosage form under 2.2.1 or 2.2.2 in addition to the category of biological product.

- 2.2.3.1 Blood products
- 2.2.3.2 Immunological products
- 2.2.3.3 Cell therapy products
- 2.2.3.4 Gene therapy products
- 2.2.3.5 Biotechnology products
- 2.2.3.6 Human or animal extracted products
- 2.2.3.7 Tissue engineered products
- 2.2.3.8 Other biological medicinal products <free text>

2.3 Other importation activities (any other relevant importation activity that is not covered above)

2.3.1 *Site of physical importation*

An entry here means that the site is authorised to receive and store imported product which is awaiting QP certification. Certification is identified separately in relation to the relevant product categories under section 2.2.

2.3.2 *Importation of intermediate which undergoes further processing*

The type of intermediate is specified, e.g. granulate, sterile active substance, partially manufactured biological product.

2.3.3 *Biological active substance*

2.3.4 *Other <free text>*

Any restrictions or clarifying remarks related to the scope of these importation operations

The HPRA may add restrictions or clarifying remarks related to the scope of these importation operations.

Unless a clarifying remark is intended as a general comment relating to activities at the site, include a numerical reference, as per the item listing on the manufacturer's authorisation format, wherever a clarifying remark or restriction is applied.

Remarks may be entered as confidential or public remarks on EudraGMDP, as determined by the HPRA. Confidential remarks may only be viewed by competent authorities (registered users on EudraGMDP) whereas public remarks can be viewed by anyone.

The supporting documentation required for the importation of medicinal products in Annex 1 or 2 is detailed in Table 3.

Table 3: Part 2 importation of medicinal products Annex 1 or 2

Guidance	Supporting documentation
Review the guidance above for the selection of manufacturing operations to be conducted at the site	Submit a site master file prepared in line with EU GMP guidance regarding the structure and content of this document.

ANNEX 3 CONTRACT MANUFACTURER(S)

Please complete a separate Annex 3 for **each** contract manufacturer.

Naming contract manufacturing sites:

- Contract manufacturing sites should be named in Annex 3 in the following scenarios:
 - o When a manufacturer's authorisation holder performs batch certification, all sites (including those in third countries) involved in the manufacture of the product are required to be listed on the manufacturer's authorisation.
 - For contract manufacturers located in a third country: refer to guidance in Annex 8 regarding requirements for naming imported products.
 - For **IMP** authorisations no entries are required in Annex 8.
 - All sites involved in the manufacture of a biological medicinal product, including the biological active substance, are required to be named on the manufacturer's authorisation.
 - o When a manufacturer's authorisation holder outsources manufacturing activities for which it is responsible through technical agreements, all sites where these outsourced activities occur are required to be listed.
- Contract manufacturing sites are not required to be named in Annex 3 when:
 - o Site of physical importation is the only activity carried out by the holder of the manufacturer's authorisation.
 - o In the case of an IMP authorisation: Manufacturers which carry out manufacturing steps for a product which are in accordance with an EU approved marketing authorisation for that product, and where a QP has provided confirmation that the steps have been carried out in accordance with the marketing authorisation.
 - o The product supplied is to be used as a comparator product in an ongoing clinical trial.
 - o Sites where Master or Working Cell Banks are generated and/or stored.

Listing operations conducted by contract manufacturing sites:

The operations described at the contract manufacturing site should reflect what will actually be conducted at the contract site on behalf of the MIA holder. For example, if a contract manufacturing site is authorised to perform multiple manufacturing operations, but will only conduct secondary packaging on behalf of the MIA holder, only secondary packaging operations would be specified for the site in Annex 3. Please refer to the guidance outlined for the Annex 1 or 2 manufacturing operations section which is also applicable for describing operations carried out at a contract manufacturer. Batch certification cannot be outsourced to a contract manufacturer and is therefore not applicable to activities conducted under Annex 3.

Supporting documentation:

Applicants **must** submit the following details relating to contract manufacturing facilities used:

- Name and address of facility (as it appears on a GMP certificate for the site, if one exists unless otherwise justified).

- Manufacturing operations performed and quality control testing, where the testing is performed at the same site (as per guidance for Annex 1 or 2).
- Evidence of satisfactory inspection, e.g. copy of GMP certificate for a site inspected by an EEA authority.
 - o The GMP certificate should be issued by a relevant competent authority in the EEA (preferably within the last three years).
 - o The scope of the certificate should include the proposed manufacturing operations for the relevant dosage form which will be manufactured at the site.
 - For example, a GMP certificate related to investigational medicinal products would not support the addition of a contract site to an authorised human medicines manufacturer's authorisation.
 - Justification should be provided if the supporting documentation does not clearly reflect the activities included in the application.

Sites based in MRA territories:

The EU has a number of Mutual Recognition Agreements (MRAs) with various third countries for the mutual recognition of pharmaceutical manufacturing inspections. Applicants should note that each MRA has a different scope, and for some territories an inspection by an EU competent authority is still required for certain activities.

An applicant can rely on an inspection performed by a MRA partner if the operations to be conducted are within the scope of the MRA.

The applicant should also ensure that the site in question is appropriately authorised by the MRA partner to conduct the requested activity.

Applicants should refer to the information provided in Appendix 1 to determine the required supporting documentation for the addition of contract sites based in MRA partner territories.

Supporting documentation for IMP authorisations:

For the addition of contract manufacturing sites located in a third country to **IMP** authorisations, there may be circumstances where these sites do not hold an EU GMP certificate for manufacture of IMPs or an equivalent MRA partner document. In the absence of the above, submit a declaration by a QP named on the authorisation regarding GMP compliance of the contracted site in relation to the activities concerned (see Appendix 3 for further guidance).

Contract storage sites:

Guidance regarding the listing of contract storage sites in Annex 3:

- Only contract storage sites which store the following should be listed on the manufacturer's authorisation:
 - o Intermediates/partially manufactured medicinal products.
 - o Products in quarantine/products awaiting QP certification.
 - o Storage location of reference/retention samples.
- There is no requirement to list contract storage sites on the manufacturer's authorisation which store:
 - o QP certified finished product.
 - o Master Cell Banks or Working Cell Banks.
 - o Storage sites for IMP, finished product or intermediate product located in a third country.
 - o Storage of stability samples.
 - o Storage of starting materials.

For sites which are engaged in storage, it is not necessary to specify the particular product types to which these activities apply.

Supporting documentation for contract storage sites:

- In the absence of GMP certification, a declaration by a QP named on the authorisation stating that they are satisfied that the contracted site operates in accordance with EU GMP in relation to the activities concerned is acceptable. The HPRA reserves the right to perform its own inspection of the contracted site.
- A wholesale distribution authorisation (WDA) can be used to support the addition of a storage site for products awaiting batch certification by a QP. The WDA must include authorisation for holding of medicinal products.
- Appropriate active substance registrations may be considered to support the addition of a storage site.

Contract site for physical importation activities:

Where physical importation is outsourced to a contract manufacturer, this activity will be recorded under operation 1.4.3.

Where physical importation is conducted at a site located in another Member State, the applicant should be satisfied that each site used for physical importation is appropriately authorised by the relevant competent authority of that Member State.

1.4.3 *Other <free text>*

For a contract storage site which is also acting as site of physical importation, include the following text 'storage/site of physical importation' here.

Enter clarifying remarks in relation to the contract manufacturing operations following the same guidance as applied in Annex 1.

The supporting documentation required for contract manufacturers in Annex 3 is detailed in Table 4.

Table 4: Contract manufacturers, Annex 3

Guidance	Supporting documentation
Review the guidance above for contract manufacturers	Provide the supporting documentation outlined above for the addition of the contract manufacturing site in question.

ANNEX 4 CONTRACT LABORATORY

Please complete a separate Annex 4 for **each** contract laboratory.

Naming contract laboratory sites:

When a contract manufacturer is also performing testing operations, then these testing activities appear for the site in Annex 3. Do not duplicate the information in Annex 4.

Contract laboratory sites should be named for the following types of testing:

- In-process tests or finished product tests which are described in a marketing authorisation.
- Stability tests which are described in a marketing authorisation.

Supporting documentation:

Applicants **must** submit the following details relating to contract laboratories:

- Name and address of facility (as it appears on a GMP certificate for the site, if one exists).
- Evidence of satisfactory inspection, e.g. copy of GMP certificate.
 - o The GMP certificate should be issued by a relevant competent authority in the EEA (preferably within the last three years).
 - o The scope of the certificate should include the testing operations proposed at the site. For example, a GMP certificate related to investigational medicinal products would not support the addition of a contract site to an authorised human medicines manufacturer's authorisation.

Sites based in MRA territories:

The information provided regarding MRA sites in Annex 3 is also applicable for the addition of contract laboratories based in MRA partner territories. Applicants should refer to the Annex 3 guidance and Appendix 1 of this document.

Supporting documentation for IMP authorisations:

For the addition of a contract laboratory located in a third country to **IMP** authorisations, in the absence of an EU GMP certificate or equivalent MRA document, submit a declaration by a QP named on the authorisation regarding GMP compliance of the contracted site in relation to the activities concerned (see Appendix 3 for further guidance).

New contract laboratories based in Ireland:

If a manufacturer is intending to use a new contract laboratory located in Ireland that does not currently hold a GMP certificate:

- The MIA holder should submit a variation application to the HPRA to add the contract laboratory to its MIA, specifying the type of testing which it intends to outsource.
- The HPRA will make arrangements for inspection directly with the contract laboratory and fees associated with the inspection will be charged to the contract laboratory.
- Pending a satisfactory inspection, the resultant GMP certificate will be used as the basis of approval of the variation to the contract-giver's MIA.

Testing operations are identified for each contract laboratory using the following categories:

- Microbiological: Sterility
- Microbiological: Non Sterility
- Chemical/physical
- Biological
- Stability

Stability testing is selected when the site only performs activities in relation to stability testing. In addition to selecting the stability category, applicants should also identify the specific category of testing by selecting Microbiological: Sterility, non-sterility, chemical/physical and/or biological as appropriate.

Contract laboratories which perform only stability testing of authorised medicines can be added to the MIA on the basis of a declaration by a QP named on the authorisation, regarding GMP compliance of the contracted site in relation to the activities concerned. The HPRA reserves the right to perform its own inspection if deemed necessary or request another relevant authority to inspect where appropriate.

Further guidance is provided in Appendix 3.

ANNEX 5 QUALIFIED PERSON(S)

Applicants **must** submit the following details:

- A copy of relevant qualifications as issued by a relevant third level institution to support educational requirements for a QP.
- A copy of the proposed QP's CV. This should include evidence of QP status if the applicant has acted as a QP in another EU jurisdiction.
- The current email address for each proposed QP.
- A summary of training, relevant to the role of QP, performed at the manufacturing site concerned. This should be in the form of a training programme for the role of QP at the site rather than simply a printout of training in various standard operating procedures (SOPs), for example as might be obtained from a learning management system. This should be signed by the proposed QP and, if applicable, their relevant superior.
 - o Details of product specific training should also be included in cases when the product types are new to a site.
 - o Where all relevant training has not been completed at the time of application, then a statement should be included in the training summary or in the application submission stating that the required minimum training will be completed prior to commencement of

batch certification activity by the proposed QP. See also the HPRA 'Guide to Attainment of Qualified Person Status in Ireland'.

Note that at least one qualified person must be included on the MIA.

ANNEX 6 PERSONNEL FOR PRODUCTION OPERATIONS AND QUALITY CONTROL

Personnel responsible for production and quality control are required to be named when the manufacturer's authorisation includes operations at the site for the corresponding activity.

For example, when a manufacturer's authorisation is granted in relation to batch certification only, no personnel for production or quality control should be named.

In line with the requirements of Chapter 2 of the EU GMP guidelines, the person responsible for production may not be the same as the person responsible for quality control.

The supporting documentation required for persons responsible for quality control/production in Annex 6 is detailed in Table 5.

Table 5: Responsible Person(s), Annex 6

Guidance	Supporting documentation
Review the guidance above for personnel responsible for: <ul style="list-style-type: none">- Production- Quality Control	A copy of the applicant's CV must be submitted as supporting documentation. The applicant must have appropriate qualifications and practical experience relevant to the site activities, as well as adequate authority to carry out their responsibilities. The responsibilities of the Heads of Production and Quality Control are outlined in Chapter 2 of the EU Guide to GMP.

ANNEX 7 (OPTIONAL) – NOT USED BY THE HPRA

This is an optional annex which includes certain details relating to the last inspection and is not used by the HPRA.

ANNEX 8 IMPORTATION OF PRODUCTS WHICH ARE CONTRACT MANUFACTURED AT A SITE OUTSIDE THE EEA

Please complete a separate Annex 8 for **each** site from which products are imported (i.e. last third country site in the manufacturing chain).

Note: Third country sites involved in storage only prior to importation should not be listed in Annex 8.

Annex 8 is required in the following scenario:

- When the MIA holder performs batch certification of imported products which are imported either as a bulk dosage form (e.g. bulk tablets or bulk nude vials) or finished packed product.

Annex 8 is not required:

- Where physical importation is the only activity performed under the manufacturer's authorisation.
- For **IMP** manufacturer's authorisations.
- Where imported product intermediates are processed into the final dosage form within the EU.

Guidance on information to be included:

The applicant is required to complete the following table for inclusion of product information in this Annex; this is outlined and included in the relevant application form. The third country site listed in Annex 8 should be included in Annex 3, with appropriate operations for the manufacture and packaging of the product specified. The name and address of this site should accurately reflect the details provided in Annex 3. These table entries in Annex 8 are specific to a single contract manufacturer. Where the same product is imported from multiple third country manufacturers, a separate Annex 8 table is required for each contract manufacturer.

Product type:		Dosage form:		
Details of imported product				
Product description	Strength	Active ingredient	Activities by MIA holder	
			Batch certification	Site of physical importation

The 'product type' field of the table refers to whether the products are non-sterile products, aseptically prepared products or terminally sterilised products.

The 'dosage form' field should correspond to the description of the manufacturing operation for the dosage form at the relevant contract manufacturing site as specified in Annex 3. For example, 'Small volume liquids' or 'Tablets'.

In instances where both the 'product type' field and 'dosage form' field are the same for a group of products imported from the same contract manufacturer, they will be included on the same table (see the example provided below). Where this information is not the same for the products, separate tables are required. For example, where tablets and capsules are imported from the same contract manufacturer separate tables are required, as the 'dosage form' fields will be different.

The 'description' entered in the first column should complement the basic information on the dosage form as necessary.

- The trade name of the product should not be included in this description. Examples of what may be considered appropriate entries under 'Product Description' for a number of dosage forms are suggested in the table below:

Dosage Form	Product Description
Aseptically prepared small volume liquid	<ul style="list-style-type: none"> - Vials - Pre-filled syringe - Autoinjector - Vial containing concentrate for solution for infusion
Aseptically prepared lyophilisate	<ul style="list-style-type: none"> - Vial containing powder for solution for infusion
Non-sterile tablets	<ul style="list-style-type: none"> - Enteric coated tablets - Sustained release tablets - Tablets
Non-sterile semisolid	<ul style="list-style-type: none"> - Ointment - Cream - Gel - Paste
Non-sterile liquid for internal use	<ul style="list-style-type: none"> - Oral suspension - Oral liquid

- Where the products are imported as bulk dosage forms this information should be included in this section.
- The columns under 'activities by MIA holder' in the table below refer to the activities which are intended to be carried out by the applicant under this authorisation in relation to the specific product.
- Enter 'Yes' or 'No' to confirm the activities performed by the MIA holder (Batch Certification and Physical Importation).

Example of a completed table:

Product type: Terminally sterilised			Dosage form: Small volume liquids	
Details of imported product				
Product description	Strength	Active ingredient	Activities by MIA holder	
			Batch certification	Site of physical importation
Prefilled syringe	150 mcg	Adrenaline	Yes	No
Single-dose eye drops	2%	Pilocarpine	Yes	No
Bulk Ampoules	50 mg/ml	Haloperidol	Yes	No

The above table outlines an example of the type of information to be included in each field of the table. As outlined above, where the 'product type' fields and 'dosage form' fields are the same for the products they may be included in the one table. In the event that these fields are different, separate tables would be required.

Acceptance of a product entry in Annex 8 does not infer that the product is approved for any particular market. The QP should ensure that the product has received relevant market approvals prior to certification of batches.

CONTACT DETAILS

For further information or guidance, please contact:

Email: compliance@hpra.ie

Licensing Section
 Compliance Department
 Health Products Regulatory Authority
 Kevin O'Malley House
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APPENDIX 1 SUPPORTING DOCUMENTATION REQUIRED FOR SITES BASED IN MRA PARTNER TERRITORIES

General guidance for the inclusion of contract sites based in MRA partner territories is outlined in the Annex 3 guidance. Applicants should refer to this general guidance and provide the supporting documentation outlined below for sites covered within the scope of an MRA with the EU. Please note that in certain circumstances, it may be necessary for the HPRA to request further information from the relevant MRA partner. In these instances, it will not be possible to approve the addition of the contract facility until the information is provided by the MRA partner.

There are four different scenarios when a contract site located in an MRA partner country is required to be included in an MIA:

- Addition of a contract site to a commercial MIA where the product concerned is covered by the scope of the MRA: The MIA holder is required to provide evidence of appropriate GMP certification, as detailed below under each country. This should be provided in addition to any QP declaration for the site concerned.
- Addition of a contract site to a commercial MIA where the product concerned is not covered by the scope of the MRA: The MIA holder is required to provide a GMP certificate issued by an EU regulatory authority that covers the dosage form.
- Addition of a contract site to an IMP MIA where the product concerned is covered by the scope of the MRA: The MIA holder is required to provide evidence of appropriate GMP certification, as detailed below under each country. This should be provided in addition to any QP declaration for the site concerned.
- Addition of a contract site to an IMP MIA where the product concerned is not covered by the scope of the MRA: The MIA holder is required to provide a QP declaration to support the activities to be included in Annex 3 or Annex 4 of the MIA.

Australia:

Applicants should provide a GMP certificate issued by the TGA (Therapeutic Goods Administration) of Australia, which includes within the scope of the certificate the operations to be conducted on behalf of the applicant. The inspection referenced on the certificate should preferably have been conducted within the last three years.

Canada:

Applicants should, at minimum, provide evidence of compliant status of the Canadian site with regard to the relevant category of manufacturing activity (e.g. as available on the Health Canada

website under Drug and Health Product Inspections). Alternatively, applicants can submit a copy of the inspection exit notice issued by Health Canada for the site in question.

Canadian Food and Drug Act – Section 37

Section 37(1) of the Food and Drugs Act may be invoked to exempt health products not fabricated for consumption or sale in Canada – i.e. health products fabricated in Canada for export only - from the application of the Act and Regulations: 37. Products manufactured under Section 37 of the Food and Drugs Act are excluded from the provisions of the MRA between Canada and the EU.

When including a Canadian contract manufacturer in Annex 3 of the MIA, applicants must also provide a statement signed by a QP named on the MIA that the site in Canada has not invoked any statutory articles, such as Section 37(1), which would exclude the proposed activities from the scope of the MRA.

Israel:

Applicants should provide a GMP certificate issued on EudraGMDP by the Institute for Standardization and Control of Pharmaceuticals of Israel which includes within the scope of the certificate the operations to be conducted on behalf of the applicant. The inspection referenced on the certificate should preferably have been conducted within the last three years.

Japan:

Applicants should provide a GMP certificate issued by the MHLW (Ministry of Health, Labour and Welfare) of Japan; an English language version of this document should be provided, or the document should be accompanied by an English translation. The certificate should preferably have been issued within the last three years.

When issuing GMP certificates on the EudraGMDP database, the MHLW certifies pharmaceutical manufacturing operations with respect to specific products. The applicant should confirm if the imported product is the same as that referenced on the MHLW certificate.

New Zealand:

Applicants should provide a copy of the GMP certificate issued by Medsafe. The inspection referenced on the certificate should preferably have been conducted within the last three years.

Switzerland:

Applicants should provide a GMP certificate issued by Swissmedic which includes within the scope of the certificate the operations to be conducted on behalf of the applicant. The inspection referenced on the certificate should preferably have been conducted within the last three years.

United States:

Applicants should provide the FDA (Food and Drug Administration) Establishment Identifier (FEI) number for the site in the section indicated on the application form. Applicants should also indicate in the relevant section the date of the most recent pharmaceutical inspection conducted by the FDA.

Please note the FDA may conduct other inspections such as food or cosmetic inspections so applicants should ensure the date of the most recent pharmaceutical inspection is provided.

Information provided by the FDA will then be reviewed to determine if the addition of the requested site is acceptable.

APPENDIX 2 SUPPLY OF UNLICENSED/EXEMPT MEDICINAL PRODUCTS

Article 5 of Directive 2001/83/EC outlines circumstances when a medicinal product without a marketing authorisation may be supplied. In Ireland these medicines are commonly referred to as exempt medicines and the relevant exemptions are described in the Medicinal Products (Control of Placing on the Market) Regulations 2007.

The guidance provided relates solely to the authorisation requirements for the import and supply of such medicines within Ireland. Applicants intending to import or supply medicines under Article 5 of Directive 2001/83/EC in or to other countries should ensure compliance with any local requirements applicable in that country.

For the Irish market, the import and supply of these medicines may take place under an MIA, or a wholesale distribution authorisation (WDA). The import and supply of these medicines may be performed under an MIA provided that the holder conducts manufacturing or importation operations for the products as described in part 1 or part 2 of the MIA. When these activities take place under an MIA, the following clarifying remark will be inserted on the MIA to authorise the activities:

'This site is authorised to supply medicinal products in accordance with the provisions of Article 5 of Directive 2001/83/EC providing that it would normally conduct a manufacturing activity, as listed above, for the product concerned.'

MIA holders wishing to supply products meeting these criteria under Article 5 of Directive 2001/83/EC should apply for the addition of such clarifying remarks to the MIA.

In all other circumstances the import and supply of exempt medicines is to be conducted under an MIA.

Applicants should also refer to the HPRA 'Guide to The Notification System for Exempt Medicinal Products' and any other national requirements, which may be applicable for the supply of these products in Ireland.

APPENDIX 3 DECLARATIONS BY THE QUALIFIED PERSON

Where declarations by the Qualified Person are being provided to support activities (e.g. addition of contract manufacturers in Annex 3 or contract laboratories in Annex 4), the following should be noted and considered:

- Applicants should use the European Commission's QP declaration template.
- The basis of the QP declaration should be clearly stated and encompass the proposed activities at the contract site.
- When an applicant provides multiple product specific QP declarations in order to facilitate the addition of a contract manufacturing site(s), written guidance should be provided outlining which QP declaration supports each of the manufacturing operations to be performed at the site.

It is expected that the following is accounted for on the declaration provided by the QP:

- The scope of the declaration should clearly cover the operations to be included for the contract manufacturer in Annex 3.
- The basis of the declaration should be clearly outlined within the declaration.
 - o If the declaration is based on an audit the declaration should outline:
 - When the audit was performed.
 - Sufficient detail on the scope of this audit.
 - Who performed this audit, and what their relationship is to the party being audited.
- The name and address of any sites specified on the QP declaration should fully align to what is proposed to be added to the MIA.
- Justification should be provided if the QP declaration does not clearly reflect the activities included in the application.
- The declaration should be signed and dated by a QP who is named on the MIA.

APPENDIX 4 REMOTE BATCH CERTIFICATION BY THE QUALIFIED PERSON

Manufacturing operations which are detailed on the MIA should only be performed at the authorised site address. Batch certification is a manufacturing operation which is specified on the manufacturer's authorisation and it is expected that the Qualified Person (QP) is present at the authorised site when performing batch certification unless otherwise approved on the MIA by the HPRA. A pre-requisite for HPRA approval of remote batch certification on an MIA is a satisfactory inspection following on-site batch certification activities being undertaken. This would normally occur one to three years post the first inspection at the site. Where approved, a clarifying remark is added to the MIA stating 'Authorised operations include remote batch certification by a Qualified Person when operating within the EEA or Northern Ireland'.

MIA holders applying for a variation to include remote batch certification by QPs should submit the following supporting documents:

- Signed declaration on behalf of the MIA holder to confirm that certification, when performed remotely, will only be performed by Qualified Persons when operating within the EEA (or Northern Ireland).
- Summary of the means by which the QP will maintain familiarity and current knowledge in relation to the products, manufacturing process(es), the pharmaceutical quality system at the manufacturing site and its effectiveness in relation to the products concerned. This should include details of when QPs who are operating remotely will be required to attend at the authorised manufacturing site. The time spent on the site should be commensurate with the nature and frequency of manufacturing operations conducted at the site.
- Details of how the MIA holder will facilitate the QPs to perform their duties remotely and in a secure manner including:
 - o Summary description of how it will be ensured that the QPs can access the same information concerning the manufacture and control of batches as would be provided if carrying out the duties at the authorised manufacturing site.
 - o Summary of the remote certification process and means by which the QP will complete the batch register (or equivalent), including reference to relevant procedures in the pharmaceutical quality system. The declaration should clearly state the means by which batch certification will be communicated to the authorised site and what documentation, if applicable, will be forwarded in this regard.
 - o In circumstances where GMP documentation is stored remotely from the site for periods of time, it is considered that risks associated with this practice are assessed and documented, e.g. controls to ensure the integrity of the records, protection from loss, damage, etc. Summary details of how it will be ensured that the HPRA will have access, in

real time, at the authorised manufacturing site, to all relevant information relating to activities by QPs operating remotely and the concerned batches of medicinal product.

QP duties at a manufacturing site may also include providing QP confirmation, as defined in Annex 16 of the EU GMP guide. No variation to the MIA is required in order to perform the QP confirmation activity remotely; however, it is expected that the same principles, as outlined above, would be applied and this will be reviewed during GMP inspections.