Format: QMS/FMT/001 Revision No: 0 Effective Date: 13 Jan 2020	Department/Division	Food and Drugs Inspection and Safety Monitoring Department
Document Type: **Standard Operating Procedure**		Doc. Number : DIS/SOP/138 Revision Number : 0 Revision Date : 09 Jul 2021 Effective Date : 16 Jul 2021 Review Due Date : 16 Jul 2024
RWANDA FDA Rwanda Food and Drugs Authority	Title: **CONDUCTING GMP INSPECTIONS OF PHARMACEUTICAL MANUFACTURING FACILITIES**	

	Author	Checked by		Approved by
Title	GML&GLP Analyst	Quality Assurance Analyst	DM/FDIC	HoD/FDISM
Names	Fiona MURENZI PADUA	Dr. Vedaste HABYALIMANA	Dr. Marilyn M. MURINDAHABI	Alex GISAGARA
Date	16/07/2021	16/07/2021	16/07/2021	16/07/2021
Signature				

1.0 Purpose

This Standard Operating Procedure is to:

1.1 A standardized procedure is followed by all inspectors when performing GMP inspections
1.2 To ensure consistency in performance between different GMP inspectors.
1.3 To ensure that GMP inspectors are equipped with relevant tools to carry out the GMP inspection.

2.0 Scope

This Standard Operating Procedure:

2.1 Applies to conducting GMP inspections for manufacturers of Finished Pharmaceutical Products (FFPs) and of Active Pharmaceutical Ingredients (APIs) applied within the Rwanda FDA.

3.0 Policy

3.1 GMP Guide – PE 009-13 (Part I), Pharmaceutical Inspection Cooperation Scheme, 1 January 2017, PIC/S Secretariat, Geneva.

3.2 Law No. 003/2018 of 09/02/2018 establishing Rwanda FDA, determining its mission, organization, and functioning states in:

Article 8 (2) ...” regulate compliance with quality standards relating to the manufacture”; and

Article 9 (2) …” grant or withdraw authorization relating to matters regulated under this law”.

3.3 Regulations No DIS/TRG/001 Rev. No 0 governing authorization to operate as a manufacturer or wholesaler or small scale manufacturing / compounding or retail seller of pharmaceutical products, 2019, Rwanda Food and Drugs Authority, Kigali, Rwanda.

3.4 Guidelines N^0 DIS/GDL/003 Guidelines on Good Manufacturing Practices on Pharmaceutical Products Annexes issued by Rwanda FDA

3.5 Rwanda FDA Guidelines on Good Manufacturing Practice for Finished Pharmaceutical Products-Part1: Document Ref: DIS/GDL/002, Effective Date: 01/10/2020, Revision: 0

3.6 Rwanda FDA Guidelines on Good Manufacturing Practices on Pharmaceutical Products-annexes. Document Ref: DIS/GDL/003, Effective Date: 05/10/2020, Revision: 0

4.0 Definition and Abbreviation

4.1 **“GMP”**: Good Manufacturing Practices

4.2 Good manufacturing practices (GMP) is a system for ensuring that products are consistently produced and controlled according to quality standards.

4.3 “**GMP inspection”** means an **on-site assessment, conducted at a manufacturing facility** of pharmaceutical products to confirm compliance with Mandatory GMP Requirements.

4.4 **“Lead GMP Inspector”** is a Senior GMP Inspector who is charged with the responsibility for leading a GMP inspection team to undertake inspection of a specified pharmaceutical manufacturing site(s)

RWANDA FDA
Rwanda Food and Drugs Authority

5.0 Responsibility

5.1 The Director General is responsible for ensuring that GMP inspections are conducted in a timely manner and in accordance with the national legislation to protect public health.

5.2 The Division manager of Food and Drugs Inspection & Compliance is responsible for ensuring that GMP inspections are conducted in a consistent manner and appropriate actions taken in light of findings of the GMP inspection.

5.3 The GMP analysts are responsible for ensuring that inspection is conducted and reports submitted in time for peer review.

5.4 The Lead GMP inspector is responsible for organizing, coordinating and leading during all stages of the inspection and acting as spokesperson, in accordance with the legislation and Rwanda FDA GMP guidelines

5.5 The inspection Team member (s) are responsible for assisting the lead GMP inspector in conducting the GMP inspection in accordance with the Legislation and Rwanda FDA GMP guidelines and in generating a GMP inspection report.

5.6 The GMP inspection Team is responsible for:

a) Conducting a GMP inspection
b) Agreeing on the inspection's scope
c) Discussion and resolving, where possible, any major problems which may occur during the inspection process;
d) Ensuring that all inspectors play an active role in the inspection process
e) Making decisions on inspection findings by way of consensus; however, where this is not possible, the Lead GMP Inspector makes the final decision;
f) Preparing an inspection report
g) Conducting any follow-up measures; and
h) Rating the inspected site in relation to compliance to GMP requirements.

5.7 Quality assurance analyst ensures the use of update version of the SOP, recalls obsolete documents and keeps document master list.

5.8 GMP Analyst is responsible for:

a) Coordinating the exchange of information between the Drug and Food Assessment and Registration department and the Lead GMP inspector, and
b) Providing the GMP inspectors with the necessary documentation and logistics for the inspection
c) Maintaining all GMP related products

RWANDA FDA
Rwanda Food and Drugs Authority

6.0 Distribution

6.1 Director General
6.2 The Head of Food and Drugs Inspection and Safety Monitoring Department
6.3 Division Manager of Food and Drugs Inspection and Compliance
6.4 Quality assurance analyst
6.5 GMP Inspectors.

7.0 Safety Precautions

GMP inspectors should always have identification at all times during the inspection process

8.0 Materials and equipment

8.1 Laptop computers
8.2 Rwanda FDA GMP inspection notebooks
8.3 Pens with indelible blue or black ink
8.4 Rwanda FDA Inspector's Identity cards
8.5 Rwanda FDA business cards
8.6 GMP inspection Checklist
8.7 Updated list of countries considered as Stringent Regulatory Authorities (SRA)

9.0 Procedures

9.1 The Inspectors should identify themselves at the entrance of the site before entering the inspection site
9.2 All inspections should be started with an opening meeting. See Annex I: for guidance on what should be covered during the meeting.
9.3 Confirm the inspection plan to the company and refer to the standard(s) against which the inspection will be done.
9.4 Circulate the attendance record form at Annex II to enable all persons present to record names, positions in the company and email address.
9.5 Conduct the inspection through assessment of compliance with GMP according to the inspection plan. Adjust the inspection plan if necessary.
9.6 During routine inspections all aspects described in the GMP guidelines should be assessed as far as possible. Emphasis should be placed on specific areas based on a risk approach and time allocated accordingly.
9.7 Verify selected source data where possible. This is done by requesting documentation, records and raw data. It may be helpful to make a list of documents requested to ensure that all requested are provided and reviewed. See Annex III - optional.
9.8 Maintain notes during the inspection and keep this record for filing on the company file after completion of the inspection.
9.9 Observations should be discussed with the company representatives at the time that they are noted.

RWANDA FDA
Rwanda Food and Drugs Authority

9.10 In addition, provide feedback to the company / laboratory / organization on the observations (deficiencies) made during the inspection. This should normally be done at the end of each day. Nº deficiencies should be included in the report if these were not mentioned / discussed with the company.

9.11 At the end of the inspection, arrange for a closed meeting between inspectors to discuss the deficiencies in preparation for the closing meeting.

9.12 End the inspection with a closing meeting where the lead inspector should summarize the findings with the representatives of the company. The importance of the deficiencies should be mentioned. See Annex I for guidance on what should be covered during the meeting.

9.13 At any stage during the inspection, if serious deficiencies are observed that may lead to possible serious risk to patients, the Lead Inspector should immediately contact the Head, Regulatory body and Head of GMP Inspectorate (as appropriate for each country) to decide what action should be taken. The company should be so informed.

9.14 The inspection plan, meeting attendance record, notes made during the inspection, any checklists used, record of documents requested (if used), copies of any documents requested during the inspection, should be filed on the company file after the inspection report has been prepared and sent to the company. (Annex III)

9.15 All documents mentioned in the section 9.1 should be filed in the company file by the relevant GMP inspection team leader of who arranged the inspection.

10.0 References

10.1 EAC SOP for conducting GMP inspections, 2014

10.2 PIC/S standard Operating Procedures on Team Inspections, PI 031-1, 29 July 2009

10.3 Rwanda FDA guidelines on Good Manufacturing Practices on Pharmaceutical Products

10.4 WHO PQP SOP 403.1; Conducting an inspection

RWANDA FDA
Rwanda Food and Drugs Authority

11.0 Appendices

11.1 Annex 1: Guidance points for opening and closing meeting

11.2 Annex II: Record of persons present in the opening and closing meeting

11.3 Annex III: Record of documents requested during an inspection (optional)

ANNEX 1: <u>GUIDANCE POINTS FOR OPENING AND CLOSING</u>

MEETING

Opening meeting

Opening the meeting should at least include but not limited to the following;

- Introduction of the inspectors
- Ask the company to introduce the people present and to make a brief presentation
- Explain how the inspection is to be conducted
- Scope of the inspection
- Inspection plan
- Discuss Inspection Time Table
- How the feedback will be given e.g. end of each day
- Which are the standards that will be applied (EAC- GMP)

Closing meeting

- Thank the company for their cooperation
- Provide brief feedback on some of the positive points noted in the inspection
- Explain the process and timelines for the report and corrective action plan
- Explain that the closing meeting allows providing a summary of the observations made - and the intention is not to list each observation

(Note: You should have discussed the observations made at the end of each day or at some point during the inspection. No surprises in the inspection report!)

- Provide a summary of issues of concern under different areas such as:
  - Quality Assurance
  - Documentation
  - Personnel
  - Premises
  - Equipment
  - Materials
  - Cleaning/sanitation/Hygiene
  - Production
  - Quality control
  - Validation
  - Utilities
  - Mention, if relevant, whether there are any critical or major deficiencies
  - Ask if the company needs clarification on any point

RWANDA FDA
Rwanda Food and Drugs Authority

ANNEX II: RECORD OF PERSONS PRESENT IN THE OPENING AND CLOSING MEETING

Manufacturer:	**Address:**
Inspector(s):	
Opening meeting Date: Time:	**Closing meeting** Date: Time:

To be completed by representatives of the manufacturer:

Name (please print)	Position in the organization	E-mail address	Signature

RWANDA FDA
Rwanda Food and Drugs Authority

ANNEX III: RECORDS OF DOCUMENTS REQUESTED FOR DURING THE INSPECTION

Manufacturer:

Inspector:

Date:

s/n	Document	Document no.	Time requested	Time presented
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				

RWANDA FDA
Rwanda Food and Drugs Authority

12.0 Document Revision History

Date of revision	Revision number	Author(s)	Changes made and/or reasons for revision
16 Jul 2021	0	Rwanda FDA Staff	First Issue

End of Document

RWANDA FDA
Rwanda Food and Drugs Authority