U.S. Food and Drug Administration

Department of Health and Human Services

CENTER FOR BIOLOGICS EVALUATION AND RESEARCH

Global Harmonization: GMP Compliance Issues

PDA/FDA Joint Meeting
September 26, 2007
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Office of Compliance and Biologics Quality

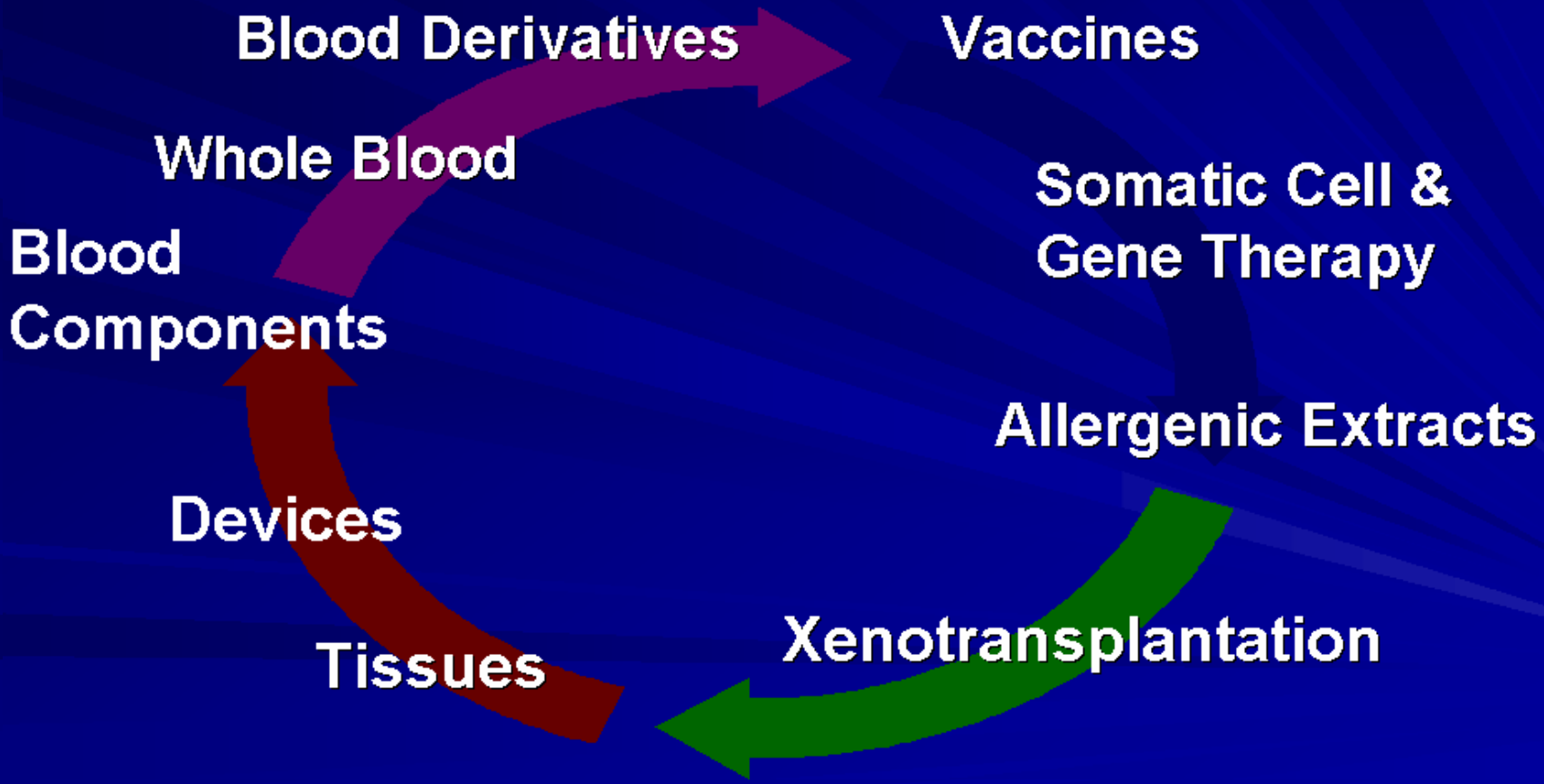
Vision for CBER

INNOVATIVE TECHNOLOGY ADVANCING PUBLIC HEALTH

CBER uses sound science and regulatory expertise to:

- **Protect and improve public and individual health in the US and, where feasible, globally**
- **Facilitate development, approval and access to safe and effective products and promising new technologies**
- **Strengthen CBER as a preeminent regulatory organization for biologics**

Critical Products for Public Health, National Preparedness & 21st Century Medicine

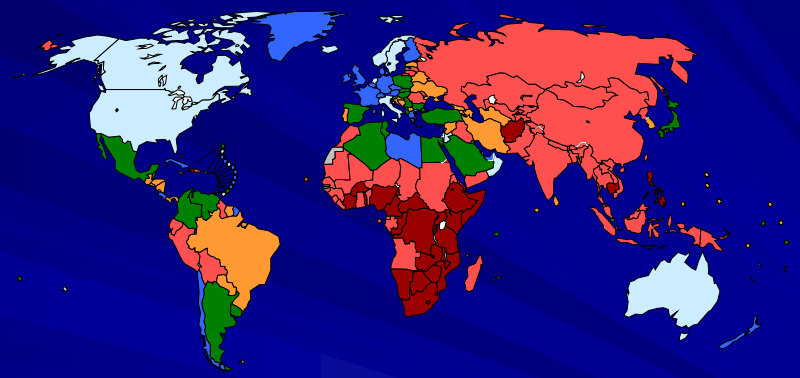


Global Collaboration

- CBER is a WHO Collaborating Center
  - Expert Committee on Biologic Standards
  - Strategic Advisory Group of Experts
  - Global Advisory Committee on Vaccine Safety
  - Expert consultation in specific product areas (e.g., HIV, HPV, rotavirus, pneumococcal conjugate, influenza vaccines)
    - Drafting WHO guidelines for clinical, non-clinical, and product quality evaluation of vaccines by national regulatory authorities

Global Collaboration

- Participates in WHO teams to assess competency of national regulatory authorities (NRA) around the world
- Training: Works with WHO Developing Countries Network to help build global regulatory capacity of NRAs to evaluate vaccine development and licensure



Global Collaboration

- Leadership role of FDA, together with WHO and Health Canada, in Pandemic Influenza Vaccine Regulators Initiative
  - Develop convergence on data needed to evaluate pandemic influenza vaccines
  - Two regulators meetings held in 2006 and WHO issued draft document for comment
  - Third meeting held in 2007 to work toward finalization of document

Global Collaboration

- International Conference on Harmonisation
- Pharmaceutical Inspection Cooperation/Scheme
  - Very active in Blood and Tissue Expert Circles
- Partnering with WHO and NGOs to explore additional means of providing global regulatory assistance/capacity building

Partnering

- Information sharing agreements with other regulatory authorities (e.g., EMEA, Health Canada, and others) and engagement in priority areas (e.g., pandemic influenza vaccines) to facilitate global product development plans
- Have been extremely valuable for communication/discussion of GMP/compliance issues

CGMP Harmonization Analysis Working Group

- Formed in June 2003 as part of the agency's "Pharmaceutical cGMPs for the 21st Century - A Risk-Based Approach" initiative.
- This working group performed a formal analysis of 21 CFR parts 210 and 211 against the GMPs of the European Union (EU), PIC/S, as well as other Agency CGMP regulations to identify the differences and consider the value of adding or changing the current regulations.

CGMP Harmonization Analysis Working Group

- The working group concluded that there are many more similarities than differences among the various regulations
- For example: the EU GMPs have explicit requirements for separate areas for maintenance workshops and weighing of materials, whereas 21 CFR 211.42(c) requires that operations be performed within specifically defined areas of adequate size.
- Where differences exist, the working group found that they can often be explained by unique aspects of the specific product subject to the regulation

CGMP Harmonization Analysis Working Group

- Based on the working group's analysis, the Agency decided to take an incremental approach to modifying parts 210 and 211 while pursuing international harmonization through ICH and PIC/S.
- The GMP Regulations Work Group was formed in 2005 to implement modifications to 21 CFR parts 210 and 211

GMP Regulations Work Group: Goals and Tasks

- Determine modifications; the ultimate goals of the modifications will be to encourage timely detection and response to emerging defects or indications that product quality has been compromised; to provide further clarity and modernize the regulations; and to harmonize various aspects of parts 210/211 with other Agency regulations and regulations of our international counterparts.
- Withdraw the 1996 proposed amendments to parts 210/211
- Implement incremental changes to parts 210/211 through rulemaking

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