Santé Canada Health Canada

Canada

Health Canada Mutual Recognition Agreement (MRA) Programme

Presentation to Association of Food and Drug Officials (AFDO)

Kimby Barton, Health Canada

June 9, 2018

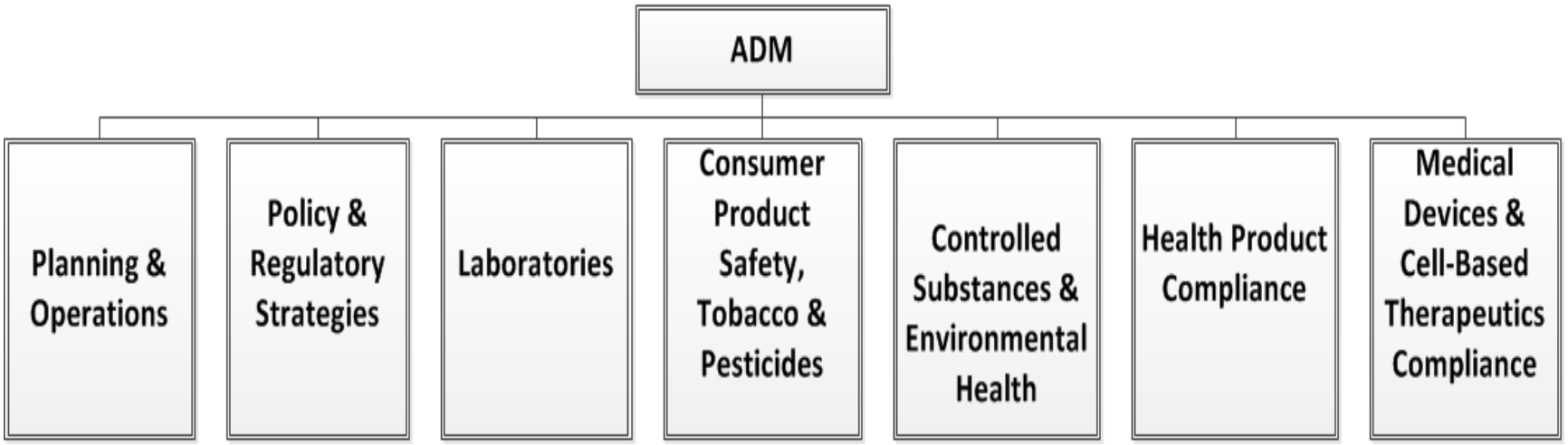
VOTRE SANTÉ ET VOTRE SÉCURITÉ... NOTRE PRIORITÉ.

Overview

- Regulatory Operations and Regions Branch (RORB)
- Profile of Canadian Industry
- Drug GMP Inspection Programme
- Mutual Recognition Agreement Programme

RORB Organizational structure

Health Canada's Regulatory Operations and Regions Branch (RORB) is the Canadian federal authority responsible for the post-market compliance and enforcement of health products, consumer products and pesticides.



Horizontal clusters

Delivery clusters

Program clusters

HPCD's Mandate

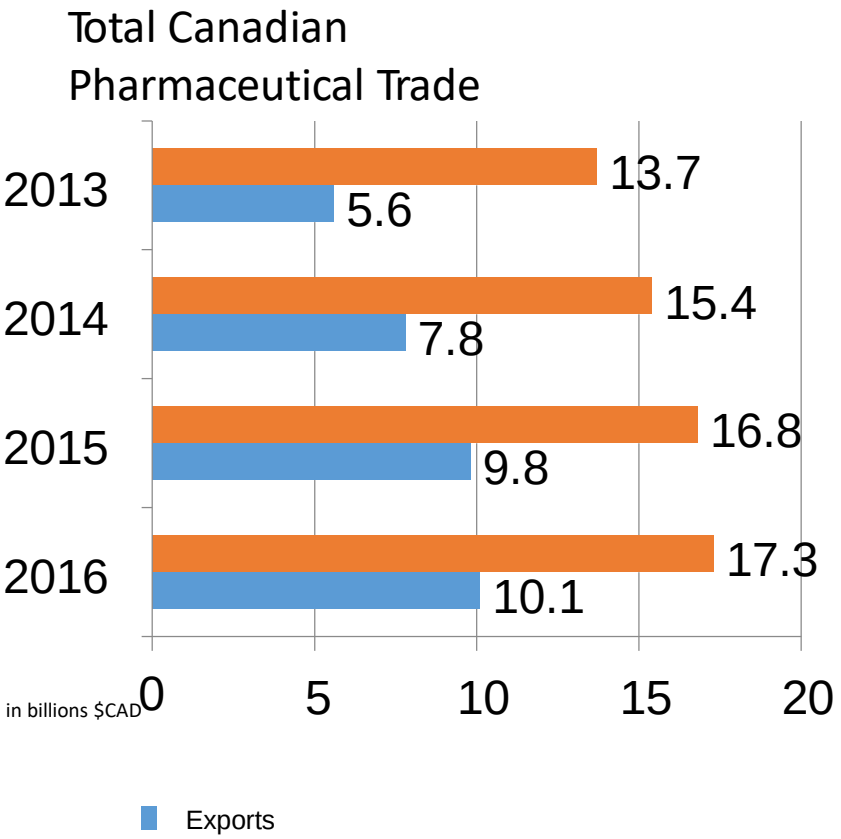
HPCD is responsible for administering a national compliance and enforcement program to verify compliance and act on non-compliance for all drug products within the scope of the *Food and Drugs Act.*

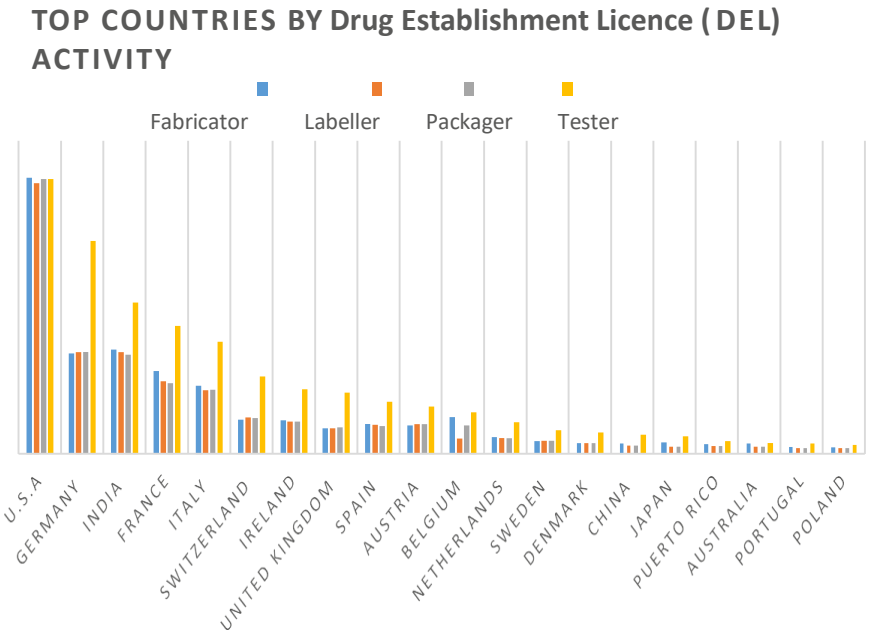
HPCD is the program cluster responsible for Drug Establishment Licensing, Good Manufacturing Practices Inspections, Good Pharmacovigilance Inspections, Compliance Verification (domestic and border), etc.

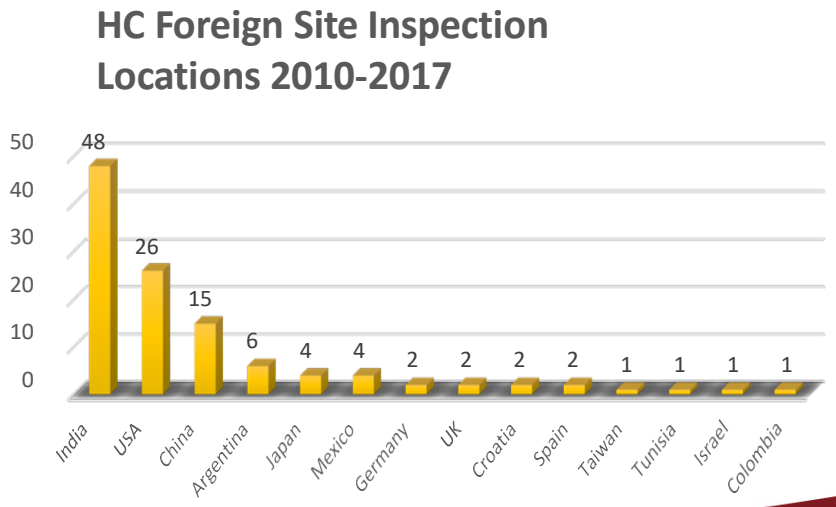
HPCD has two divisions:

- Health Product Inspection and Licensing Division (HPIL);
- Health Product Compliance and Risk Management Division (HPCRM).

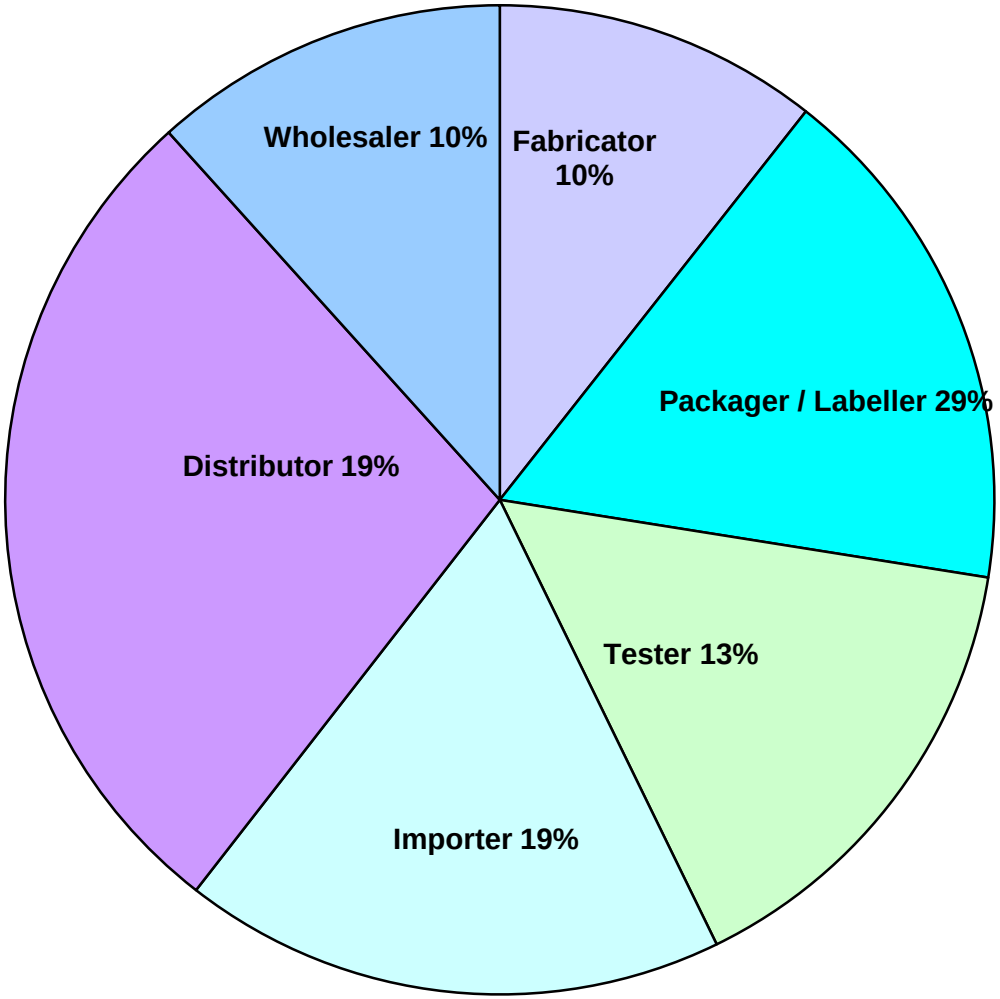
International Context







National Distribution of Licensed Establishments by Activity



Canadian Metrics

- Canada imports ~60% of its health products
- 80 inspector resources dedicated to drug GMP inspections
- 770 Drug Establishment Licences issued/year
- ~450 domestic Drug Establishment inspections/year
- ~40-45 foreign inspections/year
- ~600 paper assessments per year

Overview of the Canadian Drug Good Manufacturing Practices (GMP) Inspection Program

Canadian Good Manufacturing Practices (GMP)

- What are Good Manufacturing Practices (GMP)?

- Set of principles related to quality assurance that helps in ensuring that drugs are consistently produced, controlling the quality standards appropriate to the intended use of the drug, and meeting the specifications required by the marketing authorization.

Canadian Good Manufacturing Practices (GMP)

- In Canada these requirements are defined in Part C, Division 2 of our Food and Drug Regulations.

- Prohibition on sale (Products for sale must be GMP Compliant)

- C.02.003. No distributor referred to in paragraph C.01A.003(b) and no importer shall sell a drug unless it has been fabricated, packaged/labelled, tested and stored in accordance with the requirements of this Division.

Canadian Good Manufacturing Practices (GMP)

Places

- Premises
  C02.004
- Equipment
  C02.005

People

- Personnel
  C02.006
- Quality Control Department
  C02.013, C02.014 & C02.015

Processes

- Sanitation
  C.02.007 & C02.008
- Manufacturing Control
  C02.011 & C02.012
- Records
  C02.020-C02.024

Products

- Raw Material Testing
  C.02.009 & C02.010
- Packaging Material Testing
  C.02.016 & C02.017
- Finished Product Testing
  C02.018 & C02.019
- Samples
  C02.025 & C02.026
- Stability
  C02.027 & C02.028
- Sterile Products
  C02.029

Mutual Recognition Agreement (MRA)

Objectives of the MRA

- Reduce international trade barriers, without diminishing the high standards of drug product safety and quality.
- Develop infrastructure for on-going communications to ensure the maintenance of equivalency as well as effective communication for rapid alerts on deficiencies, defects and recalls.

- Develop an international system of regulatory cooperation that will enhance communications and stronger relationships between regulatory authorities.

- Recognition of mutual expertise to create efficiencies that can allow resources to be better utilized for other high priority/risk projects.

Parameters of the MRA

- The components and mechanisms included in the GMP compliance programme

- The components and mechanisms of the "two-way" alert programme.

- The operational phase
  - once designated equivalent, the importation and exportation of drugs is facilitated by an exchange of a regulatory certificate of compliance (CoC) between the Regulatory Authorities (RA) involved.
  - Batch certification by the manufacturer on the conformity of each batch is recognized by the other Party without re-control/re-testing at import.

- The maintenance programme

Benefits of the MRA

- It is a simple exchange of Certificates of Compliance (CoC) between regulators, as opposed to exchanging inspection reports, or conducting foreign inspections.
  - ~800 Certificates of Compliance (CoCs) received per year, for sites in MRA countries;
  - ~25 CoCs issued per year for Canadian sites

- Support better mutual reliance among international partners to Health Canada:
  - performing joint inspections of foreign sites of common interest with international partners such as USA, Australia, United Kingdom
  - aligning practices and processes related to Desktop assessments of applications (DTA) programs under the Pharmaceutical Inspection Coordination Scheme (PIC/S)
  - sharing international inspection plans (PIC/S and EU-Eudra GMP database)

- Benefits the general public by providing the choice of a wide variety of high quality safe drugs.

Scope of products

	EC	Switzerland	EEA-EFTA	Australia
Prescription and non-prescription drugs (human use)	**Y**	**Y**	**Y**	**Y**
Medical Gases	**Y**	**Y**	**Y**	**Y**
Human Biologics	**Y**	**Y**	**Y**	**Y**
Human Radiopharmaceuticals	**Y**	**Y**	**Y**	**Y**
Prescription and non-prescription drugs (veterinary use) and drug premixes	**Y**	**Y**	**Y**	**N**
Drugs used in Clinical Trials	**Y***	**Y***	**Y***	**N**
NHPs	**Y****	**Y****	**Y****	**N**

* = manufacturing sites must already hold an EL.

** = MRA partners provide CoCs. In Canada, regulatory amendments are being prepared that will allow NHP companies to hold an EL.

Evaluation process

There are 11 components of a GMP compliance program:

- Legislation and Regulations
- Directives and Policies
- GMP Standards
- Inspection Resources
- Inspection Procedures
- Inspection Performance Standards
- Enforcement Powers and Procedures
- Alert and crisis Systems
- Analytical Capability
- Surveillance Programme
- Quality Management Systems

* Supported by 25 evaluated sub-components and 78 indicators.

Evaluation Process

Comprehensive standardized method for evaluating a GMP compliance program of a Regulatory Authority:

- Documentation review
- On-site evaluation at the Inspectorate
- On-Site evaluation at the Laboratories
- Observation of GMP inspections
- Reports

Maintenance Programme

The continuous monitoring of the GMP compliance program:

- Joint Sectoral Group Meetings (JSG)
- Annual exchange of reports between Regulatory Authorities identifying any changes to GMP compliance program
- Joint GMP Technical Meetings
- Periodic re-assessment
- Re-evaluation (following serious changes or concerns)

The Canadian MRA Partners – 32 countries*

		Signed	Evaluation	Operational
European Union		1998	1998-2003/ 2005- …	Feb. 2003 On-going
Switzerland		1998	1998-2000 2003-2005	June 2000
EEA-EFTA (Norway, Iceland, Liechtenstein)		2000	2001-2002	Nov. 2002
Australia		2005	2001-2002	Jan. 2006

***Latvia and Bulgaria (EU) are not yet recognized equivalent**

Contact Information

Kimby Barton, Director
Phone number: (613) 954-2996
Email: kimby.barton@canada.ca

Ms Louise Kane, Manager
Phone number: (450) 928-4209
Cell phone: (514) 217-5047
Email: louise.kane@canada.ca

Reference:

https://www.canada.ca/en/health-canada/services/drugs-health-products/compliance-enforcement/international/mutual-recognition-agreements/updates.html