The European Association of Pharmaceutical Full-line Wholesalers

Groupement International de la Repartition Pharmaceutique

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2014 Pharma LawConvention
PARALLEL TRADE / DISTRIBUTION OF MEDICINES
Good Distribution Practice (GDP)
Bucharest, Romania
3rd April 2014

the vital link in healthcare

About GIRP

750+ pharmaceutical wholesalers

32 European countries

safe and efficient supply to more than

170,000

pharmacies and healthcare professionals

140,000 employees

100,000 | PRODUCTS

3,500 | MANUFACTURERS

the premier platform reaching across Europe and beyond with expertise and experience for our partners' excellence

quality, integrity, excellence

GIRP members are trusted supply chain partners

the vital link in healthcare

Full-line Wholesalers

The vital link in healthcare

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Performing a Public Service Obligation/ Function

▶

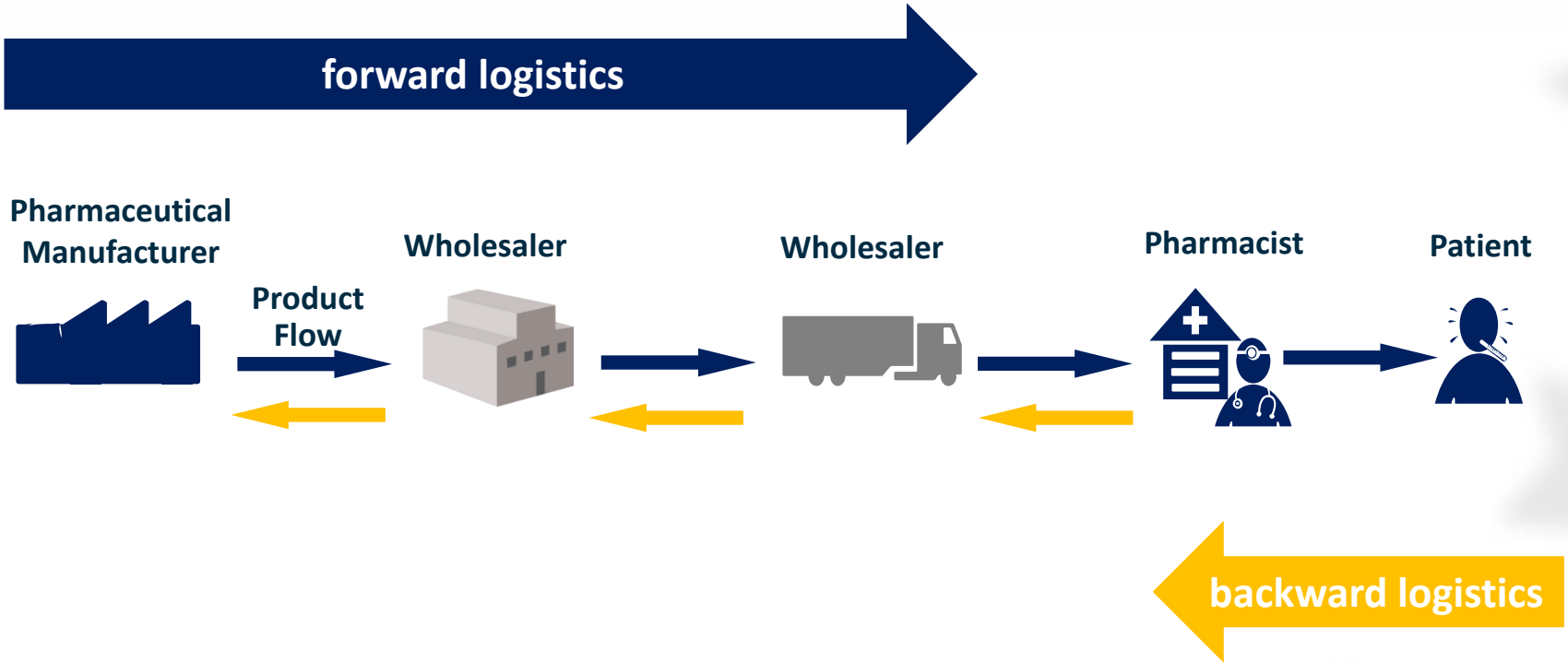
Solidarity

The core activity of pharmaceutical full-line wholesaling consists of

- purchase and sale;
- warehousing storage; order preparation;
- and delivery of medicines.

Pharmaceutical full-line wholesalers carry and distribute the full assortment of products (in range and depth) to meet the needs of those with whom they have normal business relations and to deliver all medicines needed, in their geographical area of activity, within a very short period of time.

Product flow



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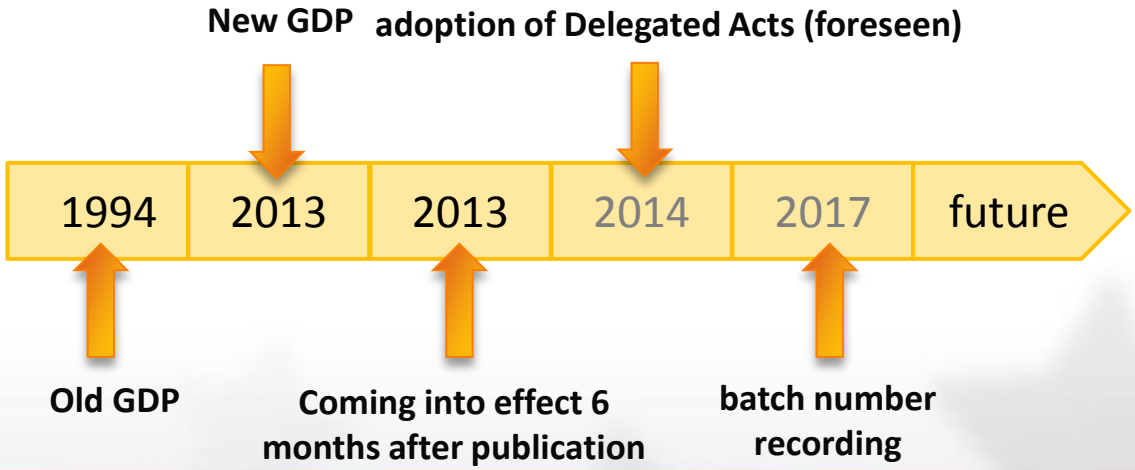
Comparison of GDP versions

New provisions and impact on wholesalers

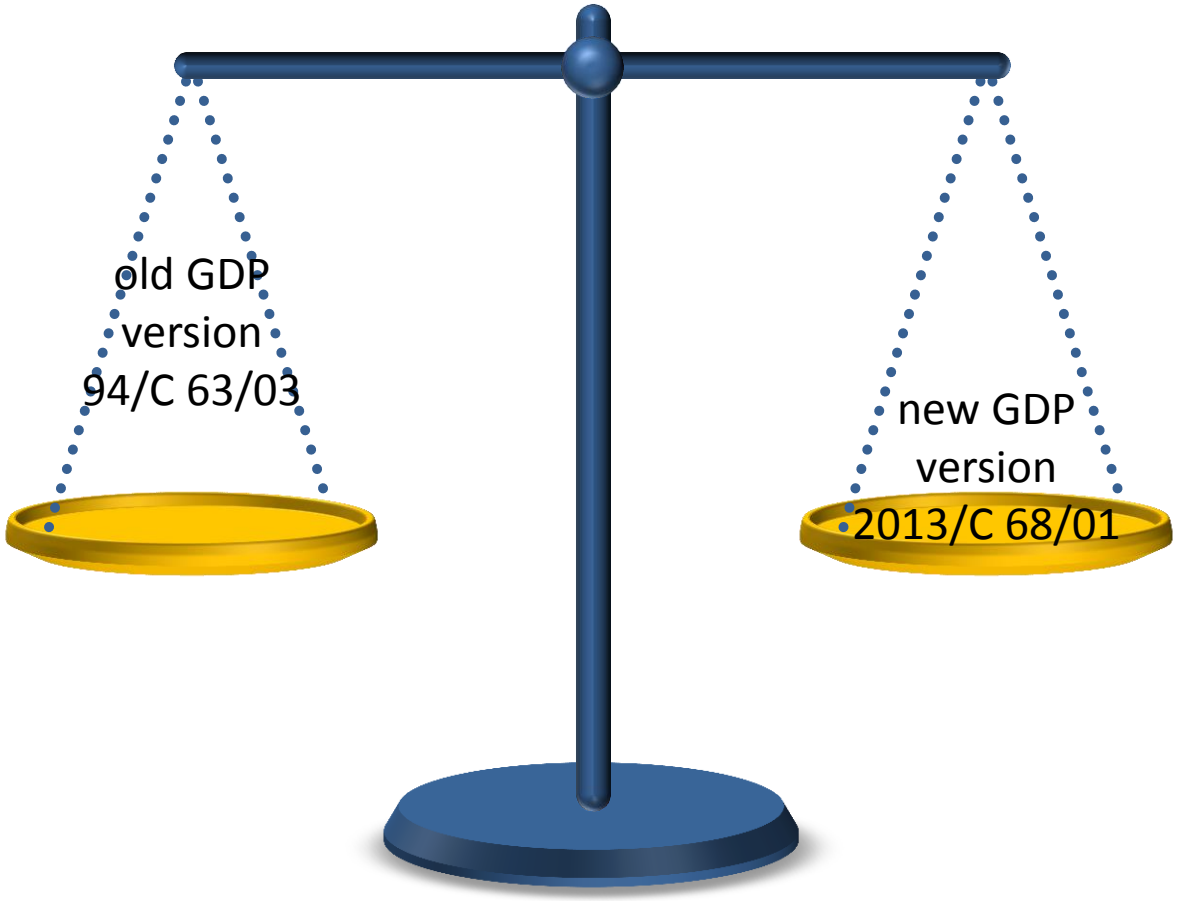
Future expectations

Timeframe

- published on 8th March 2013 in the Official Journal of the EU
- re-published on 5th November 2013 in all EU languages
- replace the GDP guidelines dating from 1994, after having been in force for 19 years
- came in force 6 month after publication (or earlier depending on national legislation) on 8th September 2013 / 5th November 2013
- recording of batch numbers at least for products carrying safety features: 3 years after the Delegated Acts complementing the Falsified Medicines Directive are adopted by EC (foreseen for 2014)



Comparions of GDP versions



Comparison of GDP versions

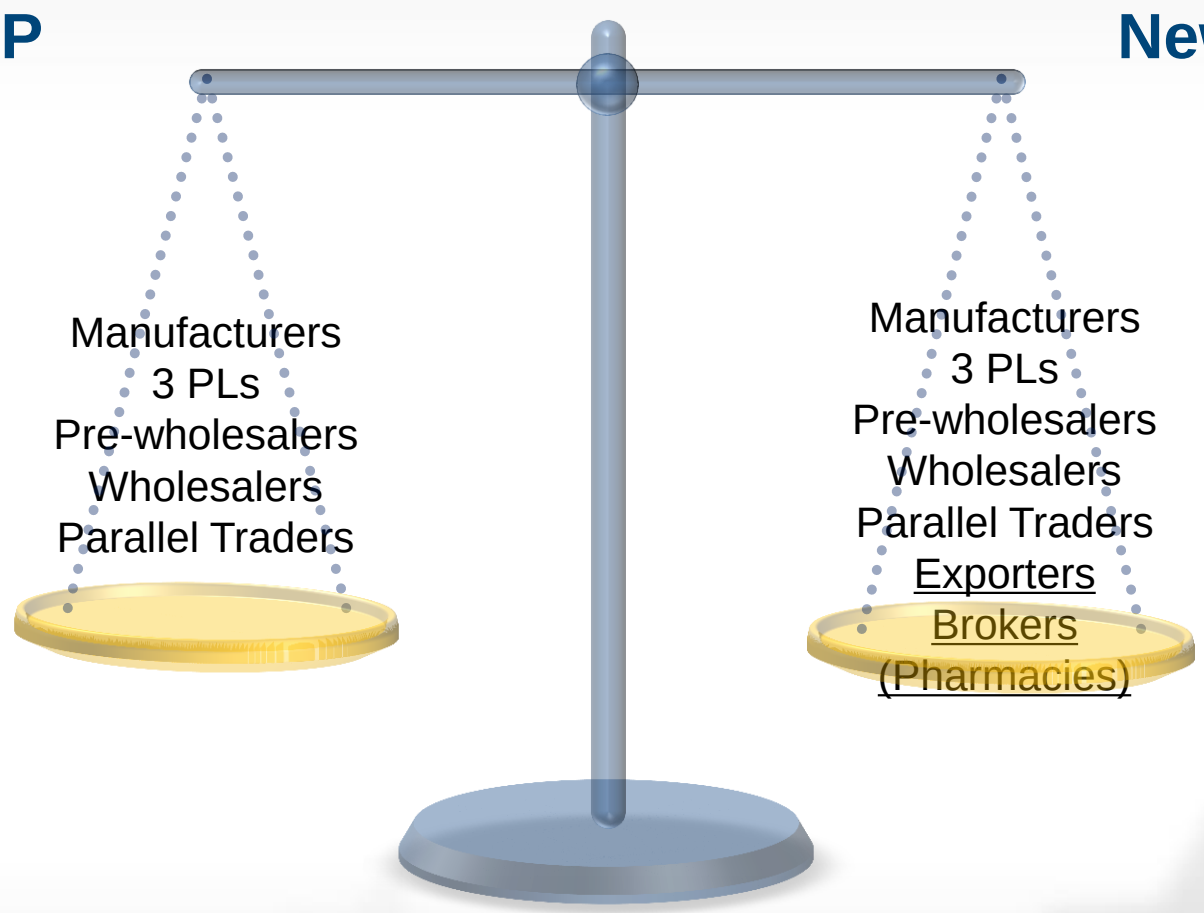
Old GDP

Document 94/C 63/03
Published in 1994
4 pages
6 chapters

New GDP

Document 2013/C 68/01
Published in 2013
14 pages
10 chapters

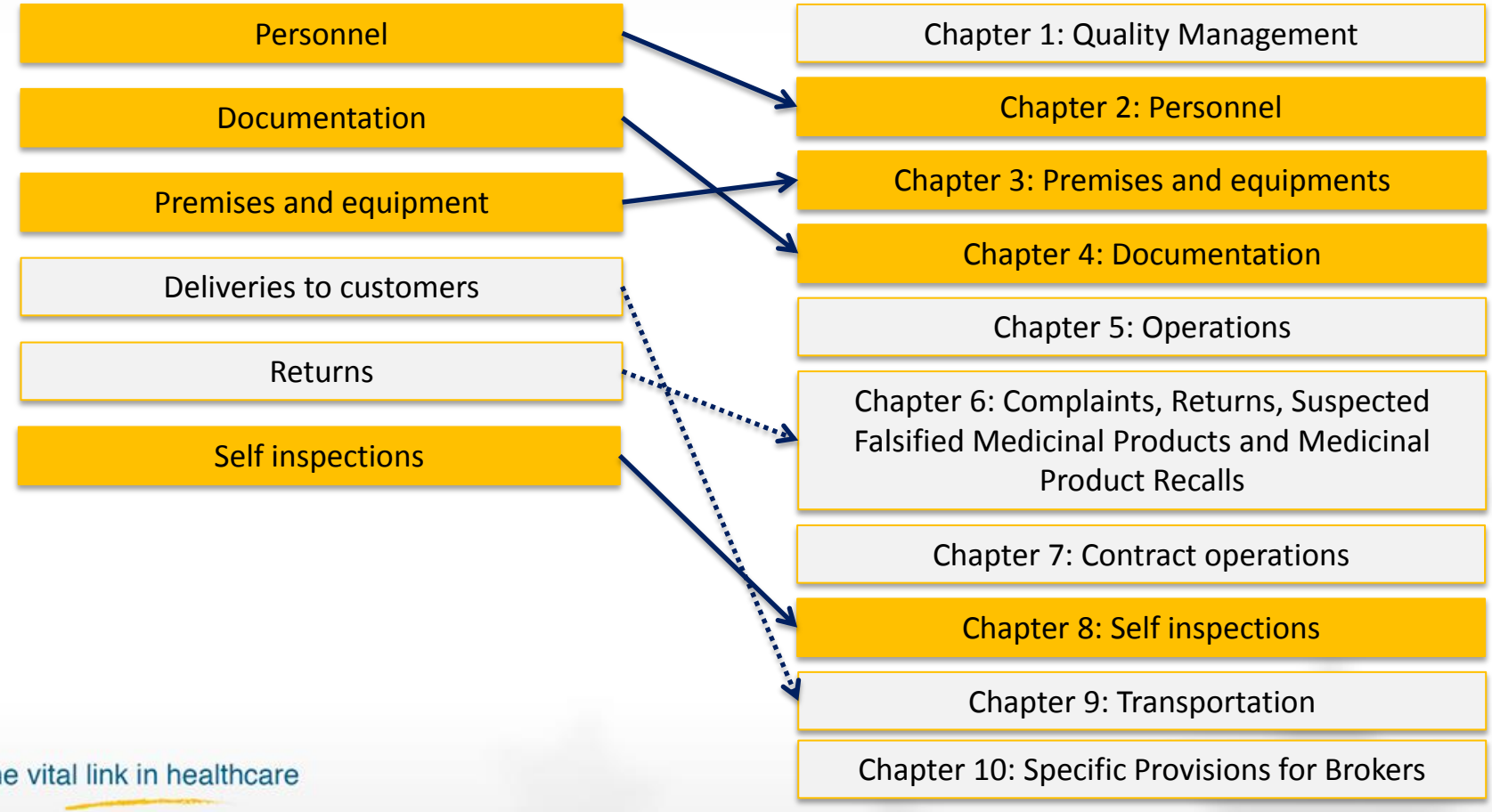
Scope of GDP versions



Good Distribution Practice

- GDP is that part of quality assurance which ensures that the quality of medicinal products is maintained throughout all stages of the supply chain from the site of manufacturer to the pharmacy or person authorised or entitled to supply medicinal products to the public
- It includes the storage and transportation of active pharmaceutical ingredients, other ingredients and packaging components used in the production of the medicines

Structure of GDP versions



Key new areas in GDP

Chapter 1: Quality Management

- Detailed quality and quality risk management system instead of standard operating procedures
- Corrective and preventive actions (CAPA)
- Change Management

Chapter 2: Personnel

- Responsible Person instead of Management Representative
- Staff trained in GDP
- Procedures for personnel hygiene

Chapter 3: Premises and equipment

- Broadened control of environmental conditions
- Temperature mapping
- (Electronic) segregation of medicines stock
- Qualification and validation of key equipment & computer systems incl. CAPA

Chapter 4: Documentation

- Extended documentation requirements
- Batch number recording for at least those products carrying safety features
- Version control procedures for documentation

Chapter 5: Operations

- Verify suppliers authorisations and GDP compliance (incl. Brokers)
- Verification that batches are released for sale
- Monitoring of sales patterns and investigation of irregularities
- Exporters need a wholesaling authorisation
- First Expired First out (FEFO) instead of FIFO

Key new areas in GDP

Chapter 6: Complaints, Returns, Suspected Falsified Medicinal Products and Medicinal Product Recalls	• 10 days acceptable time limit for returns • Returns of cold chain products only possible if adequate storage conditions can be demonstrated • Medicinal products should be unopened
Chapter 7: Contract operations	• Only contract-based outsourcing of activities • Auditing of contract takers for GDP operations
Chapter 8: Self inspections	• Independent external audit is recommended • CAPA to be applied for deficiencies
Chapter 9: Transportation	• No difference between “delivery” and “transport” • Storage conditions = transport conditions as described by the manufacturers or on the outer packaging • Risk assessments of delivery routes to identify when temperature control is needed • Dedicated vehicles to be used where possible; procedures to cover use of non-dedicated vehicles • Maintenance and calibration of temperature equipment • Temperature excursions should be reported and investigated
Chapter 10: Specific Provisions for Brokers	• Quality management system • Comply to GDP provisions as far as relevant

Wholesalers' Points of Adaptation

- Quality and quality risk management systems
- Product segregation
- Qualification and validation of key equipment
- Supplier/customer qualification and verification
- Verification that batches are released for sale
- Product returns
- Temperature control during transport

Quality and quality risk management systems

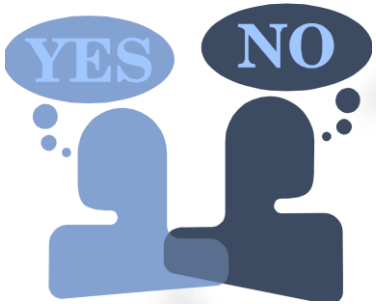
- additional requirements for the operation of QMS such as ISO QMS
- significant impact for smaller wholesalers with basic SOPs
- the QMS requires
  - all distribution activities to be clearly defined,
  - systematically reviewed
  - significant changes to distribution processes to be validated - “change control”
  - take into account the size and structure of the wholesalers’ premises
  - continuous monitoring and documented Management Review
  - being accompanied by a proportional process of quality risk management and
  - be extended to outsourced activities for key processes
- introduction of CAPA where required: similar to GMP requirements

Product segregation

- medicinal products should be stored in segregated (electronic segregation also possible) areas which are clearly marked and have restricted access

- refers to the fact that segregation is needed only when medicinal products are likely to be altered by other products (contamination)
  - ⇨ chaotic storage for medicinal products is possible

BUT contradiction to Chapter 3: ALL medicines should be stored in segregated areas!



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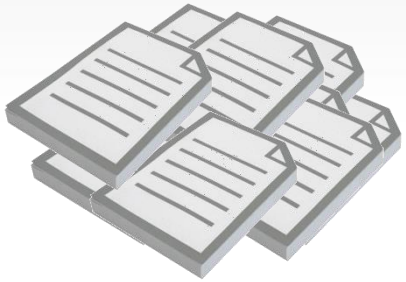
Qualification and validation of key equipment

- involves intensive testing and the recording of test outcomes, incl. computer systems

  ⇨ extensive documentation process



- there is little room for any alternative interpretation to be given to this provision

  ⇨ expected to involve significant costs

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Supplier/customer qualification and verification

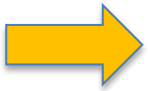
- wholesale distributor to verify the supplier's authorisation and conformity with GDP

can only efficiently be carried out once the EU database of wholesale distribution authorisation holders is established and fully functional and the MAH database reliable

- qualification and approval of suppliers before any procurement of medicinal products

open question: verification of brokering licenses

- wholesalers must ensure that they only supply to authorised wholesalers or persons authorised to supply medicinal products to the public



cannot take place for each transaction and should be given a broad interpretation to ensure that it applies in a limited context when first using a new supplier and on a periodic basis thereafter

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Verification that batches are released for sale

- wholesalers have to obtain assurance that the batches of medicines that they receive are authorised and released for sale by a control report or another proof of release
- the release of batches is the responsibility of the manufacturer
- manufacturer has to provide the corresponding confirmation to the wholesaler
- not current practice

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Product returns

- wholesalers' responsibility when accepting returns has significantly increased – wholesalers have to verify that

  - ✖ Product is unopened and undamaged
  - ✖ Product has been handled correctly
  - ✖ Product has been delivered by this wholesaler

- products requiring specific temperature storage conditions: wholesalers have to seek documented evidence that product has been stored under the authorised storage conditions throughout the entire time – otherwise risk assessment

⇨ impossible to fulfil

⇨ return cold chain products will have to be refused unless documented evidence is provided

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Temperature control during transport 1/3

- wholesalers' responsibility:

  protect medicinal products against breakage, adulteration and theft ✓

  to ensure that temperature conditions are maintained within "**acceptable limits**" during transport ✓

- storage conditions for medicinal products should be maintained during transportation within the defined limits as **described by the manufacturers or on the outer packaging**
- temperature excursion or product damage has to be reported (procedure for investigating and handling temperature excursions)
- risk assessment of delivery routes: to determine where temperature controls are required

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Temperature control during transport 2/3

- 3rd party transportation providers should be made aware of the relevant transport conditions applicable to the consignment

- containers have to:

  bear labels providing sufficient information on handling and storage requirements and precautions

  enable identification of the contents of the containers and the source

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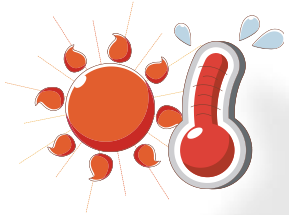
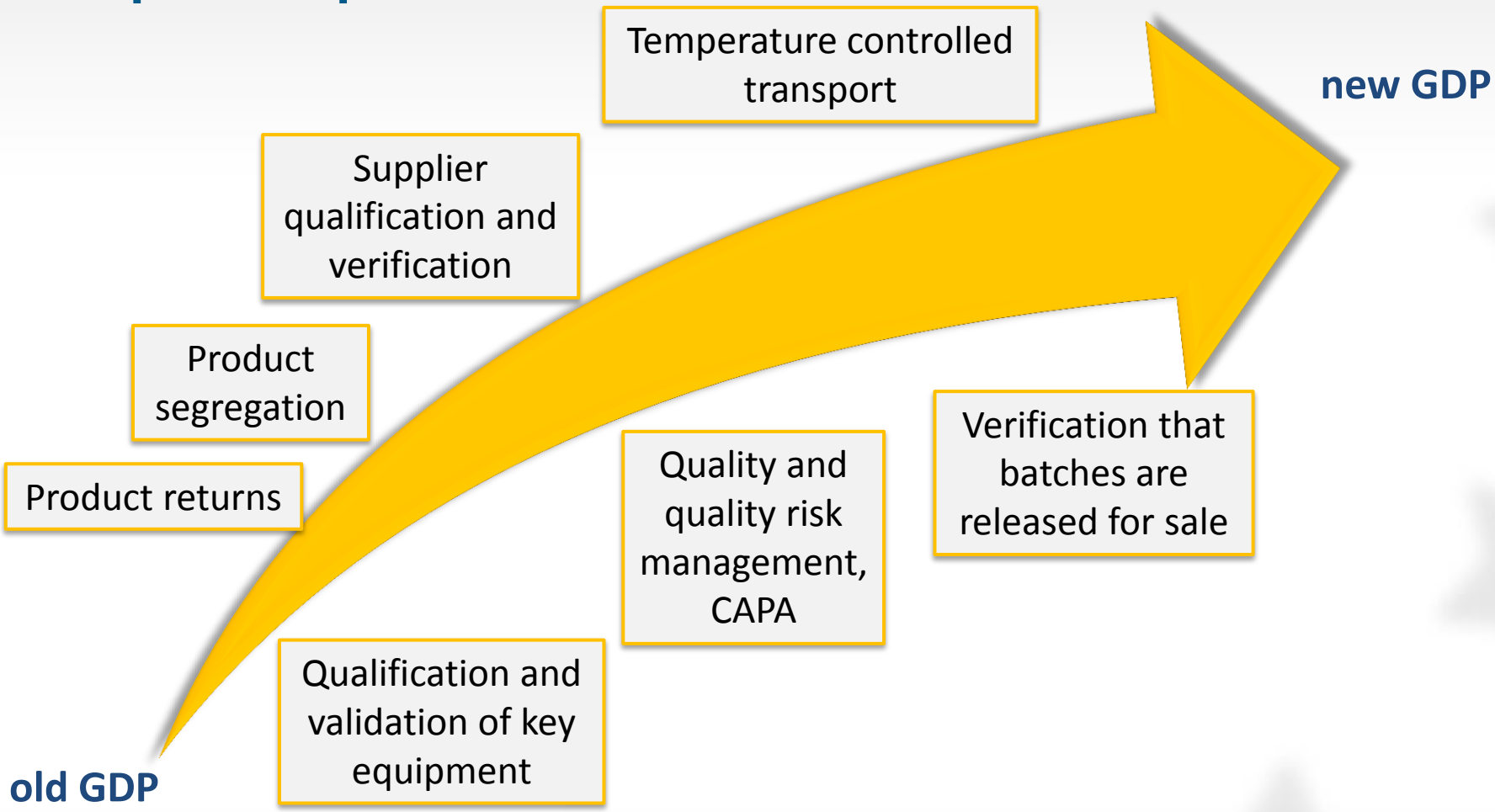
Temperature control during transport 3/3

- temperature-sensitive products: qualified equipment should be used to ensure correct transport conditions are maintained
- temperature-controlled vehicles: temperature monitoring equipment maintained and calibrated at regular intervals + temperature mapping
- wholesale distributors should, if requested, be able to provide “information” to show that the products have complied with temperature storage conditions



⇨ detailed reflections on solutions how to provide this information is ongoing

Impact on pharmaceutical wholesalers



Implementation of the new GDP guidelines… still some food for thought

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