

TANZANIA MEDICINES AND MEDICAL DEVICES AUTHORITY



Tanzania Medicines & Medical Devices Authority

**GUIDELINES ON SUBMISSION OF DOCUMENTATION FOR ESTABLISHMENT
OF COMPLIANCE TO GOOD MANUFACTURING PRACTICES THROUGH DESK
ASSESSMENT; TEMPORARY WAIVER & VIRTUAL INSPECTION OF GOOD
MANUFACTURING PRACTICES OF MEDICINES AND QUALITY AUDIT OF
MEDICAL DEVICES DURING EMERGENCIES**

FIRST EDITION

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Abbreviations

ANVISA	-	Agencia Nacional De Vigilancia Sanitaria, Brazil
CAPA	-	Corrective Actions and Preventive Actions
COVID-19	-	Corona virus Disease of 2019
CSC	-	Clients Service Charter
EAC	-	East African Community
EC	-	European Commission
EMA	-	European Medicines Agency
EU	-	European Union
FPP	-	Finished Pharmaceutical Products
GLP	-	Good Laboratory Practices
GMP	-	Good Manufacturing Practices
HSA	-	Health Sciences Authority, Singapore
ICH	-	International Conference on Harmonization
IVDs	-	In-vitro diagnostics
LTR	-	Local Technical Representative
MCAZ	-	Medicines Control Authority of Zimbabwe
NCA	-	National Competent Authority
NRA	-	National Regulatory Authority
PQR	-	Product Quality Review
SADC	-	Southern African Development Community
SMF	-	Site Master File
SRA	-	Stringent Regulatory Authority
TGA	-	Therapeutics Goods Administration, Australia
TMDA	-	Tanzania Medicines and Medical Devices Authority
USFDA	-	United States Food and Drugs Administration
WHO	-	World Health Organization
WHO-PQ	-	WHO- Prequalification
WLA	-	WHO Listed Authorities

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Akida M. Khea
Acting Director, Medical Products Control

Foreword

Tanzania Medicines and Medical Devices Authority (TMDA) was established under the Tanzania Medicines and Medical Devices Act, Cap 219 with a mission to protect and promote public health by ensuring the quality, safety and efficacy of medicines and medical devices including diagnostics. One of the pillars to achieve this mission is to conduct Good Manufacturing Practices (GMP) inspection of overseas pharmaceutical manufacturing facilities intending to make available their finished pharmaceutical products in the Tanzania market.

GMP inspection is conducted as part of evaluation process for marketing authorization of medicinal products. Over years, National Medicines Regulatory Authorities verified compliance with GMP standards of pharmaceutical manufacturing facilities by conducting the onsite GMP inspection. Currently, TMDA may take up to 12 months before inspecting/auditing a facility after receiving an application. Among reasons for longer timeframe to conduct GMP inspection include overwhelming number of application for sites to be inspected annually and presence of other competing priorities within the Authority.

The above challenges have affected timely issuance of services delivery, contributed to customer complaints and ultimately led to inadequate access of some essential medicines. In view of this, TMDA has developed these guidelines so that applicants who wish the GMP compliances of their finished pharmaceutical manufacturing facilities be gauged or established based on desk assessment of submitted documentary evidences can follow them.

The desk assessment approach as promoted by the WHO is intended to reduce duplication of GMP inspection efforts made through WHO Prequalification Program, WHO Listed Authorities or SRA and Regional Harmonization Initiatives recognized and approved by TMDA. The same is expected to reduce frequency or duration of inspections while relying on authentic and reliable submitted documentary evidences. It should however be noted that, this approach does not preclude an on-site GMP inspection if the outcome of the assessment does not confirm compliance with the applicable GMP requirements.


Moreover, following the Corona virus Disease 2019" (COVID-19) pandemic caused by a novel corona virus SARS-CoV-2; movement of people worldwide has been restricted as a means to contain spread of the deadly virus. The restrictions have put on halt TMDA roles and responsibilities to conduct overseas on-site GMP inspections and Quality audit which has resulted to untimely registration of medical products and ultimately affect availability of medicines and medical devices to the general public.

While, overseas on-site GMP and Quality audit have been suspended indefinitely subject to uplifting of travel restrictions in many countries; TMDA continues to receive new and renewal applications from facilities requesting to be considered for approval that would enable registration of their products. However, section 51 (c) of the Tanzania Medicines and Medical Devices Act, Cap 219 has set a precondition for registration of medicines and medical devices that they have to be sourced from manufacturing facilities which their operations comply with applicable standards.

Therefore, based on the current COVID -19 pandemic, future unforeseen emergencies, and importance of ensuring continued supply and availability of medicines and medical devices to the general public; TMDA has prepared this guidance to provide temporary waiver for overseas on-site GMP inspection and Quality audit based on the risk of products (type of products), importance of the product(s) in public health, market complaints and audit history by other regulatory authorities.

This first edition Guidelines is expected to address the highlighted challenges while making use of limited resources to improve efficiency of the Authority without jeopardizing the quality, safety and efficacy of registered medicinal products. The procedures on how to apply for desk assessment, the criteria for facilities to be considered for desk assessment, applicable fees and documentary evidence required during submission of an application for desk assessment have been explained in detail in these guidelines. Moreover it is expected to provide answers to frequently asked questions about TMDA position in relation to COVID 19 at the moment and the implementation of the guidelines will ensure business continuity that is vital to safeguarding the supply chain for medicines and medical devices including IVDs during emergency state.

Determination of compliance of the manufacturing facility will depend on the quality of the submitted documents as per requirement set in these guidelines and thus all applicants are urged to adhere to these guidelines in order to avoid unnecessary delays in the desk assessment process and hence expedite provision of quality services to clients. In addition to that the guidance provide temporary waiver for overseas on-site GMP inspection and Quality audit based on the risk of products (type of products), importance of the product(s) in public health, market complaints and audit history by other regulatory authorities. It is anticipated that, adherence to these guidelines will facilitate approval of GMP minimum standards for applied facilities. Any comments or inputs that will improve this document are highly welcomed by TMDA.



Adam M. Fimbo
Director General

Definition of terms

The definitions given below apply to the terms used in this guide. They may have different meanings in other contexts.

Act:

Means the Tanzania Medicines and Medical Devices Act, Cap 219;

Authority:

Means the Tanzania Medicines and Medical Devices Authority, or the acronym "TMDA" established under section 4(1) of the Act;

Agent or local technical representative:

Means a person residing in the country authorized by the applicant or manufacturer to deal in medical products to be an agent (local technical representative);

Applicant:

Means an applicant is a person who applies for marketing authorization of a medical product to TMDA, who must be the owner of the product;

Competent regulatory authority:

Means any organization that has a legal authority or power to perform a designated regulatory function for authorization of a medical product;

Desk assessment:

Means an evaluation of prior documentary evidence by a competent regulatory authority recognized by the national regulatory authority for compliance to the required good practices (good manufacturing practices) in support of marketing authorization;

Emergency Situation or state

Means unexpected factors including pandemics that make it impossible for the Authority to conduct on-site inspections either in a particular country or all countries. Late planning for inspection or limited resources shall not be considered as emergency situation.

Good Manufacturing Practice

Means the part of quality assurance which ensures that products are consistently produced and controlled to the quality standards appropriate for the intended use and as required by the marketing authorization. GMP standards are directly primarily to diminishing the list inherent in any pharmaceutical production that cannot be prevented completely through the testing of the final product;

In-vitro Diagnostics

Means a device, whether used alone or in combination, intended by the manufacturer for the in vitro examination of specimens derived from the human body solely or principally to provide information for diagnostic, monitoring or compatibility purposes. This includes reagents, calibrators, control materials, specimen receptacles, software, and related instruments or apparatus or other articles.

Manufacture:

Means all operations of purchase of materials and products, production, quality control, release, storage, distribution of medicinal products and the related controls;

Manufacturer:

Means a company that carries out operations such as production, packaging, repackaging, labeling and re-labeling of pharmaceuticals;

Marketing authorization:

Means a legal document issued by the competent regulatory authority that establishes the detailed composition and formulation of the product and the pharmacopoeia or other recognized specifications of its ingredients and of the final product itself and includes details of packaging, labeling and shelf life;

Medical Devices or Devices

Means, an instrument, apparatus, implement, medical equipment, machine, contrivance, implant, in vitro reagent, or other similar or related article, including any component, part or accessory, which is –

- (a) recognized in the Official National Formulary, or Pharmacopoeia or any supplement to them;
- (b) intended for use in the diagnosis of disease or other conditions, or in the cure, mitigation, treatment or prevention of disease, in man or other animals or;
- (c) intended to affect the structure or any function of the body of man or other animals, and which does not achieve any of its principal intended purposes through chemical action within the body of man or other animals and which is not dependent upon being metabolized for the achievement of any of its principle intended purposes;

Medical products

Means medicines and medical devices

Notified Body

Means an organization that has been designated by European member states to assess the conformity of products before being placed on the European Union (EU) market with the applicable essential technical requirements which are published in EU Directives or Regulations

Orphan Medicines

Means a medicine designated as such under the terms and conditions set out under Regulation 9 of the Tanzania Medicines and Medical Devices (Orphan Medicines) regulations, 2018.

Pharmaceutical product:

Means any material or product intended for human or veterinary use presented in its finished dosage form or as a starting material for use in such a dosage form that is subject to control by pharmaceutical legislation in the exporting state and/or the importing state;

Quality Audit

Means inspection of medical devices and in-vitro diagnostics manufacturing facilities for the purpose of establishing compliance to ISO 13485:2016

Regional Harmonization initiative:

Means programs aimed at complementing regulatory activities within the regions i.e. EAC and SADC for the purpose of making efficient use of resources. Under these arrangements, inspections are conducted jointly and the outcomes are recognized by the member states; and

Site master file

Means a document containing specific information about the activities undertaken in the pharmaceutical manufacturing site and is usually prepared by the manufacturer.

PART I: CONSIDERATION FOR GMP AND QUALITY AUDIT DESK ASSESSMENT

1.0 Introduction

Over the years, TMDA has seen an exponential growth in the volume of pharmaceutical business coupled with a rise in the number of GMP inspection applications which has resulted into delay in processing them. An increase in the number of applications has been a challenge to many regulators due to limited resources.

GMP compliance reliance based on Desk assessment of GMP applications is being considered by the NMRAs as an alternative option to make optimal use of inspection resources by conducting off-site assessment of documents thereby reducing duplication and frequency of inspection while relying and accepting approvals of other regulatory authorities or organizations. It also reduces the inspection resources needed by the manufacturing site(s) hence result in increased availability and affordability of medicinal products to the public.

Desk assessment process involves submission of current, accurate and authentic documentary evidence by applicant/manufacturer to the Authority to demonstrate the conformity of all processes involved in manufacturing of pharmaceutical products. The evidence provided is assessed to determine the level of GMP compliance based on the accepted standards and the scope of application.

These guidelines focus on overseas manufacturers who intend to obtain marketing authorization in Tanzania who shall submit documentary evidences for assessing GMP conformity in lieu of on-site inspection. The Guidelines is developed based on section 6 of the Tanzania Medicines and Medical Devices (Good Manufacturing Practices Enforcement) Regulations, 2018.

The guidelines are divided into six (6) major sections. The sections delineate the principles and general requirements for desk assessment, application procedure for desk assessment, processing applications, documentary evidence requirements, triggers and factors leading to conduct onsite inspection and publication of GMP desk assessment reports on TMDA website.

Applicants are advised to refer to these guidelines together with the Regulations, 2018 (GN. 295) and the EAC GMP guidelines while preparing their desk assessment applications.

It is therefore expected that the use of these guidelines will enhance effective implementation of the Tanzania Medicines and Medical Devices (Good Manufacturing Practices Enforcement) Regulations, 2018 thereby improving the availability of quality, safe and efficacious medical products for patients in the country. The requirements set forth in these guidelines should be considered as minimum and they are not meant to replace other legal controls, but rather compliment them.

2.0 Criteria for desk assessment

Pharmaceutical manufacturing facilities to be considered for desk assessment shall meet any or all of the following criteria: -

- 2.1 Located in countries with Stringent Regulatory Authority (SRA) or inspected and approved by WHO Listed Authorities (WLA) as follows;
 - a) Founding regulatory members of the International Conference on Harmonization (ICH) namely European Commission (EC)/European Medicines Agency (EMA), Japan and United States of America;

b) Standing regulatory members namely Health Canada and Swiss Medics (or as may be updated from time to time and approved by TMDA); and

c) Regulatory members namely Health Science Authority (HSA) Singapore, the Therapeutics Goods Administration (TGA) Australia and *Agencia Nacional De Vigilancia Sanitaria* (ANVISA) Brazil.

2.2 Inspected and approved by World Health Organization (WHO) under Medicines Prequalification Program.

2.3 Inspected and approved by Regional Harmonization Initiatives namely East African Community (EAC) and Southern African Development Community (SADC).

3.0 Application Procedures for Desk Assessment

Principle:

The desk assessment process involves submission to the Authority of documentary evidence by the applicant, usually a manufacturer or Local Technical Representative (LTR) in order to demonstrate the conformity of the FPP manufacturing site to GMP standards. The evidence provided is assessed to determine the level of compliance based on the accepted standard and the scope of the application. The outcome of the assessment process is used to make a regulatory decision that serves as a prerequisite in determining the marketing authorization of a medical product.

General:

3.1 Before desk assessment process is initiated for a particular manufacturing site, application for market authorization of finished pharmaceutical medicinal products must be lodged by an applicant to the Authority.

3.2 Application for GMP desk assessment shall be made to the Authority by submitting the following:-

3.2.1 A duly filled in GMP desk assessment application form whose template is attached as Annex I to these guidelines submitted online or soft copy in *pdf* format using CD-ROM;

3.2.2 A non-refundable GMP inspection fee as prescribed in the Fees and Charges Regulations in force.

3.2.3 Documentary evidence(s) and information as requested and attached as Annex II to these guidelines; and

3.2.4 Latest electronic *pdf* version of the Site Master File (SMF) not older than a year in a format whose template is attached as Annex III to these guidelines.

3.3 The Authority may request any other additional documentation for clarification during assessment.

- 3.4 The applicant shall ensure that documentary evidence(s) provided, upon which the basis is for granting a GMP approval, be current, accurate and authentic. Any document submitted must adhere to the following general requirements:
- 3.4.1 All certificates and other supporting documents should be in either English or in Swahili language;
 - 3.4.2 Where the document is not in English or a Swahili language, it should be submitted with a certified translation;
 - 3.4.3 Translated documents must be accompanied by a signed and dated statement, by the certified translator, stating that it is a true and accurate translation of the original document;
 - 3.4.4 documents must be the most recent, valid, with effective version, reflect current activities and practices and dated; and
 - 3.4.5 documents must provide sufficient information to cover the scope of activities for which GMP compliance is sought.
- 3.5 The Authority may request certified copies of original documents at any time. Certified copies must be legible and authenticated as true copies.
- 3.6 The information in an application shall be deemed as confidential and not shared with any other party outside TMDA.

4.0 Processing of applications for desk assessment

Principle:

The principles of quality risk management shall be employed to perform desk assessment considering the management of resources in terms of time, funding and personnel. The aim of the assessment process shall be to provide quality product in a timely manner without putting the public at risk.

Based on the fact that other competent and trusted National Regulatory Authorities (NRAs) and organizations have inspected the site of manufacture and in some cases several products manufactured on site, the assessment shall take into consideration and focus on the critical products and critical processes in the manufacture of a specified product in relation to public health risk.

General:

- 4.1 Once an application has been received and GMP fees paid, the Authority shall process the application as per time frame set out in the TMDA Clients Service Charter (CSC).
- 4.2 In case of missing information or issues that require clarification by the applicant, this shall be documented in the desk assessment report and issued to the applicant via query letter. If no responses or appropriate responses are received within 30 calendar days an onsite inspection shall be scheduled.
- 4.3 In case of outright rejection of submitted documentary evidence, TMDA shall inform the applicant and plan for on-site inspection.

- 4.4 If the evidence provided demonstrates the GMP compliance of a facility, the Authority shall issue desk assessment GMP certificate in a format whose template is attached as Annex IV to these guidelines and update application status in the database to 'compliant'.
- 4.5 The validity of the desk assessment GMP Certificate shall be three years from the date of issuance.
- 4.6 The Authority may revoke/suspend the issued desk assessment GMP certificate upon being satisfied that the facility is no longer considered to be in compliance with GMP requirements and TMDA shall plan for on-site inspection.

5.0 Documentary evidences requirements

- 5.1 The documents required for desk assessment of each type of facility are mentioned in the table 1 below,

Table 1: Type(s) of facility and evidence documents required for desk assessment

Type of facility	Where inspected by EAC or SADC joint harmonization initiatives	Where inspected by SRA or WHO Prequalification Scheme
Non-sterile products facilities	Evidence List A and current joint EAC or SADC GMP inspection report	Evidence List A and B
Sterile products, biological and immunological facilities	Evidence List A, current joint EAC or SADC GMP inspection report and certification to relevant ISO Standards for sterilization facility (if applicable to the manufacturing facility or activity)	Evidence Lists B, C and D
Outsourced (contract) testing laboratory; and outsourced sterilization	Evidence List A, current joint EAC or SADC GMP inspection report and certification to relevant ISO Standards for sterilization facility (if applicable to the manufacturing facility or activity)	Evidence List D

- 5.2 A list of the documents that shall be used for desk assessment is given in Annex II and categorized as evidence lists A, B, C and D.
- ## 6.0 Triggers and factors leading to conducting onsite inspection
- 6.1 If it is known that the facility or site has not been inspected and approved by the SRA, WLA, WHO-PQ or regional harmonization initiatives (EAC or SADC).
- 6.2 The site or facility or production line was not relevant to the specific SRA, WLA or WHO-PQ product.
- 6.3 Failure to submit documentary evidences or any requested information during desk assessment
- 6.4 Facilities that have been subjected into successful desk review for two consecutive times.

6.5 Any other risk factors that may be identified by the Authority.

7.0 Publication of GMP desk assessment reports

Publication of summarized desk assessment reports for facilities found to be GMP compliant shall be done in the TMDA website: www.tmda.go.tz

PART II: CONSIDERATION FOR GMP AND QUALITY AUDIT TEMPORARY WAIVER

1.0 Introduction

On-site Quality Audit or GMP inspection is regarded as the best way for determining compliance of manufacturing facilities to applicable standards. However, in circumstances of emergency such as COVID-19 pandemic, where many countries imposed travel restrictions as a measure to contain further spread of the virus, the on-site GMP inspection and Quality audit is not feasible. Such situations hinder the Authority to conduct overseas on-site inspections as a requirement under section 51 (c) of the Tanzania Medicines and Medical Devices Act, Cap 219.

Desk assessment could be the preferred alternative for establishing compliance of manufacturing facilities to applicable standards in lieu of on-site Audits. However, according to criteria, not all medicines or medical devices manufacturing sites are eligible. Hence, the need for the Authority to develop guidelines to cater for emergency states as an interim measure to allow processing of GMP and Quality Audit applications and ultimately ensure availability of quality, safe and efficacious medicines and medical devices to the public.

These guidelines consist of six (6) including the introduction which is the first part, the second part is the purpose, the scope has been detailed under the third part of the guidelines, while the criteria for temporary waiver of on-site GMP inspection and Quality Audit are described in part four. These criteria include type of product and importance of the products in public health, inspection history by other NMRAs, market complaints records and acceptance of data in the product dossier. Furthermore, application procedures and requirements to communicate with applicants are delineated in parts five and six of the guidelines respectively.

These guidelines are intended for overseas manufacturers who have applied for GMP inspection and Quality Audit in Tanzania but do not meet the criteria for desk review and shall form the short term basis for decision making in the course of emergency states.

The requirements set forth in these guidelines should be considered as minimum and they are not meant to replace other legal controls, but rather compliment them.

2.0 Purpose

These Guidelines have been prepared for the purpose of facilitating granting of temporary waiver for overseas on-site GMP inspection and Quality Audit in emergency situation as observed during the COVID-19 pandemic. The temporary waiver shall last for a period not exceeding one year and may be extended or terminated as decided by the Authority.

3.0 Scope

The guidelines are applicable for facilities that have submitted new and renewal applications for GMP inspection or Quality Audit but do not meet criteria for desk review.

4.0 Criteria for temporary waiver of on-site GMP inspection and quality audit

During emergencies, decision on temporary waiver to conduct on-site GMP inspection and Quality Audit for new and renewal applications shall base in the following:-

4.1 New GMP and Quality Audit applications

Criteria for new applications shall depend on the type of product, importance of the product(s) in public health, inspection history by other NMRAs and acceptance of data in the product dossier.

4.1.1 Type of products

a) Medical Devices and IVDs

On-site Quality Audit of manufacturing facilities for Class B medical devices and IVDs which are of low risk may be temporarily waived for a period not exceeding one.

b) Medicines

On-site GMP inspection of low risk pharmaceutical dosage forms such as those administered orally or topically may be temporarily waived for a period that does not exceed one year.

4.1.2 Products of public health importance

a) Medical Devices

On-site Quality audit of some manufacturing facilities for Class C and D medical devices may be temporarily waived for a period that does not exceed one year for public interest during emergency.

b) Medicines

On-site GMP inspection of facilities that manufacture medicines of public health importance such as anti-retroviral (ARVs), vaccines, anti-tuberculosis (Anti-TBs), Anti-malaria's, anti-cancer, some antibiotics and orphan medicines may be temporarily waived for a period that does not exceed one year for public interest during emergency.

4.1.3 On-site audit history by other regulatory authorities

Before any decision for temporary waiver of on-site Quality audit and GMP inspection is made, history of valid on-site GMP inspection and Quality audit approval by other NMRAs and Notified Bodies shall be sought.

4.1.4 Acceptance of information in the product dossier

Notwithstanding the above criteria, facilities which will be considered for temporary waiver of on-site GMP inspection and Quality audit shall have in advance submitted application dossiers and their information assessed and accepted.

4.2 Renewal Applications

Decision for temporary waiver of on-site GMP inspection and Quality audit for renewal applications shall depend on inspection history of the manufacturing facilities and market complaints records.

4.2.1 On-site Audit History by the Authority

Facilities which complied and are due for renewal within one year shall qualify for a temporary waiver of on-site GMP inspection and Quality audit for a period not exceeding one year.

4.2.2 Market Complaints

Facilities for which TMDA has recorded Class I complaints from the market with regards to quality, safety and effectiveness of products, shall be not be considered for temporary waiver of on-site GMP inspection and Quality audit. Whereas, facilities recorded with Class II and III complaints shall be considered for temporary waiver of on-site GMP Inspection and Quality audit for a period not exceeding one year.

5.0 APPLICATION PROCEDURES

There shall be no applications for temporary waiver of on-site GMP inspection and Quality audit during state of emergency, instead already submitted applications shall be used to make informed decisions.

6.0 COMMUNICATION

The Authority shall officially communicate with an applicant who has been granted a temporary waiver of on-site GMP inspection and Quality audit.

PART III: CONSIDERATION FOR GMP AND QUALITY AUDIT VIRTUAL INSPECTION

1.0 Introduction

Virtual inspection means inspections that are performed off-site through the use of enhanced communication and information technology to fulfill a legal requirement of an on-site inspection. The only difference from on-site inspection is that the inspector is not physically present at the inspection site.

Experience that was gained from challenges encountered during the COVID-19 pandemic where onsite GMP inspections could not be performed due to travel restrictions, made it necessary for the authority to adopt measures that could help to prevent disruption of medical products supply during such emergencies. Such measures include desk review, one year period waiver of onsite GMP inspection and virtual inspection.

Desk review and temporary waiver of onsite GMP inspection have been described clearly in Part I and II of these Guidelines. Therefore this part describes briefly but clearly the criteria, application procedures and communication with regard to virtual inspection.

2.0 Criteria for Virtual Inspection

New applications for GMP Inspection and Quality Audit for manufacturing facilities that manufacture high risk medical devices (Class C and D) and high risk medicines such as parenteral formulations shall qualify for virtual inspection during emergencies. After inspection, if their compliance is confirmed, these facilities shall be issued with GMP or QMS compliance certificates with a validity period of one year.

3.0 Application procedures


There shall not be applications for virtual inspection, instead already submitted applications shall be considered by the Authority.

4.0 Communication

Applicants will be informed in writings by the authority about the plan to conduct virtual inspection.

Annexes

Annex I: GMP Desk Assessment Application Form

 TMDA <small>Tanzania Medicines & Medical Devices Authority</small>	GMP DESK ASSESSMENT APPLICATION FORM	TMDA/DMC/MCIE/R/014 Rev #:02
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Please read this section carefully before completing the form

1. Please check the corresponding box in the "Encl." column if any document is enclosed and indicate the respective indexes in the submission folder
2. Please check the boxes as appropriate

A. PARTICULARS OF THE APPLICANT AND MANUFACTURING SITE

Note	Particulars of Applicant		
A.1	Applicant's name		
	Physical address of Head Office		
	Post Code:	Country:	
	Contact Person:	Telephone and mobile number:	
	Fax:	E-mail:	
	Website:		
Note	Particulars of the Manufacturing Site(s)		
A.2	Name		
	Unit		
	Block		
	Physical address of the site		
	Post Code:	Province/State:	
	Country:	Contact Person:	
	Telephone and Mobile Number:	Fax:	

	E-mail:	Website:	
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B: AUTHORIZED REPRESENTATIVE/AGENT IN THE COUNTRY

	Name of Local Technical Representative (LTR)		
	Physical address:		
	Post Code:	Country:	
	Contact Person:	Telephone and Mobile Number:	
	E-mail:	Fax:	

C: PRODUCTION LINES TO BE ASSESSED

DOSAGE FORM	Tick where applicable	*CATEGORY	**ACTIVITIES
Tablets			
Capsules			
Injections (SVP)			
Injections (LVP)			
Oral liquids			
Creams/Ointments/lotions			
Others (specify)			

*Category means any of the following:

Beta lactam, Non-beta lactam, Biologicals, Vaccines, Hormones, Cytotoxic products.

**Activity means any of the following:

- Formulation (dispensing, mixing, blending)
- Processing (compression, emulsification etc)
- Packing
- Quality Control
- Warehousing (raw material, finished products)

D: DOCUMENTARY EVIDENCES REQUIRED

D.1	Evidence List A	Encl
	i. Current GMP Certificate (must be with at least 1 year remaining validity)	<input type="checkbox"/>
D. 2	Evidence List B	Encl
	i. Current GMP Certificate (must be with at least 1 year remaining validity)	<input type="checkbox"/>
	ii. Current manufacturing license	<input type="checkbox"/>
	iii. List and GMP status of regulatory inspections conducted within the past three years	<input type="checkbox"/>
	iv. Copy of the most recent (not older than 2 years) inspection reports issued by Authorities (i.e. EAC, SADC, SRA and WHO-PQ Program)	<input type="checkbox"/>
	v. Market complaints register (for previous three years) including one investigation report of one of the complaints classified as high risk to public health	<input type="checkbox"/>
	vi. Details of any regulatory action undertaken by the regulatory agencies in the past three years (e.g. products alert, warning letters , import alerts, recalls)	<input type="checkbox"/>
	vii. Latest electronic pdf version in CD-ROM of the Site Master File not older than one year	<input type="checkbox"/>
	viii. List of products intended for supply in Tanzania including;	<input type="checkbox"/>
	a. PQR report for each product	<input type="checkbox"/>
	b. Process validation report	<input type="checkbox"/>
	c. Batch manufacturing records for products manufactured in the last 6 to 12 months	<input type="checkbox"/>
	ix. Long and short-term stability studies raw data at Zone IVB for batches applied for marketing registration	<input type="checkbox"/>
D3	Evidence List C (Additional documents for sterile products)	Encl
	i. Validation Master Plan	<input type="checkbox"/>
	ii. Aseptic processing and filling validation reports this is for terminal sterilization process	<input type="checkbox"/>
D4	Evidence List D	Encl
	i. Current Certificates (GMP, ISO/IEC 17025 Certification certificate or WHO-PQ)	<input type="checkbox"/>
	ii. Quality manual /laboratory manual or equivalent	<input type="checkbox"/>
	iii. Contract or agreement between the facility and outsourced testing or sterilization institution	<input type="checkbox"/>

	iv. A list of test a laboratory is authorized	<input type="checkbox"/>
	v. For botanical ingredients, enclose evidence to authenticate standards reference that are used	<input type="checkbox"/>

E. DECLARATION BY APPLICANT

I, the undersigned certify that all the information in this form and accompanying documentation is current, accurate and authentic to the best of my knowledge.

Name: _____


Position: _____

Signature: _____

Official stamp:

Date: _____

Annex II: List and description of documentary evidence


	LIST AND DESCRIPTION OF DOCUMENTARY EVIDENCE	TMDA/DMC/MCIE/R/014 Rev #:02
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	Required evidence	Comments and Exceptions
Evidence List A	Current GMP certificate.	Certificates must be with at least one-year remaining validity to cover the scope of the GMP compliance application
Evidence List B	Current GMP certificate	Certificates must be with at least one-year remaining validity to cover the scope of the GMP compliance application
	Current manufacturing license	The manufacturing license shall be valid and show the scope of products and activities approved by the local NRA
	Regulatory inspections conducted within the past three years and a copy of the most recent inspection report issued by SRA, WHO-PQ and Regional Harmonization Initiatives	<p>Provide a list and GMP status of all inspections conducted applicable to the scope of the application.</p> <p>A copy of the most recent inspection report conducted within the last two (2) years must be sent to TMDA directly from the manufacturer</p> <p>Corrective action and preventive action (CAPA) evaluation report for the recent inspection report shall be provided</p>
	Market complaints register	<p>For previous three years, including an investigation report for one of the complaints classified as high risk to public health</p> <p>The complaint register shall be applicable to the products applied for</p>
	Details of any regulatory actions in past three (3) years	For example, product alerts, warning letters, import alerts, recalls due to defects
	Site Master File	Site Master File (refer to part

	Required evidence	Comments and Exceptions
		<p>three of the compendium of GMP technical documents for harmonization of medicines regulation in the East African Community in force) whose template is attached as Annex III to these guidelines for writing Site Master File</p> <p>Site Master File shall not be older than one (1) year</p> <p>Site Master File shall not be required if the scope of the application is only for the step of release for supply</p>
	List of products intended for supply in the country	
	a) PQR report; b) Process validation report; and c) Batch records (batch manufacturing, packaging and testing) for each product applied for marketing authorization	<p>The PQR reports shall be provided for each product. In case of multiple products provide one PQR report from each FPP dosage form applied for registration</p> <p>The batch records of a product for each FPP dosage form manufactured in the last 6 to 12 months; and the corresponding process validation reports and annual product quality review reports</p>
	Real time and Accelerated stability studies conducted under Zone IVB conditions	Data should be for the products applied for marketing authorization
Evidence List C	Validation Master Plan	<p>Validation Master Plan shall be valid at the time of submission of application (refer to Annex 3 of the compendium of GMP technical documents for harmonization of medicines regulation in the East African Community in force)</p> <p>Not required if the scope of the application is only for the step of</p>

	Required evidence	Comments and Exceptions
		release for supply
	Aseptic processing and filling validation reports	Required for products applied that are not terminally sterilized
Evidence List D	Current GMP certificate or ISO/IEC accreditation certificate or WHO prequalification	For outsourced testing laboratories, a GLP certificate issued by a recognized regulatory authority or a current ISO/IEC 17025 accreditation certificate or prequalification of the laboratory by WHO For outsourced sterilization facilities certification to applicable ISO sterilization standards (e.g. ISO 11137, ISO 11135)
	Quality manual/laboratory manual or equivalent	The quality manual/laboratory manual shall be written as per the WHO good practices for pharmaceutical quality control laboratories, or as per the ISO/IEC 17025 General requirements for the competence of testing and calibration laboratories
	Contract or agreement between the FPP manufacturer and the outsourced testing laboratory or sterilization institution	A copy of the contract or agreement clearly describing the roles and responsibilities of the manufacturer and the testing laboratory or sterilization institution shall be submitted
	A list of tests a laboratory is authorized to perform as per the scope of its accreditation to the ISO/IEC 17025 or WHO prequalification For botanical ingredients, evidence that authenticated standard reference materials are use	The scope of activities of the outsourced laboratory shall include the type, range and volume of testing and/or calibration, validation and verification activities it undertakes

Annex III: Model format of Site Master File (SMF) for FPP manufacturing facility

	MODEL FORMAT OF SITE MASTER FILE (SMF) FOR FPP MANUFACTURING FACILITY	TMDA/DMC/MCIE/R/014 Rev #:02
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1. COVER PAGE WITH NAME AND COMPLETE ADDRESS OF THE SITE
2. TABLE OF CONTENTS
3. GENERAL INFORMATION
 - a. Contact information on the manufacturer
 - b. Scope of production and authorized pharmaceutical manufacturing activities of the site
 - c. Any other manufacturing activities carried out on the site.
4. QUALITY MANAGEMENT
 - a. Brief descriptions of the quality management system and quality risk management run by the company and reference to the Standards used.
 - b. Responsibilities related to the maintaining of the quality system including senior management
 - c. Information on activities for which the site is accredited and certified, including dates and contents of accreditations, and names of accrediting bodies.
 - d. Release procedure of finished products
5. MANAGEMENT OF SUPPLIERS AND CONTRACTORS
6. PRODUCT QUALITY REVIEWS
 - a. Brief description of methodologies used.
7. PERSONNEL
 - a. Organization chart, qualifications, experience and responsibilities of technical personnel
 - b. Outline of arrangements for basic and in-service training and how records are maintained.
 - c. Personnel hygiene requirements, including clothing.

8. PREMISES AND EQUIPMENT

- a. Layout of manufacturing facilities including three dimensional drawings of the premises, air handling systems and water purification systems
- b. Nature of construction and finishes
- c. Brief description of planned preventive maintenance programmes for premises and of the recording system.
- d. Brief description of other relevant utilities, such as steam, compressed air, nitrogen.
- e. Availability of written specifications and procedures for cleaning manufacturing areas
- f. List of production and quality control equipment
- g. Brief description of the procedures used for cleaning major equipment.
- h. Brief description of planned preventive maintenance programmes for equipment and of the recording system.
- i. Brief description of the company's Qualification and calibration policy, including the recording system. Reference should be made to the Validation master plan.

9. DOCUMENTATION

- a. Arrangements for the preparation, revision, distribution and archiving of necessary documentation for manufacture should be stated.
- b. Brief description of the validation master plan
- c. Brief description of the change control and deviation procedures
- d. Any other documentation related to product quality that is not mentioned such as (microbiological controls on air and water).

10. PRODUCTION

- a. Type of products
- b. Process validation
- c. Material management and warehousing
- d. Arrangements for the handling of rejected materials and products.

11. QUALITY CONTROL

12. DISTRIBUTION, COMPLAINTS, PRODUCTS DEFECT AND RECALL

13. SELF-INSPECTION

14. SHELF LIFE / STABILITY DETERMINATION PROGRAM

- a. General policy for the determination of the shelf-life and stability of products manufactured at the site.

15. REFERENCES

16. REVISION HISTORY

Annex IV: Model format of Certificate of Desk Assessment for Good Manufacturing Practices (GMP) Compliance

TANZANIA MEDICINES AND MEDICAL DEVICES AUTHORITY



**CERTIFICATE OF COMPLIANCE TO GOOD MANUFACTURING PRACTICES (GMP)
THROUGH DESK ASSESSMENT**

Made under regulation 6 of the Tanzania Medicines and Medical Devices (Good Manufacturing Practice Enforcement) Regulations, 2018

GMP Certificate No......

On the basis of the desk assessment carried out on I certify that located at has been found to comply with Good Manufacturing Practices requirements for dosage forms and categories of medicines listed below:

S/ N	Dosage Forms	Categories of Medicines	Manufacturing Operations

The responsibility for the quality of the individual batches of the pharmaceutical products manufactured lies with the manufacturer and /or marketing authorization holder.

This certificate shall remain valid until It becomes invalid if the dosage forms, operations and /or categories certified herewith are changed or if the site is no longer considered to be in compliance with current GMP.

Date

DIRECTOR GENERAL

Note:

1. This Certificate certifies the status of the site described above
2. This Certificate shall remain valid for a period of 3 years from the date of issue.

Bibliography

1. EAC, (2014)., *Compendium of Good Manufacturing Practices (GMP) Technical Documents for Harmonization of Medicines Regulation in the East African Community*, September 2014, East African Community, Arusha, Tanzania.
2. WHO, (2018)., *Guidance on Good Practices for Desk Assessment of Compliance with Good Manufacturing Practices, Good Laboratory Practices and Good Chemical Practices for Medicinal Products*, TRS 961, Annex 9, World Health Organization, Geneva, Switzerland.
3. PIC/S, (2018)., *Guidance GMP Compliance Reliance*, PI048-1, Pharmaceutical inspection Cooperation Scheme, Geneva, Switzerland.
4. HSA, (2018)., *Regulatory Guidance, GMP Conformity Assessment of an overseas manufacturer*, December, 2018, Health Sciences Authority, Singapore,
5. TMDA, (2003)., *Tanzania Medicines and Medical Devices Act, Cap 219*. Tanzania Medicines and Medical Devices Authority. Government Printer, Dar es Salaam, Tanzania.
6. TMDA, (2018)., *Tanzania Medicines and Medical Devices (Good Manufacturing Practices Enforcement) Regulations GN No. 295*. Tanzania Medicines and Medical Devices Authority. Government Printer, Dar es Salaam, Tanzania.
7. TMDA, (2015)., *Guidelines on submission of documentation for Registration of Human Pharmaceutical Products*, 1st Ed, Tanzania Medicines and Medical Devices Authority, Dar es Salaam, Tanzania
8. USFDA, (2020)., *Manufacturing, Supply Chain, and Drug and Biological Products Inspections During COVID-19 Public Health Emergency Questions and Answers, Guidance for Industry*.
9. TGA, (2020)., *GMP Approach to Overseas Manufacturers of Medicines and Biologicals During the COVID-19 Pandemic* <available on <https://www.tga.gov.au/nod/906141>> dated 25th September, 2020.
10. Swissmedic, (2020)., *Updates on Inspections in Switzerland During the COVID-19 Pandemic*< available on <https://www.swissmedic.ch/news/coronavirus-covid-19>> dated 25th September, 2020.
11. EU, (2020)., *A Guide to Quality and Regulatory Compliance During COVID -19*
12. EU, (2020)., *Medical Device Coordination Group Document (MDCG-4) Guidance on Temporary Extraordinary Measures Related to Medical Devices Notified Body Audits During COVID-19 Quarantine Orders and Travel Restrictions*.
13. MCAZ, (2020)., *Guidance on Good Practice (GxP) Inspections During Emergencies/Disasters including the COVID-19 Pandemic*.

14. TMDA, (2003)., *Tanzania Medicines and Medical Devices Act, Cap 219, Tanzania Medicines and Medical Devices Authority, Government Printers, Dar es Salaam, Tanzania.*
15. TMDA, (2020)., *Guidelines on Submission of Documentation for establishment of Compliance to Good manufacturing Practices Through Desk Assessment, Tanzania Medicines and Medical Devices Authority.*
16. IFPMA. *Best Practices for Virtual Inspection-23 July, 2020. www.ifpma.org-content/uploads/2020/07 retrieved on 24th December,2020.*

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