Good Distribution Practice (GDP)
Thai FDA

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Agenda

- Good Distribution Practice (GDP) in Medicinal Products
- Why has GDP become such a hot topic?
- Overview New Thailand GDP Guidelines
- Q&A session

GDP in Medicinal Products

Good Distribution Practice (GDP)

The part of quality assurance which ensures medicinal products are consistently stored, transported and handled under suitable conditions as required by the market authorization (MA) or product specification.

Focusing

Safety and Effectiveness of medicinal products

Why has GDP become such a hot topic?

- Thailand: Notification of the Ministry of Public Health No. 138 (110) – Guide to Good Distribution Practice for Medicinal Products B.E. 2021
- This notification shall become effective on 01Jan2022.

Overview New Thailand GDP Guidelines

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

1 Quality Management

- Setting out responsibilities, risk management principles in relation to their activities.
- Clearly defined in procedures and systematically reviewed.
- All critical steps of distribution processes and significant changes should be justified and where relevant validated.
- Responsibility of the organization's management and requires their leadership and active participant and should be supported by staff commitment.

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

2 Personnel

- There must be sufficient competent personnel to carry out all the tasks is responsible.
- Individual responsibilities should be clearly understood by the staff and be recorded.

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

3 Premises and Equipment

- It must have suitable premises, installations and equipment to ensure proper storage and distribution of medicinal products
- The premises should be clean, dry and maintained within acceptable temperature limits

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

4 Documentation

- Written documentation should prevent errors from spoken communication and permits the tracking of relevant operations during the distribution of medicinal products
- Records should be made at the time each operations is undertaken.

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

5 Operations

- All actions taken should ensure that the identity of the medicinal product is not lost and is performed according to the information on the outer packaging.
- It should use all means available to minimize the risk of falsified medicinal products entering the legal supply chain.
- All medicinal products distributed in the intended market must be appropriate authorized.
- All key operations should be fully described in the quality system in appropriate documentation

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

6 Complaints, Returns, Suspected Falsified Medicinal Products and Product Recalls

- It must be recorded and handled carefully according to the written procedures.
- Records should be made available to the Thai FDA.
- An assessment of returned medicinal products should be performed by designated personnel before any approval for resale.
- A consistent approach by all partners in the supply chain is required in order to be successful in the flight against falsified medicinal products

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

7 Outsources Activities

- Any activities covered by the GDP that is outsourced should be correctly defined, agreed and controlled in order to avoid misunderstanding which could affect the integrity of the product.
- There must be a written contract between the contract giver and the contract acceptor which clearly establishes the duties od each party.

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

8 Self-Inspections

Self-inspections should be conducted in order to monitor implementation and compliance with GDP principles and to propose necessary corrective measures.

Structure of Thai FDA GDP

aligned with PICs GDP (PE 011-1, 1Jun2014)

9 Transportation

- It is responsibility to protect medicinal products against breakage, adulteration, theft.
- To ensure the temperature conditions are maintained within acceptable limits during transportation.
- It should be possible to demonstrate that the medicinal products have not been exposed to conditions that may compromise their quality and integrity.
- A risk-based approach should be utilized when planning transportation.

1. Quality Management System

Quality Management describes the Quality System including management review, continuous improvement, Corrective actions/ preventive actions (CAPA) and Risk management. Deviations must be investigated and CAPA process implemented. Some interesting precisions are given concerning Risk Management.

- Control and review of any outsourced activities should include risk management principles.
- Temperature mapping of e.g. storage areas should be repeated according to the results of a risk assessment
- A risk-based approach should be utilized when planning transportation routes.

Management should have a formal reviewing process including performance indicators to monitor the effectiveness of the quality system.

2. Personnel

New

Personnel now requires the distributor to designate a Responsible Person (RP) with a “desirable” degree in pharmacy.

Their main responsibilities are defined as Quality Management/ Training/ Recall/ Complaints/ Returns/ Falsified Medicines/

Approval Suppliers/ Outsourcing/ Records/ Self- Inspections and so on.

The RP should fulfill his/her Responsibilities personally and should be continuously contactable.

“The RP may delegate duties but not responsibilities”.

The organizational structure of the distributor should be clearly described, and the roles and responsibilities of key persons described in

job descriptions. Initial and continuous training have to be planned and recorded.

3. Premises and Equipment

Premises and Equipment introduces new requirements concerning storage areas. They should be temperature mapped and the mapping should include initial mapping prior to use, seasonal variations and be repeated based on risk assessment.

- Location of temperature monitors should be based on mapping.
- All equipment should be maintained to a suitable standard and preventive maintenance should be registered.
- Equipment (e.g. temperature monitoring devices) should be calibrated at defined intervals based on a risk and reliability assessment.
- Records should be sustained.
- Alarm systems should be in place and tested periodically.

3. Premises and Equipment

New

- Any system replacing physical segregation, such as electronic segregation based on a computerized system, should provide equivalent security and should be validated.
- Products pending a decision as to their disposition or products that have been removed from saleable stock should be segregated either physically or through an equivalent electronic system.

It is also including a Qualification/ Validation subchapter which states that key equipment should be qualified and key processes (such as storage, pick and pack) should be validated, based on a documented risk assessment approach. Observed qualification and validation deviations should be investigated.

5. Operations

New

- Operations specifies that suppliers shall be qualified meaning that they are in possession of a distribution authorization or are in possession of a manufacturing authorization which covers the product in question.

- The distributor should carry out due diligence of new suppliers and periodically recheck that qualification and approval are confirmed.

7. Outsources Activities

- Contract operations is adapted and gives Contract Giver responsibility to assess Contract Acceptor competences through audits.
- Contract Acceptor should have adequate facilities and experience to carry out contracted work safely and efficiently.

9. Transportation

New

- Transportation states that “the required storage conditions for medicinal products should be maintained during transportation within the defined limits as described by the manufacturers or on the outer packaging”.

- There are no official guidelines for transport conditions. This point will require additional efforts from the manufacturers and distributors even for products having demonstrated sufficiently that their quality remained satisfactory after a short period out of storage conditions as for example during transportation.

Q1: Does the manufacturer have to certify GDP, or is that the duty of the distributors?

- Manufacturer shall meet the specifications for product storage as laid down in the GMP.

- If they are responsible for selling the medicinal products, they shall comply with GDP

  such as storing and transporting; maintain protection and safety through the entire supply chain.

Q2: The supply chain (transportation, distribution companies etc.) for finish goods needs to be managed and monitored for any manufacturer of a medicinal product. Is that under responsibility for the Responsible Person (RP) of the medicinal product manufacturer?

- If the manufacturer owns the product in the supply chain, the owner of the product in the supply chain is responsible for the product in the supply chain.

- The duty can certainly be shifted to the different RP, but the overall liability remains with the product RP.

Q3: Do I have to audit all transport organizations and warehouses who are going to manage my products? What about hubs for transport at up-country, for example, Twenties of such facilities may be open?

- The owner of products may inspect and authorize all their outsourced operations and to have an agreement with their services providers in technical/ quality terms.

- Risk evaluation should help the approach to the selection and approval depending on the complexity of operations of the product concerned and its sensitivity.

Q4: Are both medicinal products and veterinary products included by Thai FDA GDP Guide?

- Thai FDA GDP provided from PIC/s Guide to Good Distribution Practice for Medicinal Products (PE 011-1, 1Jun2014 (with amendments)).

- PIC/s Guide is based on the EU Guidelines on Good Distribution Practice (GDP) of Medicinal Products for Human Use (2013C 343/01).

- The EU GDP Guide provides: Guidelines for Good Distribution of Medicinal Products for Human (2013C 343/01). This means veterinary goods are not included, but GDP standards can be accepted voluntarily on the basis of a risk assessment.

Q5: Is transport subject to the GDP Guide and can carriers or related companies be given a GDP certificate?

- Transport companies do not need to take a distribution license to distribute medication.

  They can, however, follow GDP guide.

- It means transportation companies are expected to adhere to GDP but do not require to obtain GDP certificate.

Q6: Does the ISO9001:2015 certification requires for GDP?

- It is not clearly defined in GDP. The ISO specification should also provide the particular GDP specifications of business (if any).

- GDP are built to cover the ISO9001 structure.

- Certification in simply ISO9001 is not enough to comply with the GDP licensing criteria. The Quality System should be structured to ensure the quality of the medicinal products in the supply chain at all levels.

Q7: What are the main criteria for Quality System in GDP Guide?

Some of the main aspects:

- Medicinal products are collected in a manner that meets the GDP criteria, kept, imported or exported;
- The responsibilities for management are clearly defined;
- Products can be delivered within satisfactory time to the right recipients;
- Records are made contemporaneously;

Q7: What are the main criteria for Quality System in GDP Guide?

Some of the main aspects (Cont'd):

- Deviations from established procedures are documented and investigated;

- In order to correct and avoid deviations in accordance with the concepts of quality risk control, appropriate CAPA shall be taken.

- The monitoring and quality risk management of outsourced operations should also be a key component of the quality framework.

Q8: The supply chain provides a range of logistics operations, such transport and storage, to service providers. Can a contract be entered into with the service providers, so they are responsible exclusively for the medicinal product's quality system as well?

- No.
- The organization which chooses to outsource these services to a service provider will continue to be responsible for meeting GDP specifications and the quality of the medical product.
- All services that may be outsourced by the provider are still under the responsibility of the company and its responsible person.
- A quality contract is recommended to specify duties and responsibilities.

Q9: Quality Risk Management applied in compliance with chapter 1.5. What are the requisite documents required?

- A reference for ICH Q9 is contained in chapter 5 which related to a guideline for Quality Risk Management of medicinal products.
- For example

  - **Management of temperature and environments**: Maps should be updated on the basis of the results of risk assessment exercise or when major changes are made to the installation of temperature control equipment.

  - **Equipment** used to track the area in which medicinal products are stored shall be calibrated, based on risk and reliability assessments, at definite intervals.

Q9: Quality Risk Management applied in compliance with chapter 1.5. What are the requisite documents required?

- **Operation**: It should reduce the possibility of entry into the supply chain of counterfeit medicinal products.
- **Returned medicinal products** shall be handled in a written, risk-based manner, taking into account the substance concerned, any relevant storage conditions, and the period since originally dispatched medicinal products.
- **Transportation**: Risk assessments should be used for distribution routes to evaluate the appropriate temperature control.

Q10: Is RP desirable to graduate in pharmacy?

- The selection of RP shall be considered carefully.
- Person should demonstrate a comprehensive understanding of medicinal products and knowledge of GDP.
- Knowledge example storage conditions and requirements, specific awareness of degradation mechanisms and stability profiles, GDP and related guide, temperature control and tracking systems.
- Experience example FIFO, picking & packing procedure, complaint managements, process for supplier approval.

Q11: How do we position equipment for temperature control ?

- It should be based on a mapping exercise that consider the worst cases.
- Ideally, before using the storage area, the first mapping should be conducted. After completion of initial mapping, the data should be analyzed and used to classify the locations for currency monitoring most relevant.
- After the facility is used for storing, a second exercise should be carried out.
- Repetitive exercise should be performed on the basis of risk evaluation results which consider whether the variations are indeed seasonal.

Q12: How will records be written in Thai language? Do paper copies such SOP/ WI for working are permitted?

- The records are accessible to workers, and it shall be in a language understood by workers.

- If electronic access is not possible, it may need to be put in the workplace as paper.

Q13: When we can use Mean Kinetic Temperature (MKT)?

- MKT: “A single derived temperature that, if maintained over a defined period of time, affords the same thermal challenge to a drug substance or drug product as would be experienced over a range of both higher and lower temperatures for an equivalent defined period.”
- Mostly authorities: MKT should not be used to compensate for poor temperature control of storage facilities. It may be applied in situations where control is relatively good, but where occasional excursions may be encountered.
- MKT can only used when it is supported by stability studies.
- MKT cannot be used for biological and vaccine products.

References

- Thailand: Notification of the Ministry of Public Health No. 138 (110) – Guide to Good Distribution Practice for Medicinal Products B.E. 2021
- Guide for assessment – Good Distribution Practice by Thai FDA (1 Oct 2020)
- PICS: Guide to Good Distribution Practice for Medicinal Products (PE 011-1, 1 Jun 2014)
- European Commission: Guidelines on Good Distribution Practice of Medicinal Products for Human Use (2013/C 343/01)
- PDA.org – Proposed revisions to General Chapters <659> and <1079> and Proposed New General Chapter <1079.2>
- A global review of Good Distribution Practices by Cold Chain IQ
- Good Distribution Practices: Questions & Answers about the topic of Good Distribution Practices by Cold Chain Today

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THANK YOU