EURASIAN ECONOMIC COMMISSION
COUNCIL

DECISION

November 03, 2016. **No 83** Astana city

on Adoption of the Rules for Conducting Pharmaceutical Inspections

Pursuant to Article 30 of the Treaty on the Eurasian Economic Union of 29 May 2014, Articles 7 and 10 of the Agreement on the Common Principles and Rules of Medicinal Products Circulation within the Eurasian Economic Union of 23 December 2014, paragraph 96 of Appendix No 1 to the Regulations of the Eurasian Economic Commission as approved by Decision No 98 of the Supreme Eurasian Economic Council of 23 December 2014, and by Decision No. 108 of the Supreme Eurasian Economic Council of 23 December 2014 on the Implementation of the Agreement on the Common Principles and Rules of Medicinal Products Circulation within the Eurasian Economic Union, the Council of the Eurasian Economic Commission has decided:

1. To adopt the attached Rules for Conducting Pharmaceutical Inspections.

2. This Decision shall enter into force on the 10th day following that of entry into force of the Protocol of 2 December 2015 on the Accession of the Republic of Armenia to the Agreement on the Common Principles and Rules of Medicinal Products Circulation within the Eurasian Economic Union of 23 December 2014, but not earlier than on the 10th day following that the official publication of this Decision.

Members of the Board of the Eurasian Economic Commission:

From the Republic of Armenia	From the Republic of Belarus	From the Republic of Kazakhstan	From the Republic of Kyrgyzstan	From the Russian Federation
V. Gabrielyan	**V. Matyuschevsky**	**A. Mamin**	**O. Pankratov**	**I. Shuvalov**

ADOPTED
by Decision No. 83 of the Council of
the Eurasian Economic Commission
of 3 November 2016

RULES
for Conducting Pharmaceutical Inspections

I. General provisions

1. These Rules establish a common procedure for conducting pharmaceutical inspections to evaluate compliance of a pharmaceutical manufacture with the Rules of Good Manufacturing Practice of the Eurasian Economic Union subject to approval by the Eurasian Economic Commission (hereinafter referred to as the inspection, Rules of Good Manufacturing Practice, respectively).

2. An inspection team shall be established to conduct an inspection. It shall consist of a lead pharmaceutical inspector, team members, including pharmaceutical inspectors, invited experts, and trainees.

The pharmaceutical inspectors shall be responsible for the reliability of the inspection results provided in the inspection report.

II. Procedure

3. A pharmaceutical inspectorate shall conduct an inspection based on schedule inspections, an application for an inspection or at the request of the competent authority of a Member State of the Eurasian Economic Union (hereinafter referred to as the competent authority, Member State, Union, respectively) (e.g., for the purposes of granting a manufacturer's authorisation, granting a marketing authorisation or carrying out investigations related to the quality of medicinal products) in accordance with the programme for inspections of pharmaceutical manufacturers drawn up using the template provided in Appendix 1 (hereinafter referred to as the inspection programme).

The pharmaceutical inspectorate shall inspect pharmaceutical manufacturing facilities for compliance with the Rules of Good Manufacturing Practice.

Where the conclusion of an inspection is positive, the competent authority shall issue a Certificate using the template provided in Appendix 2 (using a competent authority's blank form) which confirms that the facility is compliant with the Rules of Good Manufacturing Practice (hereinafter referred to as the Certificate). The Certificate is valid for 3 years.

Where the conclusion is negative, a Certificate may be suspended or revoked. The procedure for issuing, suspending, or revoking of the Certificate is laid down in Section V of these Rules.

4. There may by three types of inspection: scheduled, unscheduled, or repeated/verification inspection.

Scheduled inspection: An inspection conducted in accordance with pharmaceutical inspectorate's schedule taking into account of the period of validity of a Certificate, based on a pharmaceutical facility's application to issue or renew the Certificate.

Unscheduled inspection: An inspection conducted by the pharmaceutical inspectorate based on an application pharmaceutical facility's application or at a request of a competent authority.

Repeated/verification inspection: An inspection conducted by a competent authority/competent organisation to follow-up a previous inspection to verify amendment of non-compliance revealed before.

5. When an application for a scheduled inspection is submitted, it shall be conducted by the pharmaceutical inspectorate of the Member State where the inspected manufacturing site is established. If the inspected manufacturing site (of a non-resident manufacturer) is established outside the Union, the inspected party may select among pharmaceutical inspectorates of Member States to conduct the inspection.

An unscheduled inspection triggered within granting a marketing authorisation shall be conducted by the pharmaceutical inspectorate of a Member State selected in accordance with the Rules for granting a marketing authorisation and assessment of medicinal products for human use subject to approval by the Commission.

Where a repeated/verification inspection to be conducted, its date shall be determined by the pharmaceutical inspectorate.

6. The inspection team shall be created by a relevant order of the pharmaceutical inspectorate director and consist of employees of the pharmaceutical inspectorate and invited experts, where applicable, based on the procedures laid down in the pharmaceutical inspectorate quality manual in accordance with the Common Quality System Requirements for Pharmaceutical Inspectorates of the Eurasian Economic Union Member States subject by the Eurasian Economic Commission (hereinafter referred to as the Common Quality System Requirements for Pharmaceutical Inspectorates.

The requirements for the inspection team size, the qualification level of pharmaceutical inspectorate personnel and the experts invited to the inspection team shall comply with the quality manual requirements set out for inspection of the concerned type of pharmaceutical manufacturing.

Where trainees are included in the inspection team, their status shall be stated in the order establishing the inspection team. The trainees shall not participate in categorizing the certificates issued based on conclusions of the inspection.

7. The lead inspector and inspection team members shall preliminarily examine documents and other available information pertaining to the inspection.

Not later than 30 days prior to the first day of an inspection, the lead inspector shall ensure that inspection programme and checklists are in place, using template provided in Appendix 3 or other forms of work records as laid down in the pharmaceutical inspectorate quality manual.

The lead inspector shall assign functions to the inspection team members and coordinate the preparatory activities.

8. At the beginning of an inspection, an opening meeting shall be held with the representatives of an inspected pharmaceutical undertaking where the lead inspector shall introduce the inspection team members, meet with the management and officials of the inspected undertaking, communicate the objectives and scope of the inspection, inspection programme and timetable, make a statement on confidentiality, and answer to questions posed by the inspected undertaking.

9. During the inspection, the inspection team members shall inspect appropriate facilities, read the documents and records, interview the officials of an inspected undertaking and observe their activities at workplaces in accordance with the inspection programme. The information gathered shall be entered into the checklist or other forms of work records.

10. If necessary, samples of materials or products may be collected during the inspection and sent for testing to a competent control laboratory. The cost of these samples is not reimbursed.

11. At the end of each inspection day, the lead inspector shall hold a meeting with the inspection team members and discusses their preliminary observations which, if necessary, shall also be discussed with the officials of the inspected pharmaceutical undertaking. In case of any disagreement, the inspection team members shall answer questions of the inspected pharmaceutical undertaking representatives.

The clarification of any observation made during the inspection provided by inspected undertaking officials shall be taken into account by the inspection team.

12. At the final meeting with the officials of the inspected pharmaceutical undertaking, the inspection team shall announce the preliminary conclusions of the inspection and discuss the revealed non-compliance with the view of amending thereof taking appropriate corrective and preventive actions.

In case any critical non-compliance, the lead inspector shall immediately report to the appropriate competent authority on this issue.

III. Reporting procedure

13. The inspection team members shall complete checklists or other forms of work records and submit them to the lead inspector.

14. The lead inspector shall draw up a report using a template provided in Appendix 4 within the period prescribed by the pharmaceutical inspectorate quality manual but not later than 30 days beginning with the day the inspection is concluded.

Where material or product samples were taken, the report shall be drawn up once the testing results have been received from the control laboratory. The period set out in the first sub-paragraph shall begin with the day the lead inspector receives the said testing results.

The report shall be made in 2 copies and signed by the lead inspector and the inspection team members.

One copy of the report shall be sent to the inspected party together with a cover letter within 5 calendar days from the day it was signed off, and the second copy shall be archived at the pharmaceutical inspectorate.

Upon request of the competent authority, a copy of the report shall be made available to it.

15. The pharmaceutical inspectorate shall ensure the safety and confidentiality of the information in the inspection documents.

IV. Follow-up inspection

16. Where non-compliance have been revealed during inspection, the inspected pharmaceutical undertaking, within the period set out the pharmaceutical inspectorate quality manual but not later than 30 days beginning with the day the report was receive, shall send a response with an attached plan of corrective and preventive actions and a report on implementation thereof to the pharmaceutical inspectorate where it shall be read by the lead inspector and all inspection team members who conducted the inspection.

Within 30 days from the date the above response is received, the pharmaceutical inspectorate shall assess the information provided therein and, if necessary, conduct a repeated/verification inspection. The results of the assessment and the repeated/verification inspection shall be reported to the inspected party in accordance with Section III of these Rules.

17. If the inspected pharmaceutical undertaking provides documents demonstrating the implementation of corrective and preventive actions, the repeated/verification inspection is not mandatory.

18. If the corrective and preventive actions are recognised as unacceptable, the communication referred to in paragraph 16 of these Rules shall be continued. The scope of the repeated/verification inspection shall correspond to the revealed non-compliance and corrective and preventive actions.

19. The Certificate shall be issued when the undertaking amends all critical and substantial non-compliance and other cases of non- compliance if they, when considered together, represent substantial non-compliance.

V. Issuance, suspension, or revocation of a Certificate

20. The competent authority may issue, suspend or revoke the Certificate according to the inspection results.

21. To obtain the Certificate, the following documents shall be submitted:

a) for a (resident) manufacturer established in a Member State:

an application;

a copy of the medicinal product manufacturer's authorisation, where available;

a copy of the manufacturing site master file in accordance with Part III of the Rules of Good Manufacturing Practice;

a list of the medicinal products (to be) manufactured at the manufacturing site;

b) for a (non-resident) manufacturer:

an application in Russian and, subject to the applicable laws of the Member State, in the official language of the Member State;

a certified copy of the medicinal product manufacturer's authorisation for the manufacturing site;

a certified copy of the document issued by a competent authority/competent organisation in the medicinal product manufacturer's country of origin confirming that manufacture/manufacturing site is in compliance with the Rules of Good Manufacturing Practice applied in the manufacturing country, where available;

a copy of the site master file (in Russian);

a list of the medicinal products (to be) manufactured at the manufacturing site.

22. The inspection procedure shall include the following steps:

a) receipt and assessment of submitted documents;

b) coordination of the inspection period with the pharmaceutical undertaking and furnishing the inspected party with the inspection programme;

c) conducting the inspection of the manufacturing site;

d) laboratory control of material or product samples taken, as appropriate;

e) drawing up a report on inspection;

f) making a decision whether to issue a Certificate.

23. The applications for issuing a Certificate, requests of competent authorities to conduct an inspection, decisions on issuance, refusal to issue and to suspension or revocation a Certificate shall be recorded according to procedure set out in the pharmaceutical inspectorate quality manual.

24. Deadlines for conducting specific inspection steps referred to in paragraph 22 of these Rules shall be laid down in accordance with the applicable laws of the Member States.

The Certificate shall be issued within a maximum of 90 days beginning with the last day of the last inspection.

25. Where critical non-compliance with the Rules of Good Manufacturing Practice is revealed during inspection, the pharmaceutical inspectorate shall send an appropriate report on the non-compliance revealed to the competent authority, and based on that report the competent authority may decide to suspend or revoke the Certificate, and the inspected pharmaceutical undertaking shall be notified in writing on such a decision as well as the competent authorities of other Member States and the Eurasian Economic Commission.

The decision to suspend or revoke the manufacturer's authorisation shall be taken by the competent authority in accordance with the applicable laws of the Member State.

26. If the inspected pharmaceutical undertaking appeals against the results of the pharmaceutical inspection, the pharmaceutical inspectorate shall consider complaints in accordance with, and within the period, the pharmaceutical inspectorate quality manual.

Any complaints/appeals against decisions of the pharmaceutical inspectorate shall be brought in accordance with the applicable laws of the Member States.

27. Information on any issued, withdrawn, suspended, or revoked Certificates shall be entered into the competent authorities' databases and into the Integrated Information System of the Union.

APPENDIX 1
to the Rules for Conducting
Pharmaceutical Inspections

(template)

PROGRAMME
of Conducting Pharmaceutical Inspections of the Manufacture of Medicinal Products of

_____

(the name of the inspected undertaking, manufacturing site,

_____

and pharmaceutical form)

for compliance with the Rules of Good Manufacturing Practice of the Eurasian Economic Union

1. Reason for inspection_____
2. Objectives of the inspection_____
3. Scope of the inspection_____
4. Date and place of inspection_____
5. Composition of the inspection team _____
6. Duties of inspection team members_____

Scope of inspection (section of the Rules of Good Manufacturing Practice of the Eurasian Economic Union)*	**Full name of inspector/ expert**	**Full name of official of the inspected party ****
I. Pharmaceutical quality system		
1. Quality manual		
2. Functions and responsibilities of the management		
3. Management review		
4. Change management system		
5. Supplier and contractor management system		
6. Handling deviations and nonconformities		
7. Corrective and preventive actions system		
8. Product release system		
9. Product quality reviews		
10. Quality risk management system		
II. Personnel		
1. Organisation structure		

2. Key personnel		
3. Training system		
4. Hygiene of personnel		
5. Consultants		
III. Premises and equipment		
1. Design and qualification of premises, equipment, and utility systems		
Monitoring, cleaning, and maintenance		
2. Warehousing, manufacturing, and ancillary areas		
3. Quality control areas		
IV. Documentation		
1. Documentation and records management		
2. Storage of documents		
3. Procedures and records		
V. Production		
1. Cross-contamination prevention		
2. Validation of cleaning processes and procedures		
3. Source materials and packaging materials		
4. Manufacturing process and in-process control		
5. Packaging		
6. Manufacturing documentation and records		
7. Finished products: storage and distribution		
8. Handling of out-of-specification products		
VI. Quality control		
1. Quality control system		
2. Good laboratory practice		
3. Documentation on quality control		
4. Sampling		
5. Testing		
6. Control and retained samples		
7. Ongoing stability testing programme		
8. Validation and transfer of test methods		
VII. Outsourcing		
VIII. Complaints and product recalls		
IX. Self-inspection		

* For illustrative purposes only.

** May be completed at an opening meeting.

7. Inspection schedule

Start date and time*	Stage of conducting the inspection **
	1. Opening meeting
	2. Introduction to the quality system
	3. Inspection of warehousing and manufacturing areas
	4. Inspection of utility systems and ancillary areas
	5. Inspection of quality control areas
	6. Reviewing documentation of the quality system
	7. Reviewing documentation on the hygiene training of the personnel
	8. Reviewing manufacturing documentation
	9. Reviewing documentation on quality control
	10. Meeting of the inspection team
	11. Final meeting

* May be completed at an opening meeting.

** For illustrative purposes only.

8. Approximate deadline for submitting an inspection report.

APPENDIX 2
to the Rules for Conducting
Pharmaceutical Inspections

TEMPLATE
of the Certificate of Compliance of the Manufacturer with the Rules of Good Manufacturing Practice of the Eurasian Economic Union

EURASIAN ECONOMIC UNION CERTIFICATE OF COMPLIANCE WITH THE RULES OF GOOD MANUFACTURING PRACTICE OF THE EURASIAN ECONOMIC UNION

No._____
(Form No)

No._____
(Certificate No.)

Valid from_____ to_____ *

Issued based on pharmaceutical inspection conducted pursuant to the Rules for Conducting Pharmaceutical Inspections.

_____
(The full and short name of the competent authority)

hereby certifies the following:
a pharmaceutical inspection of

_____
(full name of the manufacturer)

_____
(address of the manufacturing site)

has been conducted
in response to (specify one of the following):
the application No. _____for granting a manufacturer's authorisation;
a schedule of pharmaceutical inspections of holders of manufacturing authorisation No._____;
application No._____ for granting a marketing authorisation of medicinal products;

_____
(other)

Based on the information obtained during the latest pharmaceutical inspection,_____
(date)
it is considered that this pharmaceutical manufacturer complies with the Rules of Good Manufacturing Practice of the Eurasian Economic Union.
This Certificate confirms that status of the manufacturing site as of the date of the pharmaceutical inspection, and it cannot be considered as a document confirming status of compliance after 3 years from the date of completion of this pharmaceutical inspection. The validity period of the Certificate may be reduced or extended by applying appropriate risk management principles, provided that there is a respective record in the box 'Limitations or explanatory notes regarding the scope of application of this Certificate'.

This Certificate is valid only if all of its pages (main and additional) are presented.

The authenticity of this Certificate may be verified in the database.

_____
(name of the competent authority)

If the Certificate is unavailable in the mentioned database, please contact the issuing competent authority.

(additional sheet)

Page_____

□ Medicinal products for human use
□ Veterinary medicinal products
□ Investigational medicinal products

Manufacture and quality control

I. MANUFACTURING OPERATIONS - MEDICINAL PRODUCTS

1. Sterile products

□ 1. Aseptically prepared (processing operations for the following pharmaceutical forms):

□ Large volume liquids
□ Small volume liquids
□ Dispersions
□ Lyophilisates
□ Solids and implants
□ Semi-solids
□ other products_____
(please specify the type of products or activities).

□ 2. Terminally sterilised (processing operations for the following pharmaceutical forms):

□ Large volume liquids
□ Small volume liquids
□ Solids and implants
□ Semi-solids
□ Other products, pharmaceutical forms_____
(please specify the type of products or activities)

□ 3. Batch certification

2. Non-sterile products

□ 1. Non-sterile products (processing operations for the following pharmaceutical forms):

□ Capsules, hard shell
□ Capsules, soft shell
□ Chewing gums
□ Impregnated matrices
□ Liquids for external use
□ Liquids for internal use
□ Medicinal gases
□ Other solid dosage forms
□ Pressurised preparations
□ Radionuclide generators
□ Semi-solids
□ Suppositories
□ Tablets
□ Transdermal patches
□ Intraruminal devices
□ Other products, pharmaceutical forms_____
(please specify the type of products or activities)

□ 2. Batch certification

3. Biological medicinal products

□ 1. Biological medicinal products:

□ Blood products
□ Immunological products
□ Cell therapy products
□ Gene therapy products
□ Tissue engineering products
□ Biotechnological products
□ Human or animal extracted products
□ Other products_____
(please specify the type of products or activities)

□ 2. Batch certification (list of product types):
□ Blood products
□ Immunological products
□ Cell therapy products
□ Gene therapy products
□ Tissue engineering products
□ Biotechnological products
□ Human or animal extracted products
□ Other products_____
(please specify the type of products or activities)

4. Other products or manufacturing activities

□ 1. Manufacture of:

□ Herbal products
□ Homoeopathic products
□ Other products_____
(please specify the type of products or activities)

□ 2. Sterilisation of active substances, excipients, finished products:
□ Filtration
□ Dry-heat
□ Moist heat
□ Chemical
□ gamma irradiation
□ Electron beam.
□ 3. Other_____
(please specify the type of products or activities)

□ 4. Primary packaging:
□ Capsules, hard shell
□ Capsules, soft shell
□ Chewing gums
□ Impregnated matrices
□ Liquids for external use
□ Liquids for internal use
□ Medicinal gases
□ Other solid dosage forms
□ Pressurised preparations
□ Radionuclide generators
□ Semi-solids
□ Suppositories

□ Tablets
□ Transdermal patches
□ Intraruminal devices

□ Other products, pharmaceutical forms _____
(please specify the type of products or activities)

□ 5. Secondary packaging
□ 6. Release control testing
□ 7. Microbiological: sterility
□ 8. Microbiological: non-sterility
□ 9. Chemical/physical
□ 10. Biological

I. QUALITY CONTROL OF IMPORTED MEDICINAL PRODUCTS

□ 1. Quality control of imported medicinal products:

□ Microbiological: sterility
□ Microbiological: non-sterility
□ Chemical/physical
□ Biological.
□ 2. Batch certification of imported products
□ Sterile products:
□ Aseptically prepared
□ Terminally sterilised
□ Non-sterile products
□ Biological medicinal products:
□ Blood products
□ Immunological products
□ Cell therapy products
□ Gene therapy products
□ Tissue engineering products
□ Biotechnological products
□ Human or animal extracted products
□ Other products_____
(please specify the type of products or activities)
□ 3. Other importation activities:
□ Site of physical importation
□ Importation of intermediates for further processing.
□ Other _____
(please specify the type of products or activities)

Limitations or explanatory notes regarding the scope of application of the Certificate:
_____
_____
_____

_____ _____

(full name, position) (signature)

Seal:

(Form No.)

*The validity period of the Certificate begins with the last day of the latest pharmaceutical inspection of the pharmaceutical undertaking.

APPENDIX 3
to the Rules for Conducting
Pharmaceutical Inspections

(template)

CHECKLIST

Paragraphs of the Rules of Good Manufacturing Practice of the Eurasian Economic Union	Control question	Inspected item	Information (of the Certificate) on compliance	Information (of the Certificate) on non-compliance
1	2	3	4	5

APPENDIX 4
to the Rules for Conducting
Pharmaceutical Inspections

(template)

REPORT
on Pharmaceutical Inspection

(Title page)

_____

(organisation's name)

_____

(pharmaceutical inspectorate's name)

_____

(address, telephone number, email address, website address)

The inspection of manufacture and quality control of the medicinal products for compliance with the Rules of Good Manufacturing Practice of the Eurasian Economic Union:

_____

(name of the inspected pharmaceutical undertaing)

Address: _____

Reason: _____

1. Summary

1. Name and address of the manufacturing site inspected	
2. Licence	
3. Summary of activities at the inspected undertaking	Manufacture of active substances □ Manufacture of medicinal products □ Manufacture of intermediates or bulks □ Filling and packaging □ Importation □ Contract manufacturing □ Laboratory testing □ Distribution of a medicinal product batch □ Other □
4. Date of inspection	
5. Inspectors/experts	
6. No of inspection (if available)	

2. Introductory information

1. Brief description of the inspected party and site	
2. Date of previous inspection*	
3. Inspectors conducted the previous inspection	
4. Main changes since the previous inspection	
5. Objective of the inspection	
6. Areas inspected	
7. Personnel of the inspected party participating in the inspection	
8. Documents submitted by the inspected party prior to the inspection	

* If it is not the first inspection for the undertaking, please specify the dates of all previous inspections.

3. Observations and results of the inspection

1. Quality management	
2. Personnel	
3. Premises and equipment	
4. Documentation	
5. Production	
6. Quality control	
7. Outsourcing	
8. Complaints and product recall	
9. Self-Inspection	
10. Distribution and shipment	
11. Assessment of the manufacturing site master file	
12. Miscellaneous	

4. List of non-compliance

Critical*	
Essential**	
Other***	

* Non-compliance posing a substantial risk for manufacturing a medicinal product that might be harmful to humans.

** Non-compliance that is not critical but:

- have resulted or may result in manufacturing a medicinal product that does not comply with the marketing authorisation application dossier;
- demonstrates substantial deviations from the Rules of Good Manufacturing Practice of the Eurasian Economic Union;
- shows substantial deviations from the requirements of other pharmaceutical legal acts;
- demonstrates the inability of the inspected pharmaceutical undertaking to manufacture medicinal products of consistent quality or the inability of the qualified person of the inspected undertaking to perform his/her duties;
- while being insignificant individually, when taken together, they present a significant non-compliance and shall be interpreted and recorded as such.

*** Non-compliance that is not critical or significant, but demonstrates a deviation from the Rules of Good Manufacturing Practice subject to approval by the Eurasian Economic Commission.

5. Final meeting and assessment of manufacturer's response

Comments of the inspected party's representatives made at the final meeting	
Assessment of the inspected party's response following observations	
Documents and/or samples taken during the inspection	

6. Final recommendations and findings

Recommendations	
Findings	

The pharmaceutical inspection report
drawn upand signed by:_____

(signatures of the inspection team members)