FREQUENTLY ASKED QUESTIONS ON GOOD MANUFACTURING PRACTICE (GMP) AND GOOD DISTRIBUTION PRACTICE (GDP) INSPECTIONS BY NATIONAL PAHARMACEUTICAL REGULATORY AGENCY (NPRA) DURING COVID-19 PANDEMIC

How does NPRA conduct GMP inspections during COVID-19 pandemic?

The Movement Control Order (MCO) was implemented under Prevention and Control of Infectious Diseases Act 1988 and Police Act 1967 commencing 1th March 2020. With reference to a letter issued by The Chief Secretary to the Government related to the control of infectious diseases (Ref: JPM.KSN.100-2/2/5Jld.3(52); dated 13th March 2020) and a letter related to restrictions on the Ministry of Health (MOH) employees to travel abroad (Ref: KKM.500-6/4/2 JLD 6(57); dated 5th March 2020), NPRA has decided to **suspend** all national and foreign GMP Inspections which has been scheduled for the year of 2020 until further announcement made by the government.

Subsequently, the government announced the implementation of Conditional Movement Control Order (CMCO) which was effective on the 4th May 2020 allowing most economic and social sector in the country to start operating with implementation of strict Standard Operating Procedure (SOP) set by the Ministry.

Due to this unprecedented situation, the following are NPRA's plan of action to conduct Good Manufacturing Practice (GMP) and Good Distribution Practice (GDP) inspections that has been postponed since 18th March 2020.

The following are the frequently asked questions related to the management of GMP and GDP Inspections during the period of crisis for industry guidance;

A. NATIONAL GMP INSPECTIONS
B. FOREIGN GMP INSPECTIONS
C. GDP INSPECTIONS

A. NATIONAL GMP INSPECTIONS

1. Which manufacturers are involved in this revised inspection procedure?

Manufacturers involved in the manufacturing of to be registered/ registered products under Drug Control Authority (DCA) and to be notified/ notified cosmetics under NPRA.

2. What are the types of GMP inspections conducted by NPRA?

The types of inspections conducted by NPRA are:

(i) Routine GMP Inspection – GMP Inspection which has been scheduled for the current year.

(ii) Non-routine GMP Inspection which includes:

- Initial Inspection: Inspection conducted on new premises with an intention to manufacture notified cosmetics only.
- Pre-Licensing Inspection: Inspection conducted on new premises with an intention to manufacture registered products (such as pharmaceuticals, health supplements and traditional products).
- Pre-Approval Inspection: Inspection conducted on new production line of registered products/ notified cosmetics manufacturers
- Pre-Certification Inspection: Inspection conducted on local premises that are not regulated by Drug Control Authority such as foreign manufacturer, active pharmaceutical ingredient manufacturer and Cell and Gene Therapy Products (CGTP) manufacturer.
- Verification Inspection: Inspection conducted following a punitive action.
- Investigation Inspection: Investigation Inspection is an inspection conducted on premises based on complaint received and product recall activity.

Kindly refer to the Frequently Asked Questions (FAQs): Good Manufacturing Practice (GMP) Inspection by National Pharmaceutical Regulatory Agency (NPRA) for further information pertaining to the requirement of GMP.

3. How is GMP Inspection being conducted throughout the period of COVID-19 pandemic in Malaysia?

Ideally, all routine and non-routine GMP inspections are conducted on-site whereby an inspector, or a team of inspectors will perform the inspection at the premises throughout the duration of inspection. However, due to the current pandemic situation, a different approach to GMP inspection has been introduced based on the following mechanism:

3.1 Routine GMP Inspection for the Year of 2020

3.1.1 How does NPRA conduct routine GMP inspections scheduled for the year of 2020?

Routine GMP inspections which has been scheduled for the year of 2020 is suspended during the period of MCO/CMCO.

After MCO/CMCO is lifted by the government, the decision to conduct GMP inspections on-site or off-site (through Desktop Inspections) will be decided based on risk assessment conducted by a team of assessors related to the size of manufacturing premises, complexity of manufacturing process, the number of GMP deficiencies reported in the previous inspections, major changes by the manufacturer, product complaints received by NPRA and regulatory actions taken on the manufacturer.

Where on-site inspection is deemed necessary on the manufacturer, the inspection may be conducted in the year of 2020 or based on the announcement made by the government related to the MCO/CMCO.

3.1.2 What does it mean by inspection through documentation evaluation/ Desktop Inspection?

Inspection through documentation assessment/ Desktop Inspection is a method of inspection whereby an inspector/ a team of inspectors conducts documentation evaluation. The list of documents for evaluation will be forwarded to the manufacturer by an inspector whereby the documents to be reviewed by an inspector/ a team of inspectors are the frequently requested documents during an ideal on-site inspection.

3.1.3 How does NPRA perform GMP inspection through Desktop Inspection?

Below is the summary of Desktop Inspection process:

1. The GMP inspector in-charge will communicate with the manufacturer on the arrangement of the inspection and the list of documents required for evaluation.

2. The GMP inspector will prepare the inspection/ document evaluation agenda based on inspection type.

3. The respective GMP inspector(s) will evaluate the documentation provided by the manufacturer.

4. GMP inspector(s) may further communicate with the manufacturer's representative to request additional documents.

5. An inspection report will be forwarded to the manufacturer.

6. The manufacturer is required to submit Corrective and Preventive Action Report (CAPA) based on the GMP deficiencies reported.

7. The inspector(s) receives and evaluates CAPA report forwarded by the manufacturer.

3.1.4 How about routine inspection fee that has been paid through QUEST 3+ system for inspections which has been scheduled for the year of 2020?

Manufacturer may request for refund for routine inspection fee paid for the year of 2020. A letter requesting the refund should be addressed to GMP Section, Centre for Compliance and Quality Control (CCQC) with a copy of current bank statement and receipt for the paid inspection fee. This application for refund can be forwarded to GMP Section, CCQC latest by October 2020.

If request for refund is not received by the month of October 2020, the amount paid by the manufacturer will be carried forward to next routine inspection.

3.2 Non-Routine GMP Inspection

3.2.1 How does NPRA conduct non-routine GMP inspections during the period of MCO/CMCO?

The following mechanism of off-site inspection will be conducted throughout the period.

a) Inspection through documentation evaluation only (Desktop Assessment).

b) Inspection conducted remotely from NPRA's office.

3.2.2 What does it mean by inspection through documentation evaluation/ Desktop Assessment?

Inspection through documentation evaluation/ Desktop Assessment is a hybrid method of inspection that involves documentation evaluation and a subsequent follow-up on-site inspection.

Documents that will be evaluated are specific documents pertaining to the application of non-routine inspection that is related to the premises or new production line. After evaluation is deemed satisfactory, a letter will be issued to the manufacturer to inform the outcome of the assessment.

An on-site inspection to physically verify the new facility/ production line will be scheduled after documentation assessment is deemed satisfactory.

3.2.3 How does NPRA perform GMP inspection through Desktop Assessment?

Below is the summary of Desktop Assessment process:

1. An application letter for Pre-Approval Inspection is forwarded to GMP Section, CCQC, NPRA.

2. The application received is then forwarded to GMP inspector in-charge.

3. The GMP inspector in-charge will communicate with the manufacturer on the arrangement of the inspection and the list of documents required for evaluation.

4. The respective GMP inspector(s) will evaluate the documentation provided by the manufacturer.

5. GMP inspector(s) may further communicate with the manufacturer's representative to request additional documents.

6. A letter will be issued to the manufacturer to inform the outcome of the inspection (Desktop Assessment).

7. An on-site inspection will be conducted within the period of 3 months after the date of letter issued by GMP Section, CCQC upon satisfactory Desktop Assessment. This inspection can be conducted after MCO/CMCO is lifted or concurrently with the upcoming routine inspection (whichever comes first).

3.2.4 Why does NPRA need to perform on-site inspection after a satisfactory status of Desktop Assessment?

The intention of GMP inspections conducted through the mechanism of Desktop Assessment is to facilitate regulatory application process such as registration of new product(s) and/or renewal of products and notification of cosmetics.

Documentation assessment will be conducted during the initial stage whereas on-site inspection can be conducted within 3 months period from the letter issued by GMP Section, CCQC upon satisfactory Desktop Assessment. The on-site inspection can also be conducted after MCO/ CMCO is lifted concurrently with upcoming routine GMP inspection (whichever comes earlier).

If the desktop assessment is deemed unsatisfactory, the manufacturer is unable to submit new application of product registration or cosmetics notification.

3.2.5 What does it mean by remote GMP inspection?

Inspections that is conducted remotely through a web-based/ online video conferencing application, which is agreed by both the manufacturer and team of GMP inspectors.

The documents that will be evaluated are the frequently requested documents during an ideal on-site inspection.

3.2.6 How does NPRA perform GMP inspection through Remote Inspection?

Below is the summary of Remote Inspection process:

1. An application letter for Pre-Licensing/ Initial Inspection is forwarded to GMP Section, CCQC, NPRA through QUEST 3+System. The manufacturer has to ensure the settlement of RM 1,000 inspection fee.

2. The application received is then forwarded to GMP inspector in-charge.

3. The GMP inspector in-charge will communicate with the manufacturer on the arrangement of the inspection and the list of documents required for evaluation. The GMP inspector in-charge may also forward another invoice for inspection fee calculated based on the number of inspector/ assessors and the duration of the remote inspection days to be conducted.

   [Note: Usually, the duration of pre-licensing inspection on pharmaceutical manufacturer is more than 1 day. The full amount of inspection fee must be paid upfront before the inspector(s) proceed with the process of remote inspection.]

4. The inspector(s) must receive all documents requested earlier on before the inspection is conducted through a web-based/ online video conferencing application.

5. Inspection will be conducted through an online platform (such as Skype etc.) according to the inspection agenda prepared by the inspector/ team of inspectors.

   - Opening Meeting.
   - Outcome of documentation evaluation and further discussion/ document requested if it is deemed necessary.
   - The manufacturer conducts a virtual tour on the new facility that has been established.
   - Closing Meeting.

6. An inspection report will be forwarded to the manufacturer.

7. The manufacturer is required to submit Corrective and Preventive Action Report (CAPA) based on the GMP deficiencies reported.

8. The inspector(s) receives and evaluates CAPA report forwarded by the manufacturer.

3.2.7 Which type of non-routine inspection can be conducted off-site during MCO/CMCO period?

NOT ALL type of non-routine inspections can be done during MCO/CMCO period.

The priority for non-routine inspection will be given to the manufacturer which requires GMP status for the purpose of GMP Certificate issuance, registration of

pharmaceutical products or manufacturers who intends to manufacture essential medicines during this challenging period.

Currently, NPRA agreed to conduct the following type of non-routine inspection throughout the period of MCO/CMCO based on the following mechanism:

a) Pre-Approval Inspection to be conducted through Desktop Assessment from 1st June 2020 until further notice from NPRA.

b) Pre-Licensing Inspection to be conducted through Remote Inspection from 1st June 2020 until further notice from NPRA.

c) Pre-Licensing Inspection to be conducted through Remote Inspection from 1st June 2020 until further notice from NPRA.

However, NPRA may consider performing other non-routine inspection, which deemed essential based on the justification given by the manufacturers and the current pandemic situation.

3.2.8 If I have submitted Pre-Approval Inspection application through the QUEST 3+ System and paid for the inspection fee, can I request for refund if NPRA decides to perform inspection through Desktop Assessment?

Manufacturer may request for refund for routine inspection fee paid for the year of 2020. A letter requesting for the refund shall be addressed to GMP Section, CCQC, with a copy of current bank statement and receipt for the inspection fee paid.

4. What are the differences between the off-site GMP inspections conducted by NPRA?

Below are the differences of off-site inspections conducted by NPRA:

Off-site Inspection / Item	Desktop Inspection	Desktop Assessment	Remote Inspection
1. Definition	Routine inspection conducted through documentation evaluation.	Hybrid method of inspection that involves documentation evaluation and a subsequent follow-up on-site inspection.	Inspection conducted remotely through a web-based/ online video conferencing application agreed by both parties.
2. Type of GMP Inspection	Routine Inspection	Pre-approval Inspection	Initial Inspection & Pre-Licensing Inspection
3. Application of Inspection	Application is not required. Routine inspections will be conducted based on the annual routine list. Pre-payment of inspection fee must be done prior to the inspection.	An application letter for Pre-Approval Inspection has to be forwarded to GMP Section, CCQC, NPRA	An application through QUEST 3+ System is made by the manufacturer.

Item \ Off-site Inspection	Desktop Inspection	Desktop Assessment	Remote Inspection
4. Outcome of evaluation/ inspection	The manufacturer will receive the report of the inspection/ assessment. If the outcome of assessment is unsatisfactory, on-site inspection to be conducted.	A letter will be issued to the manufacturer to inform the outcome of the inspection.	The manufacturer will receive inspection report form the inspector(s).
5. Requirement for On-site Inspection	N/A	An on-site inspection will be conducted within the period of 3 months after the date of letter issued by GMP Section, CCQC upon satisfactory Desktop Assessment. On-site inspection can also be conducted after MCO/ CMCO is lifted concurrently with upcoming routine GMP inspection (whichever comes earlier).	N/A
6. Extension of GMP Status	Extension of GMP status is valid for up to 2 years.	N/A	If the outcome of the Remote Inspection is satisfactory, extension of GMP status is valid for up to 2 years.
7. Application of GMP Certificate	Upon satisfactory outcome of inspection, application of GMP Certificate can be made via QUEST 3+ System.	Upon satisfactory outcome of **on-site** inspection, application of GMP Certificate can be made via QUEST 3+ System.	Upon satisfactory outcome of inspection, application of GMP Certificate can be made via QUEST 3+ System.
8. Company preparation	Manufacturer may submit required documents for inspection/evaluation in soft copy format.		Manufacturer may submit require documents for inspection/evaluation in soft copy format. In addition, manufacturers should have internet access and telecommunication application as agreed with GMP inspectors for visual inspection purpose.

For further enquiries/ information, kindly refer to:

a. Frequently Asked Questions (FAQs): Good Manufacturing Practice (GMP) Inspection through the following link https://www.npra.gov.my/index.php/en/faqs-compliance-and-licencing/faqs-gmp-inspection.html

b. Officers-on-duty via phone number 03-78835491 or email: gmp@npra.gov.my

B. FOREIGN GMP INSPECTIONS

1. What is the approach taken by NPRA in managing foreign GMP inspection that had been postponed during this COVID-19 pandemic?

During this interim period, NPRA have implemented mitigation plan for foreign GMP inspection scheduled for the year 2020 to ensure registration process (new registration and/or renewal) are uninterrupted.

Where possible, other pathways are being used to facilitate registration process for pending foreign GMP inspection applications including requesting additional information from applicants and existing inspection reports for facility that had been inspected by other competent authorities (e.g. Pharmaceutical Inspection Co-operation Scheme (PIC/S), ASEAN Listed Inspection Services).

However, foreign GMP inspection will be resumed once COVID-19 pandemic had subside. Product Registration Holder (PRH) will be informed from time to time regarding re-scheduling of affected foreign GMP inspections. Inspection will be prioritized based on the risk whereby all manufacturing facilities will be evaluated using risk-based approach to determine the need for on-site inspection.

2. How will inspection postponement affect the existing foreign GMP inspection application?

To ensure uninterrupted regulatory process flow, NPRA will make sure that the action plan is updated from time to time based on the emerging situation that may affect the scheduling of the foreign GMP inspection.

NPRA will also continue to work directly with the PRH of those impacted applications. PRH are encouraged to be in communication with all the manufacturer to ensure timely responses to any inquiries from NPRA to support the foreign GMP inspection application assessment, if needed.

3. Is there any change in foreign GMP inspection application submission flow due to COVID-19 pandemic?

The process of foreign GMP Inspection application is unchanged despite the pandemic. If PRH wish to put in application for any foreign GMP inspection, they can submit 'Borang Permohonan Pemeriksaan APB Luar Negara (BPFK-501)' along with processing fee of RM 5,000.00 to the GMP Section, CCQC.

4. Can PRH submit 'Borang Permohonan Pemeriksaan APB Luar Negara (BPFK-501)' for manufacturing facilities located in regions that is impacted by COVID-19 related travel restrictions?

Yes, application submission will not be impacted by COVID-19 travel restrictions. NPRA will inform involved PRH's on any updates from time to time.

For any further enquiries / information, kindly refer to:

a. Frequently Asked Questions (FAQs): Foreign Good Manufacturing Practice (GMP) Inspection through the following link https://www.npra.gov.my/index.php/en/faqs-compliance-and-licencing/faqs-gmp-inspection.html

b. Officers-on-duty via phone number 03-78835491 or email: gmp@npra.gov.my

C. GDP INSPECTION

1. Will the GDP inspection be conducted during the COVID-19 pandemic in Malaysia?

Yes, GDP inspection will be conducted on licensed importers / wholesalers either on-site (on-site) or remotely.

2. What are the differences between the above mentioned GDP inspection mechanisms?

The differences between the GDP inspection mechanism mentioned above are as follows:

Item	**Inspection Mechanism**	
	On-site	***Remote***
Method	Field inspection will be conducted on the premises.	Virtual inspection will be conducted on the premises.
Inspection scope	Please refer to Annex 2: General Points to Consider for Auditee in the current GDP Guideline.	
Preparation: **Before inspection**	• The company will be contacted by the inspector (via phone / email) to set the date of inspection. • Documents pertaining to the GDP requirement must be prepared by the company and forwarded to the inspector before the inspection.	• The company will be contacted by the inspector (via phone / email) to set the date of inspection. • Documents pertaining to the GDP requirement must be prepared by the company and forwarded to the inspector before the inspection. • The company needs to familiarise with online communication applications such as Skype, Google Meet, etc. upon mutual agreement by both parties.
Preparation: **During inspection**	• Personal protective equipment such as 3-ply face mask and hand sanitiser should be provided at the premises during the inspection. • The company must ensure that social distancing, good hygiene practice (frequent use of hand sanitiser / hand washing) are properly implemented and complied within the premises.	• The company will have to be ready at least 10-15 minutes before the inspection commencement using an agreed online communication application. • The company must be prepared to move within the premises / store using communication equipment such as camera phones if requested by the inspector for verification purposes.

3. Is my company allowed to choose the mechanism for GDP inspection?

No, the mechanism for GDP inspection will be determined by NPRA based on defined criteria and its priority will be decided based on the risk of the premises and the products being distributed. The inspection mechanism will be notified to the company by the inspector prior to the inspection.

For any further enquiries / information, kindly refer to:

a. Frequently Asked Questions: Good Distribution Practice (GDP) through the following link https://www.npra.gov.my/index.php/en/faqs-compliance-and-licencing/faqs-gdp- inspection.html

b. Officers-on-duty via phone number 03-78835491 or email: saeb@npra.gov.my