



**EDQM – COUNCIL OF EUROPE CONFERENCE  
CERTIFICATION PROCEDURE  
1992-2012: 20 YEARS OF EXPERIENCE  
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**ABSTRACTS**

**PLENARY SESSION, 23 March 2012**

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## **ABSTRACT 1**

### **The Interests, Use and Limits of CEPs**

Georges France, Vice President Global Quality Strategy & International Affiliate  
Quality & Compliance (Novartis, Switzerland)

The value of the CEP procedure, as a reference process for API, is clearly recognised by industry. The process is simple. Rather than having to register in each individual Member State, it is a centralized procedure for evaluation and Registration, with the interesting option for meeting the quality information requirements for the drug substance by referencing the CEP in an MAA. The CEP (Certificate of suitability to the monographs of the European Pharmacopoeia) provides proof for a drug substance manufacturer that the quality is suitably controlled by the relevant monographs of the Ph.Eur., and there is an inspection program for manufacturing sites associated with the procedure.

As well as recognizing the value, the presentation will also review the limitations of this process, including, for example, that the information provided in the certification procedure gives a limited understanding of the API manufacturing process. Other points of interest that will be considered include:

- Improving the visibility of potential GMP issues that could result in the suspension or withdrawal of the CEP certificate
- Challenges with the regulatory expectations: alignment across European agencies and with ICH would facilitate the use of CEPs. The use of CEP outside the EU can also be subject to variability, resulting in additional questions and requests for information.

Some practical proposals will be discussed that may facilitate acceptance of a CEP and simplify the administrative procedure, with the benefit of improved timing and efficiency of the process.

In conclusion the CEP process offers real value and its wider use and acceptance should be encouraged as much as possible.

## ABSTRACT 2

### **The CEP Procedure Now and Tomorrow – A View of the EU Generic Medicines Industry**

Dr Elli Souli, Regulatory Affairs Supervisor (Medochemie Ltd, Cyprus)

The EGA is the official representative body of the European generic and biosimilar pharmaceutical industry, which is at the forefront of providing high-quality affordable medicines to millions of Europeans and stimulating competitiveness and innovation in the pharmaceutical sector.

Today about 50 % of all medicines dispensed in the EU are generic medicines and with more high profile blockbuster products coming off patent over the next few years, the European generic medicines industry will be the major provider of medicines in the EU.

In a survey carried out in January 2012, EGA members, representing both CEP users and CEP holders, largely confirmed that CEPs are widely used by the EU generic medicines industry.

Among others, they highlighted the vast proportion of EU Marketing Authorisations referring to CEPs (where they exist), the use of CEP availability as positive criteria in all companies procurement policies when sourcing API and also a broad acceptability of CEPs in registration procedures worldwide.

According to the EGA membership, the greatest improvements brought to the CEP procedure over the last 20 years were:

- The creation of an EDQM CEP database
- The alignment of the CEP revision/variation system on the EU variation regulation
- The introduction of a disconnection between patent expiry and monograph
- The possibility of ‘sister file’ application

EGA members were generally satisfied with their interactions with the Certification team as well as with the EDQM communication on CEPs (particularly on withdrawals & suspensions).

When asked about possible future evolutions of the CEP procedure and EDQM role, ideas put forward fell into

1. **Short-term, easily implemented proposals** such as:
  - On-line electronic submissions & traceability of the CEP evaluation
  - Enhanced compliance with procedure timelines
  - Enhanced contact with EDQM person responsible for the CEP application
  - Enhanced interactions between EDQM and EU Competent Authorities
  - Maintenance of an up-to-date list of countries accepting standalone CEPs

2. **Other much longer term proposals** requiring more thorough changes:
- Inclusion of dosage form monographs in the EP
  - Expedite CEP procedure where there exists an EU Competent Authorities earlier approval
  - Creation of a ‘CEP Master File’ to limit variations for CEP updates (for CEP users)
  - Creation of a shared repository system for all API related regulatory documentation
  - Sharing EDQM comprehensive expertise (supported by EU Member States) in API assessment and API GMP:
    - Recognition of EDQM GMP Attestation as equivalent to EU GMP certificates
    - Systematic joint EDQM/EU CA inspections and timely issuance of EU GMP certificates (where appl.)
    - (Future) Coordinated ASMF assessment in the EU (with EMA, MS CAs)
    - International co-operation initiatives on API GMP inspections

Finally the EGA considers the CEP procedure a very satisfactory element of the EU regulatory landscape and very much welcomes future opportunities to interact with the EDQM in further evolving the CEP procedure as well as the EU approach to API quality and GMP compliance in general.

## **ABSTRACT 3**

### **Views of the Self-Care Sector**

Christelle Anquez-Traxler, Regulatory and Scientific Affairs Manager, Association of the European Self-Medication Industry (AESGP)

AESGP represents the manufacturers of non-prescription medicines in Europe, which also include producers of herbal medicines.

Overall we very much appreciate the CEP system which enables applicants to replace some of the data needed in Module 3.2.S for drug substances described in the European Pharmacopoeia. This system enables saving of duplication and resources for both API manufacturer and finished product manufacturer and creates a win-win situation for both parties.

However, CEPs seem to change quite often and more transparency as to the level of change which motivates a revision of the CEP and the issuance of the new version would be desirable.

As far as herbal substances or preparations are concerned, here again our members appreciate the CEP system although its application is rather limited. CEPs for herbals are in general considered an interesting and pragmatic option, because stability data of the active substance do not seem necessary according to the EMA guideline on stability testing.

We would also like to make a proposal for the CEP scope to be expanded to homeopathic mother tinctures covered by European pharmacopoeial monographs. As a number of individual Ph.Eur. monographs already exist for homeopathic preparations and for mother tinctures, a CEP could be useful due to the generic character of these preparations. Homeopathic finished products manufacturers would find a great benefit in being able to rely on CEPs for those preparations.

## **ABSTRACT 4**

### **Interests, use and limits of Certificates CEPs**

Mrs Hilde Vanneste, Associate Director Global CMC  
Regulatory Affairs (Janssen Pharmaceutica NV, Belgium)

The CEP procedure has proven to be a workable system that is benchmarked by other health authorities, guarantees confidentiality of data and eases the review of the marketing authorisation application or variations thereof.

The CEP procedure is closely linked to the Ph Eur monograph, which limits its scope to compounds described in the Ph Eur.

However, seen the specific API expertise and the close involvement of EU health authorities in the CEP procedure, industry would support EDQM to play an important role in the centralised review of API information (CEP or Active substance master file).

## **ABSTRACT 5**

Dr Ming Xu, Vice President China Chamber of Commerce for Import & Export of Medicines & Health Products (CCCMHPIE)

### **1. Collaboration between CCCMHPIE and EDQM in the past three years.**

Since 2009, CCCMHPIE and EDQM have co-organized 3 training courses on CEP certification among Chinese pharmaceutical companies, which attracted more than 120 attendees per session, including CEOs, QA, QC, RA people in the companies. The contents the training courses have covered ranged from site inspection, dossiers preparation to detailed technical requirement for starting materials, impurities, residuals, genetic toxicity, etc.

### **2. CEP certifications on the part of Chinese pharmaceutical companies**

According to EDQM, 367 CEPs have been granted to Chinese pharmaceutical companies as of Dec.7, 2011, including 335 valid ones, 32 revoked, suspended or expired ones. Against the backdrop that suspensions and revocation have taken place from time to time, the biggest challenge for the Chinese pharmaceutical companies is how to prepare for the revised CEP application, avoid deficiencies in both the documents and on-site inspection.

### **3. Contribution to the enhancement of quality system in the Chinese pharmaceutical companies**

To get the CEP certification is one of the important preconditions for the Chinese pharmaceutical companies to access the EU market and it has helped to enhance the quality system in China and played a crucial role in meeting the international standards. To organize the training courses on a regular basis will assist Chinese companies in better understanding the rules and regulations concerned by EDQM and avoiding unnecessary difficulties, which will contribute to the sound development of the global pharmaceutical industry.

### **4. Further cooperation and exchange**

It is suggest that EDQM further strengthen its ties and cooperation with related authorities and trade associations across the world and set up regular contacts. Among other things, the exchange at technical level is very important between EDQM and trade associations such as CCCMHPIE. For example, CCCMHPIE is ready to help EDQM to make sure that the notification will be delivered to a correct address, a correct receiving company and a correct point of contact. Moreover, CCCMHPIE is able to assist EDQM in laying out and revising monograph, reporting the difficulties Chinese companies are facing, etc.

## **ABSTRACT 6**

### **The Interests, Use and Limits of Certificates: Viewpoint from Regulatory Authorities from Europe**

Malcolm Dash, Medicines and Healthcare products Regulatory Agency (MHRA),  
UK

CEPs play an important role in the regulation of human and veterinary medicines in Europe. The use of CEPs is an established option to satisfy the registration requirements for the manufacture and control of active substances in all EEA countries, and they can provide assurance regarding TSE and the validation of sterilisation processes.

This presentation will provide an EU perspective on the importance of the certification procedure to regulatory authority assessors and highlight areas of the certification procedure that are of particular interest to assessors. The revision of monographs, post-inspection action against CEPs, and the contribution made to training and education will be discussed. Recognition will be given to the contribution made to the certification procedure by assessors from EEA authorities and the partnership between regulatory authorities and EDQM.

The expectations of the procedure such as the need for high quality assessments and consistency in decision-making will be discussed. It is also important to recognise that the procedure is underpinned by guidelines and policies developed to have consistency with relevant European guidance.

The presentation will discuss the importance of achieving a suitable balance between transparency and protecting commercially-sensitive information, and comment on evolutionary aspects of the scheme.

## **ABSTRACT 7**

### **The benefits and cross-functional links between the Certification procedure, the European Pharmacopoeia, the EMA and National Authorities**

Dr Jean-Louis Robert, Chair of the Joint CHMP/CVMP Quality Working Party and Former Chair of the Certification Steering Committee

The presentation will provide an overview of the initial reasons for the establishment of the Certification Procedure and focus on its development over the years. Changes in the assessment policy in line with evolving regulatory requirements of the national competent authorities will be highlighted. The presentation will demonstrate that same standards are applied in assessing applications for a certificate of suitability, active substance master files and individual marketing authorisation applications.