

Personal Perspectives

Pharmaceutical Inspection Convention (PIC)

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Wherever pharmaceutical products are manufactured, the national regulatory authority has a responsibility to ensure that Good Manufacturing Practices (GMP) are observed through inspection of production areas and operations. This is the responsibility of the national pharmaceutical inspectorate. An underlying tenet of international trade in pharmaceuticals — and, more specifically, of the WHO Certification Scheme on the Quality of Pharmaceutical Products moving in International Commerce — is that trading countries should have comparable inspection procedures and apply equivalent standards. The Pharmaceutical Inspection Convention, described below, was created within Europe with this objective. The scheme stands as a model to national trading partners wishing to develop similar procedures in other regions.

The Convention for the Mutual Recognition of Inspection in respect of the Manufacture of Pharmaceutical Products (the name of which has since been shortened to Pharmaceutical Inspection Convention or PIC) was signed in October 1970. The Convention was initiated in the European Free Trade Area (EFTA) and was signed by all the EFTA countries of the time (Austria, Denmark, Finland, Iceland, Liechtenstein, Norway, Portugal, Sweden, Switzerland and the United Kingdom).

From the outset, the Pharmaceutical Inspection Convention was intended to be limited exclusively to EFTA Member States, but has since become open to any country that can show it has a developed inspection system comparable to that of the signatories. Since its entry into force, several such countries have joined the Convention: Hungary, Ireland, Romania, Germany, Italy and Belgium. Several others are now engaged in the accession process: Australia, France, Czechoslovakia, the Netherlands and Turkey. Others have indicated their interest in joining: Canada, Japan, Luxembourg and South Africa.

The Convention and its operation

In essence, the Convention provides that an inspection of a pharmaceutical plant, from which products are intended to be exported to one of the contracting states, is carried out by its national authority and shall be regarded and assessed by the health authority of the country of importation as if it had been carried out by its own inspectors.

In practice, the procedure functions as follows: the health authority of a member country wishing to obtain information concerning a product which has been or is to be imported, requests information from the national authority of the exporting country about the standards of GMP applied in the producing firm and specific standards appropriate to the manufacture and control of the product in question. The inspectorate in the exporting country sends an inspection report to its counterpart in the importing country which is then in a position to determine whether or not there are any breaches of GMP that would warrant blocking or cancelling importation.

The interests of the manufacturers are safeguarded in that they are entitled to withhold consent for the transmission of the report. Moreover, the information contained in the report may only relate to manufacture and control and exclude any information that might be commercially confidential, such as data concerning technical know-how or financial and commercial matters.

The main advantage of the Convention is that where domestic production is concerned, national systems and standards are not perturbed by having foreign inspectors with slightly different standards coming into the plant. Moreover, efficiency is promoted in that inspections are performed by inspectors who are best acquainted with the firm.

The Convention is based on mutual confidence in the standards of the respective inspection systems

of the contracting states, in the competent national authorities and, even more important, in the persons who actually carry out the inspections and provide the inspection reports.

Committee of officials

A permanent committee of officials, appointed to supervise the operation of the Convention, deals with all technical matters that arise from the Convention. This committee is made up of representatives from the member countries' inspectorates. The committee's tasks are to exchange experience on methods of achieving effective inspections, to promote common training requirements for inspectors, and to make recommendations on matters relating to the implementation of the Convention. A chairman and deputy chairman are elected by the committee to serve a two-year term of office. The committee meets whenever necessary, but at least twice a year.

Good manufacturing practices

The basic principle underlying the whole Convention is that member countries have comparable inspection systems and apply equivalent standards. At a very early stage it was recognized that a common basis of reference would be required for the preparation and exchange of inspection reports. It was necessary to ensure a common language to be used by all inspectors when referring to technical matters relating to the manufacture of pharmaceutical products. Basic standards of GMP were therefore elaborated and adopted in 1972 by the committee of officials. Later, various guidelines were developed to supplement the basic standards: on the manufacture of sterile products, on the handling of starting materials, on manufacture and analysis under contract, on packaging and labelling, on the manufacture of active ingredients and on good practices in control laboratories.

The PIC basic standards and additional guidelines, were issued in the form of recommendations. At the time of their elaboration they represented a goal. Since then, they have become minimum standards acceptable to and applied by all the authorities under the Convention. This evolution provides concrete proof, if any is needed, of the long-term and wide-ranging harmonizing effect of the chosen approach.

It is interesting to note that the PIC standards of GMP have also served as the main basis for the elaboration of the new Economic Community Guide

to GMP. In a spirit of cooperation and in order to provide for one single set of standards in all European countries, the PIC guide to GMP has been aligned with that of the EC. Such harmonization will also extend beyond Europe since Australia is soon to become a PIC member and keen interest in the Convention has been expressed by other overseas countries.

Inspector training

A system such as that represented by the Pharmaceutical Inspection Convention can only function on the basis of mutual confidence between the national health authorities concerned and with the assurance that all inspectors reach and maintain comparable degrees of competence and knowledge, and apply the same principles when carrying out inspections. It was thus essential to ensure a common understanding of GMP rules among all inspectors of the Convention's countries. Seminars are therefore organized regularly so that inspectors have the possibility of considering technical topics of current interest and of discussing means and methods of achieving effective inspections. These seminars contribute substantially to creating, through close personal contacts, the climate of mutual confidence needed for the good functioning of the Convention. Industry representatives are sometimes invited to participate in some of the seminars, and thanks to their contribution, there are useful discussions on various practical aspects and new technology in the manufacture of pharmaceuticals. Another development is the organization of joint visits to manufacturers by small groups of inspectors (normally three) from different countries. This has proved very successful in promoting harmonization by upgrading and approximating the knowledge of the inspectors as well as their approach to manifold problems.

Conclusion

As intended, the Convention has become fully independent from EFTA since its entry into force even if, for practical and historical reasons, support has so far been provided by the EFTA secretariat. The Convention celebrated its 20th anniversary in 1991 and for the past five years more than 200 inspection reports have been exchanged annually. There is no doubt that it has most successfully achieved the objectives originally set for it. Mutual confidence has been created between the competent authorities, and the degree of cooperation established has far exceeded the expectations of the founding members.