



# The IPAC-RS Supplier GMP Guideline: A Platform for New Directions in Supplier Quality

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## INTRODUCTION

The IPAC-RS Supplier Quality Control Working Group was formed in 2000 to:

- Encourage quality through design rather than through testing and enable the provision of consistently high quality OINDP components by promoting the implementation of robust quality systems at OINDP component manufacturers
- Simplify the quality control process by promoting harmonized quality standards for OINDP components

To address these objectives the Working Group created the *Good Manufacturing Practices Guideline for Suppliers of Components for Orally Inhaled and Nasal Drug Products*, published in 2006. [1]

The Guideline establishes standardized and enhanced GMP recommendations specifically for OINDP container closure system and device component suppliers.

Since the Guideline's publication, the IPAC-RS Supplier Quality Control Working Group, consisting of OINDP manufacturers/developers and component suppliers, is developing several new projects stemming from the Guideline:

- International training courses, addressing specific applications of the Guideline, e.g., development of quality agreements
- Turning the Guideline into a standard
- Quality and risk management toolkits for suppliers and pharma
- Discussions regarding the use of Drug Master Files (DMFs)
- A third party auditing function, which would audit against the Guideline

## THE KEY: STRONG PHARMA-SUPPLIER RELATIONSHIPS

The Group recognizes that the key to realizing its objectives is to help build strong, positive relationships among pharma companies and their suppliers, which leads to:

- Improved communication
- More information sharing

The Group has worked to build such relationships by interacting directly with suppliers to develop the Guideline, in workshops on Guideline use, and in its ongoing activities.

## IPAC-RS GMP Guideline

To eliminate duplication and for ease of use, the Guideline is a 3-in-1 document, incorporating:

- ISO 9001:2000
- PS 9000:2001 [2]
- IPAC-RS GMP recommendations

**The Guideline:**

- Provides tools to achieve and maintain compliance with GMP
- Is in alignment with 21 CFR 210-211 and 820
- Applies to suppliers of finished components for OINDP, e.g., canister, reservoir, actuator, pump, etc.
- Suppliers farther back in the supply chain are encouraged to read and follow the guideline

**Benefits of the Guideline include:**

- Increased regulator, pharma, and supplier confidence in quality
- Improved quality
- Relationship building
- Consistent and clear expectations

## QUALITY AGREEMENTS AND DMFS

The IPAC-RS guideline addresses two important aspects of quality management – the quality agreement and the DMF.

**Quality agreements** are contracts between a supplier and customer describing each party's expectations for how to manage the quality of the suppliers' products. In it, responsibilities, information to be shared, and communication processes are detailed and confirmed.

For quality agreements, the Guideline makes recommendations on (but not limited to):

- Detailed change control information (document, material, specification, process, facility/equipment)
- Component testing
- Qualification and/or validation of equipment
- Requirements for raw materials
- Information on material suppliers

The agreement is most often established between pharma and the component supplier (n-1), and for some issues (e.g., change control) must attempt to manage quality that could be impacted by other suppliers farther back along the supply chain. See Figure 1.

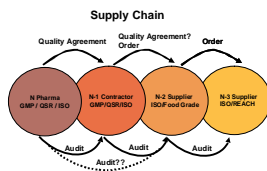


Figure 1. Quality agreements and the supply chain. The agreement is usually established between pharma and n-1 suppliers, and must attempt to manage some quality issues impacted by suppliers farther back in the supply chain.

DMFs are filed directly with FDA by companies to provide information on manufacturing processes, materials composition, and any other information that may be important for review of a marketing application.

Figure 2 presents illustrations of the communication channels available with the traditional use of the DMF system along with those available with the recommended use of the DMF system. When the DMF system is used in the recommended manner, the communication and collaboration between the manufacturer and the supplier streamlines the review process.

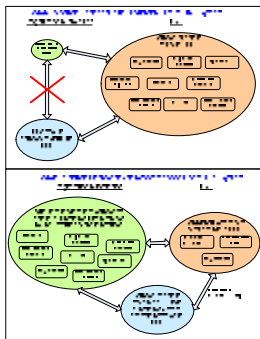


Figure 2. DMF Process

In mid-2007, the Working Group conducted a survey asking pharma and suppliers for their perspectives on the DMF process. The survey was sent to approximately 40 suppliers and CROs and 20 pharma companies. Results identified a number of benefits and drawbacks to the current system. Some examples include:

- Benefits**
- Allows DMF sponsor to share confidential information with regulators
  - Allows suppliers to understand FDA perspectives and apply these to development of new products
- Drawbacks**
- Not possible to evaluate DMF information prior to review of NDA
  - The process establishes indirect communication between FDA, the supplier, and the NDA sponsor
  - Filing, updating and general administrative aspects of process are burdensome (electronic filing could improve this).

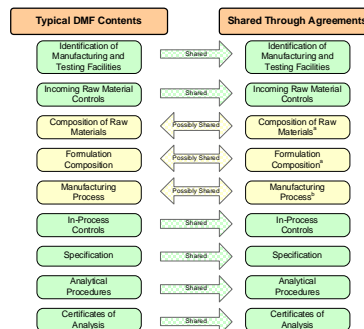
### Quality Agreements can Complement DMFs to Encourage Sharing of Information

Through the quality agreement, pharma and suppliers can work out together the types of information that could be shared. Sensitive information that is important for pharma and suppliers to share would be subject to confidentiality agreements as detailed in the quality agreement.

The agreement should work to:

- Increase communication and strengthen the partnership between pharma and supplier and therefore
- Decrease the amount and type of strictly confidential information that would go into the DMF, and which would not be shared with customers.

### Increased Communication & Sharing of Component Information



\* Depending on the formulation and business agreement this information may be shared qualitatively and/or quantitatively.  
 † Specific portions of the Manufacturing Process may be trade secrets and therefore kept in DMF, but the rest of the process should be shared.

## TOOLS FOR HELPING COMPANIES DEVELOP SOUND QUALITY SYSTEMS

In response to requests from suppliers, the Working Group is developing a toolkit to help the industry address issues such as change and risk management and quality agreements

The Group has drafted a **quality agreement "template,"** which would be part of this toolkit and which:

- Highlights GMP requirements as described in 21CFR 211 and the IPAC-RS guideline
- Provides general guidance on details to include in an agreement
- Includes technical agreement considerations

The Group is developing a framework to guide creation of the toolkit. It is envisioned that this toolkit would reference the IPAC-RS Guideline and other relevant guidelines and standards, and will be shared with any interested companies in the supply chain.

## SUMMARY

- The IPAC-RS Supplier QC Working Group developed a GMP guideline for suppliers of OINDP container closure system and device components
- The Guideline encourages communication between supplier and pharma, and use of tools such as quality agreements to enhance such communication
- Quality agreements can complement DMFs to establish more open sharing of information between suppliers and pharma

## NEXT STEPS

- The Working Group is developing tools such as Quality Agreement templates to help suppliers and pharma improve their quality systems
- The Working Group is exploring ways to transition the Guideline into a Standard

## ACKNOWLEDGEMENTS

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### References

1. *Good Manufacturing Practices Guideline for Suppliers of Components for Orally Inhaled and Nasal Drug Products*. IPAC-RS, 2006
  2. *PS 9000:2001, Pharmaceutical Packaging Materials*. Institute of Quality Assurance (IOA), Pharmaceutical Quality Group (PQG), 2001
- The Guideline can be ordered at: <http://www.ipac-rs.com/publications.htm>

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