South African Health Products
Regulatory Authority
Building A
Loftus Park
Arcadia
Pretoria

18 September 2022

GUIDELINE ON HOW TO RESPOND TO A GMP, GWP, GCP OR GVP INSPECTION REPORT

This guideline is intended to provide guidance to the applicants responding to the inspection report following a GMP, GWP, GCP or GVP inspection at their site. It is not intended as an exclusive approach leaflet and should not be taken as a complete or authoritative statement of the law. SAHPRA reserves the right to request any additional information to establish the safety, quality and efficacy of a medicine or medical device in keeping with the knowledge current at the time of evaluation. The SAHPRA is committed to ensure that all registered medicines or medical devices will be of the required quality, safety and efficacy and that the manufacturer/ wholesaler/ clinical trial site complies with acceptable quality assurance principles and good manufacturing/ wholesaling /clinical practices as determined by SAHPRA to manufacture, import or export, wholesale or conduct clinical trials. It is important that applicants adhere to the administrative requirements to avoid delays in the processing and evaluation of applications.

The guidance in this Guidelines and application forms are available from the office of the CEO: SAHPRA and the website.

Document History

Final Version	Reason for Amendment	Effective Date
1	First publication for implementation	November 2019
2	• Content structured on the latest SAHPRA Guideline Template • Old document number 4.11 changed to SAHPGL-INSP-05	September 2022

DR BOITUMELO SEMETE-MAKOKOTLELA
CHIEF EXECUTIVE OFFICER

Contents

Document History..... 1

Glossary..... 3

1. INTRODUCTION..... 4

1.1 Purpose..... 4

1.2 Scope..... 4

2. LEGAL PROVISION..... 5

3. GUIDELINES ON HOW TO RESPOND TO RESPOND TO AN INSPECTION REPORT..... 5

4. REFERENCES..... 6

5. VALIDITY..... 6

6. APPENDICES..... 7

6.1 Appendix A: Inspection Response Table Format..... 7

Glossary

Term	Meaning
Corrective action	An action to eliminate the cause of a detected deficiency or nonconformity or other undesirable situation.
Correction	An action to eliminate a detected deficiency or nonconformity.
Note: There is a distinction between corrective action and correction. Corrective actions are made against an identified root cause, whereas corrections are made against individual examples of a core issue. A correction can be, for example, rework or re-grade. There can be more than one root cause for any deficiency or non-conformity. A correction can be made in conjunction with a corrective action.	
Deficiency	Non-fulfilment of a requirement according to a relevant standard
Nonconformity	Non-fulfilment of a requirement
Supportive / Objective evidence	Data supporting the existence or verity of something.
Note: Objective evidence may be obtained through observation, measurement, test, or other means.	
Preventive action	An action to eliminate the cause of a potential deficiency or nonconformity or other undesirable potential situation.
Recurring deficiency or non-conformity	A deficiency or nonconformity that was also identified at a previous inspection, for which apparently the corrective and preventative actions taken earlier were inadequate.
Root Cause Analysis	A method of problem solving that tries to identify the root causes of faults or problems. A root cause is a cause that, once removed from the problem fault sequence, prevents the final undesirable event from recurring.

1. INTRODUCTION

The South African Health Products Regulatory Authority (SAHPRA) regulates medicines, scheduled substances and medical devices for human and animal use, in accordance with the provisions of the Medicines and Related Substances Act, 1965 (Act 101 of 1965) and the relevant Regulations made there under. (Hereafter referred to as the Act or the Medicines Act).

The Directorate: Inspectorate and Regulatory Compliance performs regular and repeated inspection of manufacturing sites, wholesalers and clinical trial sites, both in South Africa and in countries with which SAHPRA does not have a Mutual Recognition Agreement, or whenever SAHPRA requires an inspection to be conducted. This office is responsible for assessing compliance with Good Manufacturing/Wholesaling/Clinical Practice standards of applicants. Inspection enables the Inspectorate to confirm that license holders are complying with the conditions of their license, with the provisions of the Medicines Act and with current Good Manufacturing/Wholesaling/Clinical/Pharmacovigilance Practice (cGMP/ cGWP /cGCP/cGVP).

Amongst other things, Inspectors are empowered in Section 28 of the Act to:

(a) Enter any place or premises from which
- the holder of a license to manufacture, import or export conducts business.
- The holder of a certificate of registration of a medicine conducts business.

(b) Inspect the premises used in the manufacture, packing, testing, storage and distribution of medicinal products and inspect any documentation or records relating to the manufacture, packing, storage and distribution of medicinal products

(c) Take samples

(d) Seize any book, record, documentation or medicine or scheduled substances.

It is required by legislation that license holders shall make their premises available for inspection by the Inspectorate at any reasonable time.

Following an inspection, the Inspector(s) prepares a report of his/her findings. A full inspection report is then sent to the license applicant or holder noting any deficiencies found and asking for proposals to remedy them. In the event of serious non-compliance with GMP, GWP, GCP or GVP, the report is referred to the CEO of SAHPRA for formal action, which can include the refusal, suspension or revoking of a license, or part of a license.

1.1 Purpose

This guideline describes the process to be followed when the inspected companies compile and submit the inspection response to the inspectorate following a GMP/GWP/GCP/GVP inspection.

1.2 Scope

This guideline applies to all responses to the Inspection report by applicants following a GMP, GWP, GCP or GVP inspection at their site.

2. LEGAL PROVISION

This guideline was prepared with reference to Section 2A, 2B(1)(e), 26, 28 AND Regulation 23(3) of the Medicines and Related Substances Act, 1965 (Act 101 of 1965).

3. GUIDELINES ON HOW TO RESPOND TO RESPOND TO AN INSPECTION REPORT

3.1 The company that is being inspected should note that it is not possible in an inspection with a limited period to identify every area requiring attention.

3.2 The inspected company is encouraged to focus on the root of the causes of the deficiencies identified in this report with the view to strengthening the Quality Assurance system and to use its own internal audit program to monitor ongoing compliance with GMP, GWP, GCP or GVP.

3.3 The inspection response should follow the numbering system used in the deficiency list of inspection report (Part 4). The Company or applicant should not alter the numbering in the inspection report.

3.4 The company should provide a summary report of the inspection report on an official company's letter head that is signed and dated by the authorized persons.

3.5 The summary report should focus on the deficiencies listed in the inspection report and should not be used to evaluate the inspectors or the inspection.

3.6 The company is required to respond to the inspection report using the attached template (Appendix A).

3.7 The template (Appendix A) provided should not be submitted in an excel format. *Word* and PDF format of the template will be accepted in order for inspectors to add in comments on CAPAs.

3.8 The Company is required to address all deficiencies, to submit supportive documentation as proof of correction of each deficiency, and / or a proposed time schedule for corrections to be implemented.

3.9 An inspection response without relevant supportive documentation and root cause assessment reports will not be evaluated or accepted by the Inspectorate.

3.10 The inspection response should be submitted in an electronic format (CD or USB flash drive). A statement, declaring that this external electronic storage device is virus free, must be submitted with the response. The CD or USB flash drive must be clearly labelled, noting the *Name of the company; Date of submission; Type of document submitted (Response 1 or 2 to inspection report)*

3.11 The Company should submit the inspection response within 30 calendar days from the date the report is received by the company.

3.12 The company may request an extension to the timeline of submitting the response - in writing- to the relevant inspector(s).

3.13 The Company requesting an extension to the timeline for the inspection response should ensure that an extension is provided by the relevant inspector(s) in writing prior to continuing delaying the submission of the response.

3.14 The GMP/GWP/GCP/GVP reference number recorded in the inspection report should be used

at all times by the company to ensure traceability of the process and any queries related to the inspection report.

3.15 The inspection response should be accompanied by the relevant valid proof of payment for the inspection.

3.16 If there is a dispute regarding the inspection fee that has been charged for an inspection, the company should address this matter with the relevant inspector(s), prior to the submission of the response

3.17 The inspector(s) should be contacted on the relevant contact number(s) or e-mail address submitted with the inspection report.

3.18 The inspection response that does not follow this guideline will not be evaluated and will be rejected by the Inspectorate.

4. REFERENCES

The following related documents are referenced:

4.1 PIC/s guidelines

5. VALIDITY

This guideline is valid for a period of 5 years from the effective date of revision and replaces guidelines on How to respond to a GMP, GWP or GCP inspection report, old document number 4.11. It will be reviewed on this timeframe or as and when required.

6. APPENDICES

6.1 Appendix A: Inspection Response Table Format

To be submitted on the Company's letterhead

No.	Deficiency	Root Cause	CAPA	Supportive documents / Attachments	Proposed timelines	SAHPRA Inspectorate remarks	Response acceptable Yes/No
1.							
2.							
3.							
4.							
5.							
6.							