DBA

The Journal of David Begg Associates

Issue 12 Spring 2009

DBA Analytical

The latest on EU variations legislation

Supply Chain Assurance

The greatest challenge facing our industry

An NSF International Company

DBA-global.com

welcome

Bob Pietrowski, Managing Partner David Begg Associates

Our largest Journal to date…

You may notice that this edition of the DBA Journal is significantly thicker than previous ones. There are a number of reasons for this…

Increased Regulatory Activity

The Industry News section of this Journal is much larger than usual, and we could have included much more. In recent months there has been a flurry of regulatory activity on both sides of the Atlantic – much of it to do with supply chain assurance and anti-counterfeiting measures. These really are two of the major quality issues facing our industry today and in Tech Talk, Neil Wilkinson provides a useful overview of current initiatives to curb the problem.

Our Continued Expansion in the US

We are committed to building a business in the US which provides the same comprehensive service of high quality training, auditing and consultancy as that on offer in Europe. We are growing slowly but carefully – ensuring that we take on only those consultants who can offer the very best advice and training to our North American clients. They demand the best and we are determined to provide the best!

You will see that we have added two more consultants to DBA USA – John Lyall and Len Mestrandrea. John is a veteran auditor, having helped Pfizer plants around the world to prepare for FDA and EU inspections. We are confident that his experience will help you too. Len is a vastly experienced pharmaceutical microbiologist with expert knowledge of international regulatory expectations for sterile products manufacture.

Finally, we are delighted to be able to offer contract analytical services through our newest member of the DBA family, DBA Analytical. This is an exciting venture for us and we are determined to extend our range of laboratory services in the coming months.

Our unique program of pharmaceutical professional development, "Quality Leadership", continues to gain momentum and interest within the industry. In this Journal we give you more information on the training and the full series of modules.

Bob Pietrowski
Managing Partner

DBA The Pharmaceutical Training Specialists

Tech Talk

Challenges to Pharmaceutical Supply Chain Assurance

If you are not yet aware of what is keeping key pharmaceutical industry personnel and regulators awake at night, then read this article by our Neil Wilkinson!

As relentless economic pressures have contrived to drive business needs for increased globalisation and efficiency a 'new' hot topic has recently arisen to the pharmaceutical industry forefront – 'end to end supply chain assurance'.

This topic encompasses both the supply chain for pharmaceutical ingredients (e.g. active ingredients, excipients, packaging materials) coming into our operations, and also the supply chain for finished medicinal products leaving our site en-route to the customer, and ultimately the patient.

Over the past year, both ends of the supply chain have received massive publicity, particularly in the USA, as a result of a number of significant and tragic public health issues.

Sadly, some of these issues have occurred on more than one occasion in the past, and it is now time for the pharmaceutical industry and its key stakeholders, including the regulatory agencies, to work together to take actions to mitigate the risks of such issues happening again.

We have seen recently further incidents relating to the use of adulterated pharmaceutical ingredients, often due to criminal, economically driven activities and compounded by complex supply chains with inadequate controls. These have included:

- Glycerin: A pharmaceutical excipient contaminated with diethylene glycol (antifreeze). There have been several such incidents – since 1937 until the present day – resulting in hundreds of patient deaths in the USA, Haiti, Panama and, most recently, infants in Nigeria.
- Heparin: A pharmaceutical active agent contaminated with over-sulphated chondroitin (a synthetically produced cheaper material) resulting in 12 countries having affected products, with over 200 deaths in the USA in 2008. Dr Janet Woodcock from FDA indicated that this has to be our wake-up call.
- Falsified medicinal products: There has been a significant growth of falsified finished medicinal products (including illegal counterfeits) in many countries over the past few years.

The criminal fraternity has recognised that there are rich gains to be made from trade in pharmaceuticals, as other areas of their 'business' are made more difficult.

The products being counterfeited now go well beyond the 'lifestyle' drugs originally seen, with many lifesaving medicines being targeted. Many of these are also now penetrating into the legal supply and distribution channels. These materials often contain incorrect quantities and/or substandard ingredients.

So – we have a significant and increasing problem to confront.

In the USA there has been very high profile publicity, particularly around the Heparin issues, and the politicians have been quick to

propose new legislation, whilst criticising the FDA's lack of enforcement.

In Europe, the European Commission has also been active in proposing new Directives to improve the situation.

However, one key fact remains – it is the pharmaceutical company that determines its end to end supply chains and therefore the primary responsibility for assuring its integrity, robustness and safety lies firmly with the pharmaceutical company, **not** with the regulators.

The regulatory climate in this area is certain to change over the next year or so.

From the USA we have:

- Import Safety Action Plan (wider than just pharmaceuticals)
- Increased FDA permanent overseas presence in selected locations ('beyond our borders') and international collaboration activities
- Ingredient 'pedigree' proposals
- Proposed FDA Globalisation Act 2008 – which includes significant and far-reaching changes

From the EU we have:

- Proposals for a Directive on Falsified Medicinal Products (to amend 2001/83/EC)
  - ➢ Product 'safety' features to allow verification of authenticity, pack identification, tampering
  - ➢ 'Actors' in the supply chain – enhance GDP measures for wholesalers and traders, GDP database establishment
  - ➢ APIs – strengthening of processes to assure GMP of APIs used in EU medicinal products

From the WHO we have the IMPACT anti-counterfeiting initiatives

In response to the problem, industry has recognised that it cannot afford to just wait for future legislation – there are potentially significant patient risks and doing nothing is not an option – we must act **now**.

The Pharmaceutical Industry must also look outside its own boundaries to see what tools and technologies are used by other industries; e.g. Traceability used by shipping companies such as FedEx. We must improve our traceability of materials throughout the supply chain. Here we should focus on learning from other industries that already excel in this area, and rapidly and efficiently

adopt those systems. We need to understand the pedigree of our ingredients and our product and strive towards a simple, clear, effective and harmonized system to capture the information.

Industry has begun to take a proactive approach to seeking solutions to improving supply chain assurance, both at the individual company levels and through a series of workshops in the US, EU and China (planned) organised by PDA, that have brought together most of the key stakeholders in this area:

- PhRMA and EFPIA – representing the R&D based industry
- EGA – representing the generics industry
- FDA, EC, EMEA – representing the regulators
- EAEPC – representing the parallel traders
- IPEC – the International Pharmaceutical Excipients Council
- APIC – the European API industry
- QP Association – representing QPs

This is 'work in progress', but all participants shared the common aim of 'creating global quality and regulatory systems that assure patient safety by guaranteeing product quality and authenticity throughout the supply chain'. All the attendees representing the various sectors of industry were in agreement – we must act now to assure the integrity of our pharmaceutical supply chain. A common theme heard from speakers and participants alike, was one of partnership-partnership across industry, with other areas of industry; partnership with regulators and amongst regulators, and a call to address this situation in a globally harmonized fashion.

Already a tangible output has been an agreement that accredited third party audit schemes, using defined standards for API and excipients, have a role to play in the future. There is a danger that with the increased focus on the supply chain the degree of auditing will explode even further to the point of 'paralysis by audit', so the hope is that accreditation schemes and/or approaches for sharing of audits, in parallel with the effective use of Quality Risk Management, will be more effective, without reducing patient protection.

There are many in the industry who will say that *"I've heard all this before – accreditation schemes and sharing of audits – it will never work, the lawyers and the regulators won't allow it"* – well, now there is a greater desire than ever before to challenge the perceived 'blockers'.

A clear message was heard regarding expectations for auditing. It is clear that companies are expected to have auditing information for all of their suppliers, and to ensure that the suppliers they use also have audit programmes for their suppliers. It was also clear that there is no expectation that a company must perform all the auditing themselves, and the use of qualified 3rd party auditing is acceptable both to industry and regulators. Industry was also in firm agreement that we cannot solely rely on paper audits or questionnaires. A key point is that simply having audits on file and a technical agreement in place may not be enough – the ongoing relationship with the supplier and associated supply chain controls are key.

Also many companies are signing up to the 'Rx-360 Consortium' as a means of taking this forward. The mission of Rx-360 is to create and monitor a global quality system that meets the expectations of industry and regulators that assures patient safety by enhancing product quality and authenticity throughout the supply chain. The group is set up as an international non-profit organization including pharmaceutical manufacturers and supplier companies, as well as trade organizations (as observers).

The group has identified four distinct functions:

1. Standard Setting
2. Technology Development
3. Market Surveillance
4. Shared Supplier Audits

For more information: www.rx-360.org

Remember, there is NO single 'Magic Bullet' solution to Supply Chain Assurance. It needs a holistic approach across multiple areas.

DBA will be running two key courses on this vitally important topic later this year…

'Supply Chain Assurance'
Tuesday 30 June to Wednesday 1 July 2009
London Marriott Hotel, Kensington, London

Neil Wilkinson and colleagues will give you the latest news on industry and regulatory initiatives and what you should be doing.

'Anti-Counterfeiting Measures: Implications for Quality Professionals and QPs'
Thursday 1 October 2009
London Marriott Hotel, Kensington, London

Gary Rees, who led a team on anti-counterfeiting for Wyeth before joining DBA, will cover all aspects of the topic and reinforce the key responsibilities of Quality Professionals and, in particular, the Qualified Person.

Forthcoming Courses

What's planned for the next few months to mid October

Contamination Control for Non-Sterile Production

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

12-14 May 2009

This course will provide you with practical advice on how to design, maintain, operate, clean and monitor manufacturing facilities, equipment and utilities to minimise the potential for physical, chemical and microbiological contamination of non-sterile dosage forms by application of a risk-based approach. We will help you to add quality, not just add cost!

Course Fee: **£1690.00 plus VAT** (First booking)
£1352.00 plus VAT (Additional bookings)

EU GMP and Inspection Readiness

Renaissance Washington, DC Hotel, Washington, USA

12-14 May 2009

We will explain to you the key differences between US cGMP regulations and EU GMP requirements and provide you with clear advice on how to prepare for an EU inspection, how to manage the inspection to a successful conclusion and how to respond to any inspectional findings.

Course Fee: **$2675.00** (First booking)
$2140.00 (Additional bookings)

Human Error: Causes and Prevention

Hilton Manchester Deansgate Hotel, Manchester, UK

12-14 May 2009

Human error is a commonly quoted cause of problems and deviations in our industry, but often it is not the real reason – just a convenient excuse – and corrective actions such as 'retraining' are doomed to failure. You know this and so do the regulators! This unique course will help you see beyond 'human error' as the root cause of problems. We will show you why people make mistakes and provide you with practical methods to reduce errors in the workplace.

Course Fee: **£1690.00 plus VAT** (First booking)
£1352.00 plus VAT (Additional bookings)

Engineering Aspects of GMP

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

18-21 May 2009

This highly popular course is designed to provide engineering staff with the knowledge to apply GMP principles to their work and to provide QA staff with an understanding of the special challenges faced by engineering staff.

Course Fee: **£2210.00 plus VAT** (First booking)
£1768.00 plus VAT (Additional bookings)

Satisfying EU GMP Requirements for Sterile Products Manufacture

San Juan Marriott Resort & Stellaris Casino, San Juan, Puerto Rico

19-21 May 2009

Current EU GMP requirements for sterile products manufacture are the most stringent and probably the most confusing on the planet! We will explain the GMP regulations to you, describe the rationale behind them, and advise you on how to comply with them in a pragmatic and cost-effective way.

Course Fee: **$2675.00** (First booking)
$2140.00 (Additional bookings)

Preparing for the Future: Successful Implementation of ICH Q8, 9 and 10

NEW COURSE

London Marriott Hotel Kensington, London, UK

2-4 June 2009

The development of ICHQ8/Q8R (Pharmaceutical Development), Q9 (Quality Risk Management) and Q10 (Pharmaceutical Quality System) has set the route map for pharmaceutical quality management into the future. This course will explain why these guidelines are so important and provide you with practical advice on how best to implement them to achieve maximum benefit. Expert speakers from industry and regulators will present their views and provide you with their experiences with implementation.

Course Fee: **£1690.00 plus VAT** (First booking)
£1352.00 plus VAT (Additional bookings)

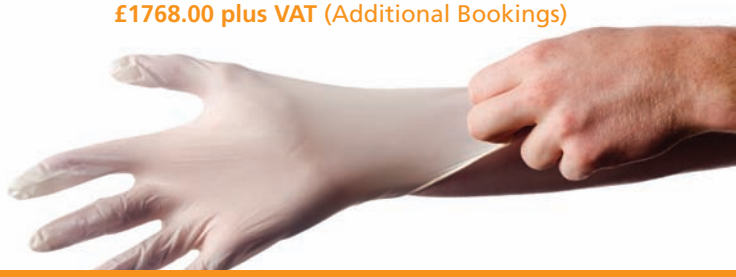
Effective Pharmaceutical Audits and Self-Inspections

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

8-11 June 2009

Learn how to carry out audits with skill and sensitivity, whilst ensuring that you do not overlook important issues. This course will help you to make your audits really value adding. Plus, have the opportunity to become a DBA certified auditor.

Course Fee: **£2210.00 plus VAT** (First Booking)
£1768.00 plus VAT (Additional Bookings)



Book online at www.DBA-global.com

Course details and prices are correct at the time of printing and are published in good faith. DBA reserves the right to make any change which may become necessary.

DBA The Pharmaceutical Training Specialists

Key Topics in Sterile Products Manufacture: A Practical Interpretation of Annex 1

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

15 June 2009

A short course designed to bring you up to date with the latest requirements of Annex 1 of the EU GMP Guide and, more importantly, how to comply in a practical, cost-effective way.

Course Fee: **£675.00 plus VAT** (First booking)
£540.00 plus VAT (Additional bookings)

Environmental Monitoring for Sterile Products Manufacture

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

16-17 June 2009

This course is designed to help you understand the methodologies of environmental monitoring, how to use them to design a comprehensive, targeted monitoring programme and how to act on the results to assure real control.

Course Fee: **£1280.00 plus VAT** (First booking)
£1024.00 plus VAT (Additional bookings)

Process Simulations

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

18 June 2009

A short course designed to ensure that your process simulations (broth fills) comply with current EU and US requirements. We will also tell you how to deal with problems arising from process simulations.

Course Fee: **£675.00 plus VAT** (First booking)
£540.00 plus VAT (Additional bookings)

Active Pharmaceutical Ingredients

Qualified Person & Professional Development Training

Maryborough Hotel & Spa, Cork, Ireland

22-25 June 2009

This course will provide you with all you need to know about the application of GMP to the manufacture and control of APIs and bulk biologicals. The course includes visits to a state of the art API manufacturer and one of the largest biotech plants in Europe.

Course Fee: **£2524.00** (First booking)
£2019.20 (Additional bookings)

Pharmaceutical Packaging GMP

Hilton Manchester Deansgate Hotel, Manchester, UK

23-25 June 2009

Key EU and US GMP requirements for pharmaceutical packing operations, including up to the minute developments in security systems and ISO GMP expectations for primary packaging components.

Course Fee: **£1690.00 plus VAT** (First booking)
£1352.00 plus VAT (Additional bookings)

Effective Training: How to Improve Business Performance

achieve

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

23-25 June 2009

Not just a training course, but a partnership between DBA and you to ensure that your training programmes deliver real benefit to your staff, your company and your patients. There is nothing else like this – don't miss out!

Course Fee: **£1690.00 plus VAT** (First booking)
£1352.00 plus VAT (Additional bookings)

Supply Chain Assurance

NEW COURSE

London Marriott Hotel Kensington, London, UK

30 June – 1 July 2009

The hottest topic in pharmaceutical quality management right now! Come and learn about the international initiatives to assure the integrity of the supply chain and how these initiatives will impact upon Quality Leaders, Qualified Persons, Auditors, Quality Control staff, Purchasing staff and all others connected with the supply of medicines to the patient. The lead tutor, Neil Wilkinson, is widely regarded as one of the few industry experts in this field.

Course Fee: **£1280.00 plus VAT** (First Booking)
£1024.00 plus VAT (Additional Bookings)

Get in touch now to book your place on any of these courses

Call us on: +44 (0) 1751 432 999 or email: courses@DBA-global.com

Forthcoming Courses

What's planned for the next few months to mid October

EU Requirements for Clinical Trials

Crowne Plaza Hotel Philadelphia Center City, PA

14-16 July 2009

An outstanding success when held for the first time in San Francisco in April. We will describe to you the European regulatory framework for clinical trials and explain why EU GMP requirements for the manufacture of clinical supplies are the strictest in the world. But don't worry, we will also explain how to comply with these requirements. If you currently manufacture supplies for clinical trials in Europe, or if you intend to in the future, you should not miss this course.

Course Fee: **$2675.00** (First Booking)
$2140.00 (Additional Bookings)

Role & Professional Duties of the Qualified Person

Qualified Person & Professional Development Training

York Marriott Hotel, York, UK

20-22 July 2009

This course provides essential guidance, not just on the legal duties of the Qualified Person, but also on how the QP should organise themselves, their colleagues and the quality system to ensure that they fulfil their duties with skill and professionalism. Includes a review of the UK QP assessment process and a simulated QP assessment interview.

Course Fee: **£1863.00 plus VAT** (First Booking)
£1490.40 plus VAT (Additional Bookings)

Preparing for the Future: Successful Implementation of ICH Q8, 9 and 10

Crowne Plaza Hotel Philadelphia Center City, PA

18-20 August 2009

The widespread adoption of ICH Q8 (Pharmaceutical Development), Q9 (Quality Risk Management) and Q10 (Pharmaceutical Quality System) promises to bring about the greatest step forward in pharmaceutical quality management since the introduction of GMP – but only if companies have a coherent and well executed policy for their implementation into existing activities! This three day course, run by tutors who were instrumental in writing these guidance documents, will provide you with sound advice on how best to implement these initiatives. You will also hear from industry speakers about how their companies are benefitting from implementation.

Course Fee: **$2675.00** (First Booking)
$2140.00 (Additional Bookings)

Mathematics & Statistics

Qualified Person & Professional Development Training

York Marriott Hotel, York, UK

14-17 September 2009

Perhaps the only statistics course aimed directly at the pharmaceutical industry! Given the increasing importance of PAT, QbD, trending of in-process data and analysis of data for product reviews, all pharmaceutical professionals need to ensure that their understanding of and ability to use statistical routines is well developed.

Course Fee: **£2524.00 plus VAT** (First Booking)
£2019.20 plus VAT (Additional Bookings)

Free Seminar for Prospective QP Trainees

FREE SEMINAR

York Marriott Hotel, York, UK

15 September 2009

Interested in becoming a Qualified Person? Why not attend this free seminar to find out more about what we can offer? Learn about what is required to become a QP and see one of our training modules in action.

Qualified Person Sponsor Seminar

FREE SEMINAR

York Marriott Hotel, York, UK

16 September 2009

Are you currently acting as a sponsor for someone undergoing QP training or are you likely to be in the future? This free seminar, hosted by DBA and including presentations from the Royal Pharmaceutical Society of Great Britain, the Royal Society of Chemistry and the Institute of Biology, is designed to help you understand the professional and ethical responsibilities that go with the sponsor role so that you can better fulfil your duties and better support your trainee QPs.

Pharmaceutical GMP

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

21-24 September 2009

Europe's most popular GMP course! An excellent overview of EU and US GMP regulations, plus up to the minute guidance on the latest "hot topics".

Course Fee: **£2210.00 plus VAT** (First Booking)
£1768.00 plus VAT (Additional Bookings)

Book online at www.DBA-global.com

Course details and prices are correct at the time of printing and are published in good faith. DBA reserves the right to make any change which may become necessary.

DBA The Pharmaceutical Training Specialists

Sterile Products Manufacture

Manchester Marriott Victoria & Albert Hotel, Manchester, UK

28 September – 1 October 2009

One of our most popular courses. A comprehensive, four day course on the latest EU and US GMP requirements for sterile products manufacture, plus practical advice on how to ensure compliance in a cost-effective and scientifically sound way.

Course Fee: **£2210.00 plus VAT** (First Booking)
£1768.00 plus VAT (Additional Bookings)

Practical Aspects of Controlled Temperature Storage and Distribution

NEW COURSE

London Marriott Hotel Kensington, London, UK

28-30 September 2009

An intensive three day course designed to help you to understand current EU and FDA requirements for the design, qualification, validation and ongoing control of all systems associated with controlled temperature storage and shipment of pharmaceuticals, from manufacture to the patient.

Course Fee: **£1690.00 plus VAT** (First Booking)
£1352.00 pus VAT (Additional Bookings)

Anti-Counterfeiting Measures: Implications for Quality Professionals and QPs

NEW COURSE

London Marriott Hotel Kensington, London, UK

1 October 2009

Counterfeit medicines represent perhaps the biggest current threat to patient safety and company reputation. That is why the regulators are so active in preparing legislation on the topic and companies are putting in place anti-counterfeiting measures. As with all issues which impact patient safety, there are significant implications for the quality system, quality professionals and, in particular, the Qualified Person. This one day seminar will discuss those implications and provide advice to those who are impacted by the growing body of legislation and guidance.

Course Fee: **£675.00 plus VAT** (First Booking)
£540.00 plus VAT (Additional Bookings)

Linking Pharmaceutical Quality and Pharmacovigilance Systems

NEW COURSE

London Marriott Hotel Kensington, London, UK

2 October 2009

Recent legislation and guidelines on pharmacovigilance places clear responsibilities on the Quality function, and the Qualified Person, and not just upon the Clinical professionals within pharmaceutical companies. This one day seminar will explore the role of Quality staff and QPs in ensuring that pharmacovigilance systems are effective and meeting the full requirements of the regulators.

Course Fee: **£675.00 plus VAT** (First Booking)
£540.00 plus VAT (Additional Bookings)

Pharmaceutical Law

Quality Leadership Program

Royal Sonesta Hotel, Boston, MA

5-7 October 2009

NEW COURSE

The launch of our ground-breaking Quality Leadership Program in the USA. This first module covers all aspects of US, EU and international pharmaceutical legislation and its impact on Quality Leaders and Pharmaceutical Professionals. Not to be missed!

Course Fee: **$2700.00** (First Booking)
$2160.00 (Additional Bookings)

Get in touch now to book your place on any of these courses
Call us on: +44 (0) 1751 432 999 or email: courses@DBA-global.com

Industry News

EU NEWS

NEW VARIATIONS GUIDANCE

The Commission has published draft versions of guidance documents on the new variations procedures which are under consultation until 18th May.

Implementation of the Variations Regulation
Public Consultation Paper for the preparation of guidelines on the operation of the variation procedures.

Implementation of the Variations Regulation
Public Consultation Paper for the preparation of guidelines on the details of the various categories of variations.

The first draft guideline outlines the procedures to be followed when handling all types of variations, and when using the worksharing procedure. It applies to all products, whether approved through the MRP, DCP or centralised approval systems.

For worksharing, the draft guideline says that where at least one of the marketing authorisations has been granted via the centralised procedure, the EMEA will be the reference authority. Companies planning to submit variations under the worksharing procedure should inform the EMEA or the CMD three to six months before submission, explaining why such a procedure is suitable.

The second guideline clarifies the classification of variations into the following categories:

- minor variation of Type IA: one that has only a minimal impact, or no impact at all, on the quality, safety or efficacy of the medicinal product concerned. The new regulation classifies these variations into two subgroups: Type IA variations that should be notified within 12 months following implementation; and Type IA(IN) variations that for the purposes of continuous supervision should be notified immediately after implementation, and
- major variation of Type II: a variation that is not an extension and that may have a significant impact on the quality, safety or efficacy of the medicinal product concerned. These must be approved before implementation.

In addition, the regulation states that variations that are not explicitly recognised as Type IA, Type II or extensions are handled, by default, as Type IB variations (and no longer as Type II).

The guideline also has an annex containing a list of variations that should be classified as Type IA or Type II on the basis of definitions and specific examples; a (non-exhaustive) list of examples that may usually be considered as Type IB; and some guidance on the scientific conditions to be fulfilled and the supporting documentation required regarding certain variations.

The content of these documents and their implications will be discussed in detail during our five day training course, "Pharmaceutical Law & Administration", to be held in York from 19-23 October, our four day course with RRG entitled "Quality Aspects of the CTD", to be held in York from 23-26 November and our one day "Pharmaceutical Legislation Update", seminar to be held in Manchester on 28 October.

ANTI-COUNTERFEITING PROPOSALS

On 10 December 2008 the Commission issued a draft revision to Directive 2001/83/EC to implement changes to protect EU citizens from counterfeit medicines. The amendments proposed include:

- Certain obligations for parties, other than wholesale distributors, who act in the distribution chain. These parties are typically involved in the transactions without actually handling the products (for example by auctioning or brokering products, cf. Article 1(14) of the proposed amending Directive).
- Providing a legal basis for the Commission to render obligatory specific safety features (such as a serialisation number or a seal) on the packaging of prescription medicines (Article 1(8) of the proposed amending Directive).
- The addition of a new legal duty for Qualified Persons:

  "In the case of products intended to be placed on the market in the Community, that the safety features referred to in point (o) of Article 54 have been affixed on the packaging."

- A prohibition, in principle, of the manipulation (i.e. removing, tampering with, or over-labelling) of safety features on the packaging by actors situated 'in-between' the original manufacturer and the last actor in the distribution chain (typically the pharmacist) or end user (doctor/patient). However, these safety features may be removed by Manufacturing Authorisation holders if they check the authenticity of the product before doing so and they replace *"the safety feature with a safety feature which is equivalent as regards the possibility to ascertain identification, authenticity and uninterrupted traceability of the medicinal product, and without opening the immediate packaging…"* This then allows parallel importing to continue.
- Obligatory audits of supplying wholesale distributors of medicinal products in order to ensure reliability of business partners (Article 1(13) of the proposed amending Directive). Where product is traded between wholesalers *"holders of the wholesale distribution authorisation must verify compliance with good distribution practices of the supplying wholesale distributor either by themselves or through a body accredited for that purpose by the competent authority of a Member State."* and *"where product is obtained from the manufacturer or importer, holders of the wholesale distribution authorisation must verify that the manufacturer or importer holds a manufacturing authorisation."*
- Strengthened requirements for imports of API from third countries if it could not be established that the regulatory framework in the respective third country ensures a sufficient level of protection of human health for products exported to the EU (Article 1(4) of the proposed amending Directive).

  "Active substances used as starting material shall only be imported if:

  a) they have been manufactured by applying standards of good manufacturing practice at least equivalent to those laid down by the Community, and

  b) they are accompanied by a written confirmation from the exporting third country that the standards of good manufacturing practice applicable to the plant manufacturing the exported active substance are at least equivalent to those laid down by the Community, and that the plant is subject to control and enforcement ensuring that those good manufacturing practices cannot be circumvented."

  c) This requirement shall not apply if the exporting country is listed in accordance with Article 111b.

- Article 111b proposes that the Commission shall, following a request from a third country, list that country by way of a Decision if its regulatory framework for active substances exported to the Community and the respective control and enforcement ensure a protection of public health equivalent to that in the Community. Particular account shall be taken of:

  (a) The country's rules for good manufacturing practices.

  (b) The regularity of inspections of good manufacturing practices.

  (c) The efficacy of enforcement of good manufacturing practices.

  (d) The regularity and rapidity of information supplied by the third country relating to non-compliant producers of active ingredients.

- To require audits of manufacturers of API (Article 1(3) (a) of the proposed amending Directive) "the holder of the manufacturing authorisation shall verify compliance of the active substances manufacturer with good manufacturing practices by himself or through a body accredited for this purpose by the competent authority of a Member State."
- Strengthened rules for inspections including increased transparency of inspection results through publication in the EudraGMP database managed by the EMEA (Article 1(15) of the proposed amending Directive).

International regulations and expectations for anti-counterfeiting measures and their implications will be the subject of our new training course, "Anti-Counterfeiting Measures: Implications for Quality Professionals and QPs", to be held in London on 1 October.

Industry News

PHARMACOVIGILENCE PROPOSALS

On 10 December 2008 the Commission published proposals for amending Directive 2001/83/EC to strengthen the EU requirements for pharmacovigilance.

The proposals focus on but are not limited to:

- Maintaining the current split of competences between the Member States and the EMEA, while making clear the respective roles and responsibilities and minimising duplication of effort.
- Strengthening the rules on transparency relating to pharmacovigilance data, assessment and decision-making and involve stakeholders (e.g. patient and healthcare professional groups) in the processes including patient reporting.
- Establishing clear standards ('Good Vigilance Practices – GVP') for the conduct of pharmacovigilance by both the industry and regulators.
- Freeing up resource by rationalising and simplifying the reporting of suspected adverse drug reactions (ADRs), both expedited and periodic reporting, making best use of current information technology (including Eudravigilance) and matching the reporting requirements with the level of knowledge about the safety of a specific product. Stimulate innovation by establishing a clear legal requirement to conduct post-authorisation safety studies including those in risk management systems.

These proposals and their impact for Quality Professionals and Qualified Persons will be discussed in detail during our new one day seminar, "Linking Pharmaceutical Quality and Pharmacovigilance Systems", to be held in London on 2 October.

REVISED EU REFLECTION PAPER ON QUALIFIED PERSON DISCRETION

In February 2009 the EMEA issued a revised Reflection Paper that updates the one issued on this topic in 2006.

The 2006 and 2009 reflection papers both emphasise that:

- Any deviation/non-compliance, which may materially affect the safety or efficacy of a batch of product, or compromises the overall product quality, must result in a QP decision **not** to release that batch.
- Standard operating procedures and details on makes and models of equipment submitted with a Marketing Authorisation application are **not** considered as particulars that define the requirements of that Marketing Authorisation.
- Recurrent deviations from the manufacturing process and/or analytical control methods as approved in the Marketing Authorisation application dossier, even though judged minor, are changes and variations to the affected Marketing Authorisations are necessary.

Given these and other provisos, this paper then proposes that a batch of finished product can be considered to continue to meet the requirements of the Marketing Authorisation when:

1. The deviation is minor, one-off and unplanned in nature and relates only to the manufacturing process and/or the analytical control methods of either the starting materials or the medicinal product as described in the Marketing Authorisation or clinical trial application and has no influence on the result of analytical testing.
2. The active substance/antigen and finished product specifications as described in the Marketing Authorisation or clinical trial application are complied with.
3. An assessment is performed by the manufacturer using an appropriate approach such as described in ICH Q9, Quality Risk Management, to support a conclusion that the occurrence is a minor quality deviation that does not affect the safety and efficacy of the product.
4. The risk assessment should assess the need for inclusion of the affected batches in the ongoing stability programme as required by Chapter 6 of the GMP Guide.
5. The risk assessment for biological medicinal products should consider in particular that even minor changes to the process can have an unexpected impact on safety or efficacy.
6. The Quality Risk Management process is integrated into the manufacturer's quality assurance system, notably the documentation system established to comply with GMP, and records are available for inspection by the Competent Authorities.
7. Deviations must be properly recorded in the relevant batch documentation in accordance with GMP. All such deviations must be reviewed as part of the annual product quality review as required by Chapter 1 of the GMP Guide.

Trends or recurrences and other deviations from the details of the

Marketing Authorisation must be flagged as problems that require resolution with the Competent Authorities including, if necessary, the submission of variations. The proposed solution described above does not apply in these circumstances.

The 2006 Reflection Paper, and industry's responses to it, were discussed at a meeting, held at the EMEA in September 2007, between the EU Inspectors Working Party (IWP) and industry 'interested parties'. Prior to this meeting all of the industry 'interested parties' represented, had met and had agreed a common position. This common position was presented to the EMEA/IWP as follows:

The Reflection Paper was welcomed as a step forward.

The scope should be extended to include:

i. recurrent (i.e. common root cause) unplanned minor deviations due to:
   - an issue prior to implementation of corrective actions to address the first occurrence
   - an issue where an incorrect root cause and/or corrective action was initially assigned
   - pending approval of a submission to correct or alter the Marketing Authorisation once this has been submitted

ii. one-off 'Planned Deviations'.

iii. OOS deviations for attributes determined to be non-critical (i.e. have no impact on safety, quality or efficacy) following risk assessment.

There needs to be an agreed definition of what constitutes a 'minor' deviation.

The EMEA/IWP response was that they were 'sympathetic' to the points raised.

It is very disappointing, therefore, that none of the points raised by industry in September 2007 are addressed in this revision of the Reflection Paper. Indeed, one of the changes is to make it clear that 'Planned Deviations', which industry asked to be included within the scope of the Reflection Paper, are specifically excluded.

The 2009 Paper does state *"This Reflection Paper has been revised to take account of comments made and experience gained. It has been done to improve understanding based on feedback from industry and regulatory authorities. A number of comments from this feedback were received that cannot be taken forward at this time but may be addressed in the forthcoming revision of the Variations legislation."* So it is possible that some recurring deviations may be Type 1A Variations under the new system but this is not effective yet and the Guideline that lists the changes that will be Type 1A and Type II Variations has yet to be published.

So to summarise, the revised Reflection Paper has changed very little from the 2006 position, other than tightening up in some areas. It is likely that the significant differences in approach to the subject of the discretion QPs are permitted by individual Member State authorities will continue; with the UK and Ireland adopting the most dogmatic stance.

The new document (EMEA/INS/GMP/227075/2008) and its implications will be discussed during our three day training course, "The Role & Professional Duties of the Qualified Person", to be held in York from 20-22 July.

DRAFT ANNEX 14: HUMAN BLOOD AND PLASMA PRODUCTS

A draft revision to Annex 14 was issued in January 2009, with comments due by 31 July 2009.

This draft is a significant revision, incorporating relevant references to 2002/98/EC, 'The Blood Directive', 2005/62/EC (the standards and specifications extension to the blood directive) and 2005/61/EC (the extension to the blood directive on traceability and haemovigilance). The glossary to the annex also introduces, for the first time in the GMP Guide, some key concepts, notably:

1. Blood Establishment: body responsible for collecting blood or plasma
2. Plasma Master File: a stand-alone document setting out the characteristics of plasma used
3. Responsible Person: the blood establishment equivalent of the QP (note that, unlike the QP, the blood establishment RP releases individual components, not batches – effectively by parametric release)

The revised Annex 14 makes clear the respective responsibilities under GMP of the blood establishment RP and the fractionation plant QP, including the requirement for a contract of supply and for blood establishment audit by the QP. The Annex also reinforces the requirement for EU competent authority approval of non-EU blood establishments supplying plasma into the EU.

Industry News

UK NEWS

RISK-BASED inspections

Over the past three years, in the UK there have been significant developments in inspection risk management and the strategies of a number of regulators were reviewed by the MHRA.

It is considered that the scope, frequency and depth of inspections should be dependent on how the regulated organisation takes responsibility for compliance with the regulations. Whilst the company or organisation has always had legal responsibility for compliance, the notice of inspection has for some been a trigger for compliance assessment instead of a continuous compliance programme being in place.

Following a detailed review of risk-based inspection models used by a range of organisations, a draft model was designed to cover all GxP inspections, however, at implementation it is envisaged that there will be a different emphasis within the individual elements as appropriate to the different GxPs.

Good Manufacturing Practice (GMP) – Risk-Based Inspection Process – 6 March 2009

The GMP Risk-Based Inspection Process commenced for all participating sites on 1 April 2009. Participating sites are those UK sites that hold a Manufacturing Authorization (MIA, MS, MIA (IMP)) and 3rd Country sites that are named on a UK Marketing Authorisation or where UK has been the reference member state on a decentralised procedure.

Compliance Report

Sites will be required to complete a Compliance Report in advance of inspection, this will be prompted by the inspector. A guidance document and example reports are also available to assist completion. The Compliance Report should be returned to your inspector prior to the inspection.

Compliance Report Interim Update

Following a site's first inspection post 1 April 2009, it is expected that relevant changes affecting the site will be advised to the MHRA on a Compliance Report Interim Assessment. The guidance document for the Compliance Report applies. Instructions for return are contained on the form.

Risk Rating Process

The inspection process will be largely indistinguishable from that operated in recent years and will conclude as usual with a closing meeting where findings are verbally reported to site contacts. Inspectors will discuss the submitted compliance report at the opening meeting as they would have done previously with changes advised.

The inspector will use the inspection outputs along with a number of other factors to identify a risk rating for the site, this will in turn equate to a future inspection frequency. As this process is not concluded until the inspection is closed the risk ratings **will not** be discussed at the closing meetings. However a copy of the full inspection report which includes the full risk rating rationale will be provided to sites once the inspection has been closed.

As the process is being introduced on a rolling basis it will be two – three years before all sites will have been formally assessed.

It is important to remember that issue of a certificate of GMP compliance and/or support of the site on the relevant license is indication of meeting the minimum level of GMP compliance. Risk ratings identify the degree of surveillance required within the licensing and inspection programme. There is no intention that sites be rated against each other as a result of risk ratings assigned by MHRA. Risk ratings can change following inspection resulting in either increased or decreased risk. Inspection risk ratings will not be published by MHRA.

There will be no formal process of appeal against risk ratings and future inspection frequency. However any rating that results in an increased inspection frequency from the previous standard will be peer reviewed before conclusion by a GMP Operations Manager or a GMP Expert Inspector. MHRA does have a formal complaints process if sites wish to log an issue, however any concerns regarding the inspection process should be raised with the inspector in the first instance.

Any questions or comments on Risk-Based Inspection should be addressed to your inspector in the first instance.

This document is now on the MHRA's website at http://www.mhra.gov.uk/Howweregulate/Medicines/Inspectionandstandards/GoodManufacturingPractice/Guidanceandlegislation/Risk-basedinspections/index.htm

where you can also find the forms to complete, guidelines and examples.

The content of this document and its implications for manufacturers in the UK and around the world will be discussed in the following training courses:

Pharmaceutical Law
Boston, USA
5-7 October 2009

Pharmaceutical Law & Administration
York, UK
19-23 October 2009

Pharmaceutical Legislation Update
Manchester, UK
28 October 2009

EU GMP and Inspection Readiness
San Juan, Puerto Rico
3-5 November 2009

EU GMP and Inspection Readiness
San Francisco, USA
15-17 December 2009

MLX 357 'CONSULTATION ON MEASURES TO STRENGTHEN THE MEDICINES SUPPLY CHAIN AND REDUCE THE RISK FROM COUNTERFEIT MEDICINES'

In December 2008 the MHRA published its own proposals for reducing the risk of counterfeit medicines entering the legitimate supply chain (in addition to those published by the Commission, referred to earlier). Their main proposals are to:

- Require an applicant for a Wholesale Dealer's licence to demonstrate that he/she is a 'fit and proper person' to undertake such a role, with minimum requirements to be set out in guidance.
- Require disclosure by applicants of criminal records.
- Empower MHRA to decline a Wholesale Dealer's licence if an applicant discloses a relevant criminal conviction.
- Require payment in advance of fees for the licence and for inspection.
- Introduce a 'due diligence' obligation into the legislation, with a requirement to notify the MHRA of suspicious events.
- Introduce a requirement that each 'body corporate' at a Wholesale Dealer's site must have its own Wholesale Dealer's licence which cannot be transferred to another part of the business.
- Clarify MHRA powers to refuse to grant/suspend/revoke Wholesale Dealers' licences if service fees or other fees are not paid.
- Remove the £35,000 turnover concession regarding reduced fees.

These proposals and their impact for Quality Professionals and Qualified Persons will be discussed in detail during our new one day seminar, "Linking Pharmaceutical Quality and Pharmacovigilance Systems", to be held in London on 2 October.

Industry News

US NEWS

GUIDANCE FOR INDUSTRY ON STANDARDS FOR SECURING THE DRUG SUPPLY CHAIN

This has become probably the major issue on both sides of the Atlantic since the Heparin, melamine in milk and other contamination issues that emerged during 2008. In the US, FDA has initiated a number of measures under the banner of 'Guidance for Industry on Standards for Securing the Drug Supply Chain':

Good Importer Practice

This is designed to *"prevent or detect potential problems at critical points along the product's lifecycle to avoid placing the US consumer at risk"* according to the FDA.

While not specifically addressing the pharmaceutical sector, the draft guidance contains a number of key principles that indicate the FDA's overall thinking in this area.

For example, the guidance indicates that importers should know the foreign firms that produce the products they purchase, any other firms with which they do business and through which such products pass (e.g. consolidators, trading companies and distributors).

Importers should also understand the products that they import and the vulnerabilities associated with these products, as well as the hazards that may arise during the product lifecycle, including all stages of production, and ensure proper control and monitoring of these hazards.

The guiding principles behind the document are that importers should develop a safety management programme, with defined job functions, responsibilities and accountability.

The FDA expects importers to be aware of the regulatory framework for the imported product, and make sure that they remain compliant with the requirements *"throughout the supply chain and product lifecycle"*.

Laboratory Packages

This is a draft guidance on submission of laboratory packages by accredited laboratories – which is intended to enhance the quality and reliability of test results submitted by importers to demonstrate that their products meet the FDA's requirements.

The guidance advises importers how to use accredited laboratories and makes recommendations about the quality and type of test

data and information that these laboratories should produce in support of test results submitted to the FDA. The draft guidance is also intended to reduce the likelihood that an importer will select only favourable test results to submit to the FDA.

Standardised Numerical Identification for Prescription Drug Packages

Standardised Numerical Identification for Prescription Drug Packages is the first of several draft guidances and regulations that the FDA may issue to implement Section 913 of the Food and Drug Administration Amendments Act of 2007. This guidance recommends the standards that industry should use for the identification of individual packages containing prescription drugs. These standards will facilitate the adoption of a uniform electronic track and trace system for prescription drugs to further improve their safety and security. The draft guidance was issued on 15 January 2009 with a 90-day comment period.

The draft guide calls for all drugs to be labelled using a standardised numerical identifier (SNI). The proposal is that all packages should be marked with an SNI made up of a National Drug Code (NDC), as set out in the US Food and Drug Administration's (FDA) 21 CFR part 207, and a unique, 8-digit serial number generated by the manufacturer or re-packager.

The FDA said that approach *"serves the needs of the drug supply chain as a means of identifying individual prescription drug packages. That identification can in turn facilitate authentication and tracking and tracing of the prescription drugs"*.

The agency added that: *"the NDC incorporates an 8-digit numerical serial number with the NDC, it should provide appropriate robustness to support billions of units of marketed products without duplication of an SNI"*.

Another feature on the guidance is its compatibility with the serialised Global Trade Item Number (sGTIN) model set up by the international standards organisation GS1. The FDA has been a key collaborator on the sGTIN system which, to date, has been adopted by 65 countries as a way of tracking pharmaceuticals.

Voluntary Third-Party Certification Programs

Voluntary Third Party Certification Programs for Foods and Feeds discusses the attributes of a third party certification program that would merit the FDA's confidence in the quality of the programme's audit. The guidance, finalising a draft published on July 10, 2008, is intended as one of the steps in the FDA's future recognition of voluntary third-party certification programmes for foods and animal feeds. The document makes clear that it applies to any third party certification body, including a private entity or a non-FDA federal, state, local or foreign regulatory body. Third party certification programmes can augment the ability of the FDA and the importing community to verify product safety.

Whilst this guidance does not currently impact pharmaceuticals, it is understood that FDA are considering if a similar scheme could be applied to pharmaceutical excipients (many of which are also used extensively in foods; e.g. lactose, starch, etc).

These initiatives will be discussed in detail at our new two day course "Supply Chain Assurance", to be held in London from 30 June to 1 July.

ICH NEWS

ICH Q10 WHITE PAPER

In March 2009, ICH published on its website a White Paper, "ICH Q10 – Guidelines for Pharmaceutical Quality Systems". This White Paper, written by our very own Neil Wilkinson, presents substantial reasons for pharmaceutical companies to take a second and third look at ICH Q10 guidelines and their implications for the future.

All aspects of Neil's White Paper and ICH initiatives will be covered in our new three day training course "Preparing for the Future: Successful Implementation of ICH Q8, 9 and 10", to be held in London from 2-4 June and in Philadelphia from 18-20 August.

DBA USA, grows to meet increasing demand

DBA USA, opened its offices in Boston just over 6 months ago with three staff; Jim Morris, Karen Migliaccio and Glenn Sutker. We are delighted to announce that, due to the level of demand for our services, we are in the process of more than doubling the resource at our disposal by entering into agreements with the following experienced industry professionals:

Len Mestrandrea, PhD

Len is an experienced pharmaceutical microbiologist with a Doctorate in Microbiology from Pacific Western University, a Master of Science degree in Clinical Microbiology from Wagner College and a Bachelor of Science degree from St John's University.

The first eight years of Len's career were spent with FDA at the Brooklyn office. He then spent 11 years with Sandoz Pharmaceuticals Inc., where he rose to Associate Director, Quality Assurance. Len later moved to Schering-Plough Corp., where he held a range of microbiological technical roles over an 11 year period, culminating in the position of Director, Worldwide Microbiology Support. He then spent the final five years of his industrial life fulfilling similar roles with Pfizer, Inc.

Although Len has his own consultancy, he is delighted to act as a Consultant for DBA. His vast experience of pharmaceutical microbiology, aseptic processing and FDA will be of immense value to DBA and to our growing list of clients and we welcome him on to the team.

John Lyall, BS, BA

John is an analytical chemist with over 28 years experience in the pharmaceutical industry, a Bachelor of Science in Chemistry and a Bachelor of Arts in Anthropology from York College. John retired from Pfizer, Inc. where he held the position of Director Corporate Regulatory Compliance, Corporate Quality Assurance Audits.

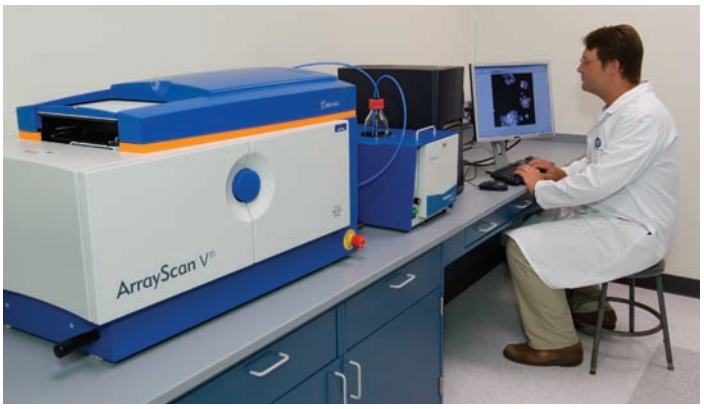
John has extensive knowledge of GMP requirements, regulatory inspections and Quality Systems, and has audited all over the world covering small and large plants, sub-contractors, warehouses, distribution centers, API plants and component suppliers.

He has held a series of progressively responsible positions in Quality Assurance and Regulatory Compliance in both the branded drug and generic drug industries. He is Certified by the American Society for Quality (ASQ) as a Quality Auditor (CQA), and as a GMP Professional (CPGP). He is a Certified Quality Systems Lead Auditor for the Registrar Accreditation Board (RAB) and the author of "GMP Audit by Mail".

We are confident that our growing team of experienced consultants, backed up by the staff in Europe, can satisfy all your regulatory and GMP consultancy, auditing and training needs.

To learn more about the services we can offer to you in the Americas, contact Jim Morris…
Telephone 617 342 3625, email USinfo@DBA-global.com

DBA Analytical



We are delighted to announce an important extension to the services offered by DBA in the USA – analytical support.

Global Lifescience Solutions™, LLC, has joined with David Begg Associates and changed its name to DBA Analytical to become the laboratory division of DBA.

DBA Analytical, based at our parent company's head offices in Ann Arbor MI, has 150,000 square feet of state-of-the-art laboratories, to provide manufacturers of dietary supplements and pharmaceuticals with the analytical services they need, while creating cost and time savings. These services include:

- **Pharmaceuticals** (Drug products, APIs and raw materials)
  - o Stability storage and testing
  - o Method development and validation
- **Dietary Supplements** (Finished products, active ingredients and raw materials)
  - o Analytical/bioanalytical services
  - o Label claim verification
  - o Stability storage and testing
  - o Method development and validation
  - o New Dietary Ingredient (NDI) Notification – Food Additive Petitions, GRAS Affirmation and Food Contact Notifications
  - o GMP auditing, consulting and training
- **Food Additives**
  - o GRAS affirmations/self-affirmations

In the coming months, we intend to greatly enhance our offerings to pharmaceutical manufacturers and development organizations, so watch this space!

For more information about DBA Analytical's services, visit our website or contact Casey Coy…

Tel: 734 913 5734, email CCoy@DBA-global.com

Quality Leadership Program generates plenty of interest

Since we announced the launch of our unique Quality Leadership training program in the last issue of the Journal, requests for more information have been fantastic!

The modular development program for future Quality Leaders and Pharmaceutical Professionals starts in Boston in October and if initial responses are anything to go by, attendees will have the opportunity to learn not only from us and the academic staff of the University of Strathclyde in Scotland, but also from fellow delegates from some of the top pharmaceutical companies in the United States. Plus, they will have the opportunity to gain a Postgraduate Diploma or Masters Degree in Pharmaceutical Quality and Good Manufacturing Practice.

All the modules are to be held in Boston and the program is as follows:

Module 1	**Pharmaceutical Law** October 5-7, 2009
Module 2	**Medicinal Chemistry & Therapeutics** November 30 – December 2, 2009
Module 3 Part I	**Formulation Processing Part 1** (non sterile product) February 2-4, 2010
Module 3 Part II	**Formulation Processing Part 11** (sterile product) April 7-9, 2010
Module 4	**Pharmaceutical Microbiology** June 2-4, 2010
Module 5	**Active Pharmaceutical Ingredients/ Supplier Assurance** August 3-5, 2010
Module 6	**Mathematics & Statistics** October 13-15, 2010
Module 7	**Analysis & Testing** December 7-9, 2010
Module 8	**Pharmaceutical Packaging** February 1-3, 2011
Module 9	**Quality Management Systems** April 4-6, 2011
Module 10	**Practical Module** dates to be announced
Module 11	**Investigational Medicinal Products** August 2-4, 2011
Module 12	**Role of the Quality Leader** October 3-5, 2011

Extensive documentation about the program has been mailed to clients and we are now enrolling delegates. If you would like to receive a personal information pack or enrol on the program, please contact us…

Tel: 617 342 3625,
Fax: 617 342 3623,
email: infoQL@DBA-global.com

Worldwide Web for a World Class Service

Now with a dedicated US section

As part of our process of continuous improvement we strive to improve on all aspects of what we do and an increasingly important part of what we do is communicate with our customers online via DBA-Global.com.

Our website is attracting more and more visitors from around the world who visit us for a variety of reasons. From looking to find out what courses are coming up to browsing the latest Journal, the site offers visitors a wealth of valuable content to those throughout the worldwide pharmaceutical industry.

We are proud of what we have achieved in developing this unique website but, never ones to rest on our laurels, we have been listening to feedback from our customers and as a result, we're making some big online changes.

Right from the revised homepage, designed for far easier navigation and less irritating scrolling, you'll find a host of new additions to the site, all well worth logging on for.

The first thing we've done following the successful launch of our American office is to add a bespoke US site aimed at providing our US customers with information that is more relevant to this markedly different marketplace. You can access the US site by clicking on the" Stars and Stripes" button at the top of each page. There you will find details of our US team and the key services we provide to the US market, including our new Quality Leadership Program. Delivered in 12 modules across two years, the Quality Leadership Program will provide pharmaceutical companies with high caliber Quality Professionals and change agents to help them conquer the ever increasing regulatory and business challenges this industry faces.

In addition we have also introduced the newest member of the DBA family to the US website. DBA Analytical is the laboratory division of David Begg Associates, specializing in contract analysis, research and consulting for our clients in the fields of pharmaceuticals, dietary supplements and food additives.

Finally, we have added a Customer Feedback section, on which we will post your views (anonymously) on the quality of our services.

And we're not finished yet! DBA-Global still has room for improvement and we would like to hear how you think we can improve things. Log on to www.DBA-Global.com and let us know what you'd like to see us doing.

Things to do in Manchester when you're on a course

Manchester is the home of the majority of our training courses and, as a result, literally thousands of people spend time in the city each year because of us.

If you are not English – and even if you are – it's likely that you won't know Manchester well, and so we would like to give you some advice on how to spend your leisure time when you visit this very unique city.

How to spend your time will depend very much on what interests you and how much time you have, so we've compiled some options and recommendations which we hope will cover a broad range of interests and tastes.

Things to do After a Long Day

Eat Out

We all have to eat and it would be a shame to eat all your meals in the course hotel, no matter how good the food, especially as there is so much good and varied cuisine within easy walking distance of our hotels. Whether you're looking for a burger or a banquet, you'll find something to match your taste and your wallet.

First, some Manchester specialities…

The Curry Mile, Rusholme

A short taxi journey from our hotels, the restaurants in the Curry Mile serve some of the finest Indian food outside the subcontinent, and at very reasonable prices

Chinatown

Within walking distance of our hotels, a huge range of high quality Chinese restaurants, plus others from the Far East. You can't go wrong here

If you are less adventurous, both in terms of cuisine and the distance you wish to travel, we can recommend the following restaurants within an easy walk of our hotels…

Seafood

Live Bait, 18 – 22 Lloyd Street
Good fish, good service and reasonable prices

Italian

San Rocco, 14 South King Street – my personal favourite
Great atmosphere, always busy, inexpensive

The Olive Press, 4 Lloyd Street
Similar to San Rocco


Manchester's Salford Quays

After Dinner…

Visit an English Pub

We are not suggesting that people who come on our courses spend their free time drinking, but many visitors to the UK like to savour the atmosphere of a traditional English pub. Sadly, the traditional pub is under threat from corporate "theme bars" in many English cities. Instead seek out the smaller, less noisy pubs with traditional names like The Grapes, The George and Dragon, etc. Fortunately, there are still hundreds remaining in Manchester.

Go to the Theatre

Manchester is home to two fine theatres. **The Royal Exchange Theatre** is in the city centre, just a short taxi ride from our hotels. Built "in the round" it provides a very special experience. **The Lowry Theatre** at Salford Quays is Manchester's newest theatre and is worth visiting for the architecture alone.

Go to a Game

Manchester has two football clubs: Manchester City (the world's richest) and Manchester United (the world's best). There is a midweek game almost every week during the winter and the hotel concierge can sometimes get you tickets – at a price.

Go Jogging

If you are like me, you hate jogging in cities – it's a very stop-start affair as you wait to cross streets etc. However, if you are staying at the Victoria & Albert Hotel there is a traffic free jogging route just outside your door. It runs alongside the River Irwell, which flows past the hotel. Go south and you can run without distraction all the way to Salford Quays and Old Trafford – a good way to start or end the day.

Things to Do on a Free Day

If you lucky enough to have a free day in Manchester before or after the course there is much more open to you.

Shopping

If a little retail therapy is what you're after, Manchester offers a wealth of choice, from the gigantic Trafford Centre shopping mall – a taxi journey or, better still, a tram ride from our hotels – to the shops off Deansgate, just a short walk from your hotel.

Museums and Galleries

If culture is more your thing, there is a wide range of museums and galleries on your doorstep. Art lovers will want to visit **The Lowry** Museum at Salford Quays, home to a magnificent collection of works by Manchester/Salford's most famous son, L S Lowry. It doesn't disappoint. If you prefer more classical paintings, the **Manchester Art Gallery** has plenty to offer.

Manchester's museums are all impressive, but we particularly recommend…

The Imperial War Museum North at Salford Quays

Not a glorification of war, but rather a sensitive investigation into why wars occur and their impact on ordinary people – well worth visiting. The building is outstanding too.

People's History Museum, Bridge Street

Less than five minutes from our hotels, a fascinating insight into the history of Manchester and the people who shaped it.

Visit The Theatre of Dreams

Mention Manchester and sport in the same sentence and most people immediately think of Manchester United. The club's stadium, Old Trafford (otherwise known as the Theatre of Dreams), is about 5km from our hotels – if you walk south along the banks of the River Irwell, which runs past the Victoria & Albert Hotel, you will reach Old Trafford in less than 30 minutes. The stadium is open to the paying public most days. You can take an escorted tour of the stadium, the turf, the changing rooms and the Manchester United Museum and trophy room. And of course you can buy a "Ronaldo" shirt in the club shop for your children, or even for you.

And Finally…

If you want to understand the city of Manchester and its heritage, you don't have to go to a museum – you can experience the history and glory of Manchester simply by walking the streets and looking up at the marvellous Victorian architecture that bears witness to a prosperous city built on cotton and the industrial revolution. Walk the canals which brought materials to the city and took goods away. Admire the railway architecture on the doorsteps of your hotels. Then contrast all this with the bold modern architecture of 21st century Manchester. And do all this for free!

To learn much more about what Manchester has to offer and the events during your visit, go to www.visitmanchester.com

DBA

The Pharmaceutical Training Specialists

QP Alumni – third meeting

DBA is delighted to announce the third annual Alumni meeting of DBA trained Qualified Persons.

This will take place on 3 and 4 June at the York Marriott Hotel. This event has proven very popular in the past and promises to be well attended again this year. The busy agenda over the two days will include some sessions of shared best practice among the wide range of companies represented on a selection of current hot topics for the busy QP of today.

In addition we are delighted that two of the most experienced MHRA inspectors are joining the event to discuss some QP issues in an afternoon of exchanges which will prove invaluable to any QP and the inspectorate alike.

Any DBA trained QP who has taken four or more training modules with us since 1990 is eligible to attend this event. These Alumni events are designed to be not-for-profit but a service to our loyal customer base and are priced to be the most cost effective CPD available to any QP. To date the Alumni includes a database of over 190 QPs plus a number of individuals who took the modules but career changes have meant that they did not take the assessments to become QPs.

So as well as a chance to share best practice and discuss today's hot topics the event will be a fantastic networking opportunity. We look forward to seeing all past QP "core" delegates there!

Congratulations to:

In the past few months, DBA has helped the following people obtain QP status:

Cecile Begat,
Health Protection Agency

Jordan Costello,
BOC Gases (Ireland)

Trevor Watson,
Rosemont Pharmaceuticals Ltd

Trevor Clarke,
Almac Group Ltd

In the next DBA Journal

Industry News: As ever, we search for regulatory changes so you don't have to; Tech Talk: Steam quality – what's all the fuss about? Location, Location, Location…: The Royal Sonesta Hotel, Boston; DBA People: Helping you to get to know us better; Forthcoming Courses: A review of courses for Autumn and Winter 2009; Plus: all the latest news for Qualified Persons and what's new in our US offices.

If you have any comments or suggestions for the next issue of the Journal, please email us at journal@DBA-global.com

David Begg Associates

Europe The Georgian House, 22-24 West End, Kirkbymoorside, York, UK, YO62 6AF
Tel: +44 (0)1751 432999 Fax: +44 (0)1751 432450 Email: mail@DBA-global.com

USA Suite 19, 101 Federal St., Boston, MA 02110, USA
Tel: 617-342 3625 Fax: 617-342 3623 Email: USinfo@DBA-global.com

DBA-global.com