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Template for the Qualified Person's declaration concerning GMP compliance of the active substance used as starting material and verification of its supply chain "The QP declaration template"

Draft

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Comments should be provided using this template. The completed comments form should be sent to qwp@ema.europa.eu

Keywords	*Qualified Person; Active Substance; Starting Material; good Manufacturing Practise; Supply Chain*

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TEMPLATE FOR THE QUALIFIED PERSON'S DECLARATION CONCERNING GMP COMPLIANCE OF THE ACTIVE SUBSTANCE USED AS STARTING MATERIAL AND VERIFICATION OF ITS SUPPLY CHAIN "The QP Declaration Template"

1. ISSUE/OBJECTIVE

The objective of this Qualified Person (QP) Declaration Template is to emphasise the importance of providing a comprehensive declaration, to harmonise the format for the declaration, to forestall questions during assessment, and to enhance the efficiency of the regulatory process.

The quality of medicinal products depends to a large degree on the quality of the active substances used to formulate them. Medicinal product manufacturers have the prime responsibility for ensuring the quality of active substances in terms of GMP compliance and prevention of falsification and should therefore take appropriate measures to:

(i) Verify the GMP compliance of all parties in the supply chain and that all sources are in accordance with relevant marketing authorisations.

(ii) Fully understand and control the supply chain of active substances used by them (including brokers, re-labellers and re-packagers) and take steps to shorten the supply chain wherever possible.

(iii) Clearly demonstrate that each batch of active substance accepted by them for use in the manufacture of medicinal products has been sourced through this supply chain.

In order to satisfy the above requirements, the manufacturer will submit a declaration that addresses GMP compliance and supply chain verification.

The attached QP declaration template provides, in a format considered suitable for submission, a basis for demonstrating compliance of the active substance manufacture with GMP requirements and that the manufacturer has relevant knowledge of the supply chain.

QP Declarations are required from each EEA finished product manufacturing site and/or from each site of importation/batch certification. However, a single declaration from one QP from one of the registered finished product or batch release sites may be sufficient, if its basis is satisfactorily described and supported by technical agreements between these sites (see Part B and E).

The QP Declaration should be provided in support of an application for a new marketing authorisation, variation or renewal of a medicinal product(s) authorised in the Community, using EU or national procedures within the scope of Directive 2001/83/EC[1] (human medicinal products) and Directive 2001/82/EC[2] (veterinary medicinal products). A declaration is not required for blood or blood components; they are subject to the requirements of Directive 2002/98/EC[8].

2. REGULATORY BASIS

2.1 GMP compliance

In accordance with Article 46(f) of Directive 2001/83/EC (human medicinal products) and Article 50(f) of Directive 2001/82/EC (veterinary medicinal products) as amended, Manufacturing Authorisation holders are required to use as starting materials only active substances which have been manufactured in accordance with the detailed guidelines on the Good Manufacturing Practice (GMP) for starting materials as adopted by the Community.

Confirmation of compliance is required for all applications for new marketing authorisations, renewals and for variations concerning a change (addition or replacement) to the registered manufacturer(s) of the active substance, finished product or batch importation/certification sites. For variations, the relevant legislative framework is provided by:- Commission Regulation (EC) No. 1234/2008 on variations[3] and Communication from the Commission - Guideline on the details of the various categories of variations to the terms of marketing authorisations for medicinal products for human use and veterinary medicinal products[4].

Compliance for the above regulatory submissions is demonstrated by provision of *Qualified Person's Declaration Concerning GMP Compliance of the Active Substance Used as Starting Material and Verification of its Supply Chain* (i.e. the "QP declaration").

The QP Declaration should be based upon the direct audit of the active substance manufacturers, by or on behalf of the MAH, by a suitably trained and experienced person, which may be a third party contractor[5, 6].

GMP certificates from a relevant Competent Authority cannot replace direct audits, but the results of such inspections may be used, together with other supporting information, in a risk-based approach by the manufacturer in establishing priorities for its own audit programme of active substance suppliers[7].

2.2 Verification of the Active Substance supply chain traceability

The supply chain is a family tree for the active substance tracing its history or supply chain from critical raw material(s) used in the manufacture of the active substance to the manufacturer of the dosage form. The sites will include manufacturers of critical raw materials (as defined in Part II of the EU GMP Guide 7.11, 7.13), active substance manufacturers, brokers, traders, repackers, relabellers, micronisers and importers.

This supply chain traceability should be established and documented. Verification of the availability of this forms part of the QP Declaration (Part D).

Supply chain traceability is considered a matter of GMP and it should be maintained by the Manufacturing Authorisation holder. This should be made available for inspection at the request of the competent authorities. Competent authorities need not be notified of amendments to the supply chain that are outside the scope of the Commission Regulation on variations[4]. Therefore, variations will only be required for changes to active substance manufacturers involved in the synthesis of the active substance from the designated starting materials to the final active substance as described in the marketing authorisation dossier Module 3.2.S.

3. FORMAT AND GUIDANCE NOTES FOR THE QP DECLARATION TEMPLATE

The QP declaration provides the necessary information required to demonstrate compliance with Article 46(f) of Directive 2001/83/EC and Article 50(f) of Directive 2001/82/EC that the Manufacturing Authorisation holder uses as starting materials only active substances which have been manufactured in accordance with the detailed guidelines on the Good Manufacturing Practice (GMP) for starting materials as adopted by the Community. Additionally, the QP declaration confirms the manufacturer has established a defined supply chain traceability for the active substance in compliance with Article 46a of Directive 2001/83/EC and Article 50a of Directive 2001/82/EC, as amended. Verification of this is a requirement of the QP Declaration (Part D).

A QP declaration is required in support of a submission for a new marketing authorisation (MA) application, renewal or variation, for a human or veterinary medicinal product. As such, the QP

declaration will be accompanied by the relevant application form, which sets out the scope of the QP declaration and defines the applicable medicinal products.

The format of the QP declaration template is in five parts (Parts A to E) and each must be completed. In order for the QP declaration to be valid, all the relevant tick box(es) must be checked and the necessary information entered into the provided tables, as applicable. Guidance notes for completion of each section are provided below

PART A: Concerned Manufacturing Sites

This declares all the relevant sites that are subject to the QP declaration as applicable to the regulatory submission accompanying the QP declaration (i.e. a new MA, renewal or variation application). A decision tree for completion of Parts A and B of the QP declaration form is provided in Annex 1. The relevant sites and their respective functions are to be listed in the table provided according to the submission type, as shown below.

- For a new MA application: all proposed active substance / finished product (EEA and non-EEA)/ importation / batch certification sites;
- For a Renewal: all currently approved active substance / finished product (EEA and non-EEA)/ importation / batch certification sites;
- For a variation application to add a new finished product / importation / batch certification site: the proposed site and all currently approved active substance / finished product (EEA and non-EEA) / importation / batch certification sites;
- For a variation application to add a new active substance manufacturing site: the proposed site and all currently approved / finished product (EEA and non-EEA)/ importation / batch certification sites.

Note: According to the variation classification guideline[4], currently approved active substance manufacturing site(s) for which valid QP declaration(s) is/are in place need not be listed in the table provided.

Optionally, the applicant may take the opportunity to include all currently registered active substance manufacturing sites in order to provide an updated QP declaration.

The following are taken into consideration in respect of the relevant sites that are listed in the table and which are subject of this QP declaration:

1. Batch certification can take place at the finished product manufacturer, at the importer (in the case of product manufactured in a third country) or at another EU site, if they hold an authorisation for batch certification.
2. No site may be exempted i.e. omitted from the table provided. Sites that are considered redundant should be deleted from the MA. Manufacturing sites that are located outside the EEA should be listed for transparency as this puts the QP declaration and arrangements for auditing within the context of the regulatory submission.

PART B Declaration of GMP Compliance

In this section the QP declares GMP compliance of the active substance manufacturer(s) and indicates whether a single or multiple declarations are provided covering all relevant manufacturing sites listed in PART A. A decision tree for completion of Parts A and B of the QP declaration form and identification of those cases where single or multiple declarations are required is provided in Annex 1.

In principle, individual declarations are expected from:

- The QP of each Manufacturing Authorisation holders (EEA) that use the active substance as a starting material

and

- The QP of each Manufacturing Authorisation holder responsible for importation / batch certification when the importation / batch certification site is a different site from the above. This is because the QP responsible for importation / batch certification takes overall responsibility for each batch.

Where more than one QP operates at a particular site, a declaration from one QP only is expected.

Thus in principle, multiple (individual) declarations are required covering all the relevant manufacturing (EEA) / importation / batch certification sites as listed in PART A that use the active substance as a starting material. However, a single declaration may be acceptable under certain circumstances.

In PART B, one of the following options must be completed as specified below by selecting the relevant tick-box. In each case, the QP signifies compliance with the requirements underpinning the declaration as set out in PART E.

(i). Single declaration encompassing all relevant sites listed in PART A

A single declaration signed by one QP may be acceptable in a situation where:-

- only one Manufacturing Authorisation is involved i.e. the product manufacturing site (EEA) / importation / batch certification sites are the same site or group of companies,

or

- more than one Manufacturing Authorisation holder is involved i.e. the product manufacturing site (EEA) / importation / batch certification sites are NOT the same site or group of companies. In this situation, the QP makes the declaration on behalf of all concerned QPs and confirms that this is underpinned by a technical agreement as set out in PART E.

Note:- where a single declaration is provided, only one completed QP declaration form is to be submitted.

(ii). Multiple (individual) declarations covering all relevant sites listed in Part A

Where it is not feasible to provide a single declaration covering all applicable finished product (EEA) / importation / batch certification sites where active substance is used as starting material, instead individual declarations may be submitted. In this case, the table provided should be completed to indicate those sites for which the QP is responsible for GMP compliance and is authorised to make the declaration.

Note:

1. There may be instances where it is possible to provide a single QP declaration for some manufacturing sites but individual declarations are required for other sites.

2. The Applicant is responsible for ensuring that that additional QP declaration forms have been provided to encompass all active substance / finished product (EEA) / importation / batch certification sites as listed in PART A.

   A covering note may be provided with the submission to confirm this.

PART C Basis of the Declaration

According to Directives 2001/83/EC and 2001/82/EC, as amended, and GMP requirements, it is expected that Manufacturing Authorisation holders will normally gain assurance that the active substance(s) used are manufactured in accordance with GMP through direct audit of the active substance manufacturer(s)[5].

The arrangements for auditing that are applicable to the present QP declaration are indicated by completing sections (i), (ii) or (iii) as show below. In case of multiple active substance manufacturing sites as listed in PART A, the required information should be stated for all sites referred to in the regulatory submission.

Section (iv) enables supplementary information to be optionally submitted in support of the QP declaration.

PART C includes tick boxes that should be completed as confirmation that audit reports and other documentation pertaining to the audit are available for inspection by the Competent Authorities.

Section (i) audit conducted by Manufacturing Authorisation holder(s)

Section (i) indicates that the Manufacturing Authorisation holder has conducted a direct audit of the active substance manufacturer(s). The table provided is completed to state those active substance manufacturing sites that have been audited by the Manufacturing Authorisation holder and the date of the last audit, which is expected to be within the last 3 years. Suitable justification should be provided in case the audit frequency exceeds 3 years.

Section (ii) audit conducted by third party

Section (ii) indicates that an audit of the active substance manufacturing sites listed in the table provided has been conducted on behalf of the Manufacturing Authorisation holder by a suitably qualified third party (contractor). In this case, information should be provided as to who has conducted any audit(s) as appropriate e.g. third party including their relationships to Manufacturing Authorisation holder.

Tick boxes are completed to certify that the contract acceptors are properly qualified and that appropriate technical agreements are in place between the contract giver and acceptor.

Section (iii) evidence provided in lieu of audit

Section (iii) should be completed only in exceptional circumstances where direct audit of the active substance manufacturer is not possible. In these circumstances, other arrangements for verifying the GMP status of the active substance manufacturer may be deemed acceptable. The relevant tick box is completed to indicate one of two possible scenarios, as applicable:

- remote assessment e.g. based on questionnaires and review of relevant documentation. This may be justified on grounds of current travel advice provided by the local authorities of the EEA member states;
- other situations e.g. as applicable to non-traditional (or atypical) active substances. Appropriate elements of the EU GMP guide part II are nevertheless expected to be applied by the active substance and finished product manufacturers. As a principal, such controls must provide confidence that the ‘Atypical’ active substance is fit for purpose and will not negatively affect the safety and efficacy of the drug product. The QP is expected to justify the controls in place on a scientific basis and record a risk assessment on a product specific basis. Further guidance has been published[9, 10].

In each of the above exceptional cases, an appropriate justification for the lack of an on-site audit should be provided together with a list of supporting information on which the verification of GMP compliance is based. The suitability of the justification provided may also be subject to review by the competent authority inspectors.

Section (iv) supplementary supportive information (optional)

Section (iv) refers to supplementary information that may optionally be attached to the QP declaration to support a risk-based approach by the manufacturer in establishing priorities for its own audit programme. For example, results of inspection report(s) or GMP certificate(s) issued by EEA, Mutual Recognition Agreement (MRA) partners or other recognised authority together with other supporting information. The table provided should be completed to summarise the information that has been provided. It should be noted however that this supporting information alone cannot fulfill the statutory obligations of the Manufacturing Authorisation holder or the requirements of section 5.25 of the GMP Guide. Further guidance is available[7, 11].

PART D Verification of the active substance supply chain traceability

This section declares three key aspects of the defined supply chain for each of the active substance manufacturing sites listed in PART A i.e. that:-

(i) the supply chain had been established and is documented

(ii) there exists a documented risk assessment for all sites in the supply chain

(iii) the above documents are available for inspection

PART E Attestation of the responsible QP

This declares that the signatory is the QP responsible for the relevant product manufacturer(s) (EEA) and importation and/or batch certification sites referenced in PART B.

Applicants are reminded that, according to Art. 41 of Directive 2001/83/EC and Article 45 of Directive 2001/82/EC, Manufacturing Authorisation holders shall have at their disposal at least one Qualified Person located in the EEA. Therefore declarations from persons employed by manufacturers in third countries, including those located within MRA partner countries, are not acceptable. The latter may, however be used to provide supportive information for the QP declaration – see PART C (iv).

This section also sets out the requirements in situations where a declaration covers multiple sites listed in PART A and the QP confirms that appropriate technical agreements are in place between sites/companies concerning GMP compliance. It is expected that arrangements concerning GMP of the active substance between companies are underpinned by agreement/procedures irrespective of whether the companies are within the same group or not.

The declaration is signed and the relevant details of the QP are provided (name, status, and Manufacturing Authorisation holder name and number). The QP details should be consistent with those named within the relevant regulatory submission application form and/or the Manufacturing Authorisation.

References:

1. Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal products for human use (Consolidated version : 05/10/2009).

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2001L0083:20091005:EN:PDF

2. Consolidated Directive 2001/82/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to veterinary medicinal products as amended by Directive 2004/28/EC

http://ec.europa.eu/health/files/eudralex/vol-5/consol_2004/dir_2001_02-dir_2004_28-cons_en.pdf

3. Commission Regulation (EC) No 1234/2008 of 24 November 2008 concerning the examination of variations to the terms of marketing authorisations for medicinal products for human use and veterinary medicinal products (Official Journal L 334, 12/12/2008 p. 7 - 24).

http://ec.europa.eu/health/files/eudralex/vol-1/reg_2008_1234/reg_2008_1234_en.pdf

4. Communication from the Commission — Guideline on the details of the various categories of variations to the terms of marketing authorisations for medicinal products for human use and veterinary medicinal products (2010/C 17/01)

http://ec.europa.eu/health/files/eudralex/vol-2/c17_1/c17_1_en.pdf

5. European Medicines Agency: Inspections: Q&A: Good Manufacturing Practice (GMP)

EU GMP guide part II Basic requirements for active substances used as starting materials: GMP compliance for active substances

Q1: How can GMP compliance for active substance manufacturers be demonstrated?

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/q_and_a/q_and_a_detail_000027.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac05800296ca&jsenabled=true

6. European Medicines Agency: Inspections: Q&A: Good Manufacturing Practice (GMP)

EU GMP guide part I Basic requirements for medicinal products: Chapter 5 Qualification of suppliers.

Q1 Is an audit performed by a third party acceptable?

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/q_and_a/q_and_a_detail_000027.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac05800296ca&jsenabled=true#section10

7. European Medicines Agency: Inspections: Q&A: Good Manufacturing Practice (GMP)

EU GMP guide part II Basic requirements for active substances used as starting materials: GMP compliance for active substances

Q2: Do I need to perform an audit of an active substance supplier if it has been inspected by an inspectorate from an EEA member state and a valid GMP certificate is available?

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/q_and_a/q_and_a_detail_000027.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac05800296ca&jsenabled=true

8. Directive 2002/98/EC of the European Parliament and of the Council of 27 January 2003 setting standards of quality and safety for the collection, testing, processing, storage and distribution of

human blood and blood components and amending Directive 2001/83/EC (Official Journal L 33, 8/2/2003 p. 30 - 40).

http://ec.europa.eu/health/files/eudralex/vol-1/dir_2002_98/dir_2002_98_en.pdf

9. European Medicines Agency: Inspections: Q&A: Good Manufacturing Practice (GMP)

EU GMP guide part II Basic requirements for active substances used as starting materials: GMP compliance for active substances

Q6: The Notice to Applicants requires the submission of a declaration signed by the Qualified Person that the active substance used is manufactured in accordance with GMP. The active substance in my product is widely used, but not normally as a pharmaceutical active substance, and I am having some difficulty in confirming compliance. What should I do to furnish the required declaration?

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/q_and_a/q_and_a_detail_000027.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac05800296ca&jsenabled=true

10. Medicines and Healthcare products Regulatory Agency (MHRA):

Active Pharmaceutical Ingredients (API):

Good Manufacturing Practice (GMP) expectations for Active Pharmaceutical Ingredients (APIs)

GMP expectations of Non Traditional APIs

http://www.mhra.gov.uk/Howweregulate/Medicines/Inspectionandstandards/GoodManufacturingPractice/Guidanceandlegislation/ActivePharmaceuticalIngredientsAPI/index.htm

11. European Medicines Agency: Inspections: Mutual Recognition Agreements

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/document_listing/document_listing_000248.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac058005f8ac

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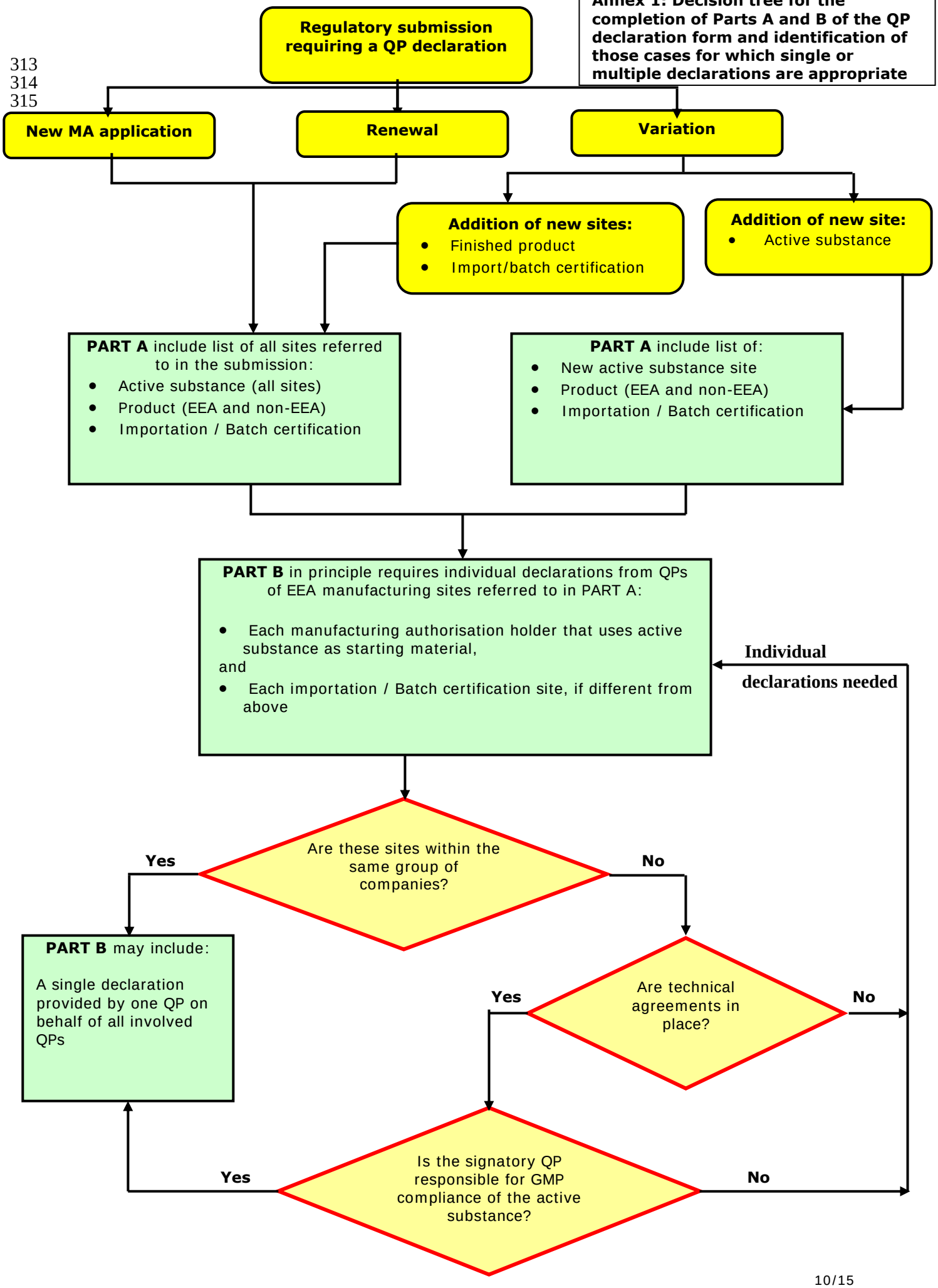
Annex 1: Decision tree for the completion of Parts A and B of the QP declaration form and identification of those cases for which single or multiple declarations are appropriate



QUALIFIED PERSON'S DECLARATION CONCERNING GMP COMPLIANCE OF THE ACTIVESUBSTANCE USED AS STARTING MATERIAL AND VERIFICATION OF ITS SUPPLY CHAIN "The QP Declaration Template"

PART A: Concerned Manufacturing Sites

I confirm that all sites concerned with manufacture of the active substance ***[insert name of active substance]***, and finished product and importation and/or batch certification for product(s) defined in the accompanying application form for the MA application/renewal/variation [***delete as applicable]***, are stated below, as applicable.

MANUFACTURING SITES SUBJECT OF THIS DECLARATION[1]		
ACTIVE SUBSTANCE MANUFACTURING SITE [2, 3] AND FUNCTION(S)	**FINISHED PRODUCT MANUFACTURING SITE(S) AND FUNCTION(S)**	**IMPORTATION AND/OR BATCH CERTIFICATION SITE**

1 Where the Applicant has multiple sites for the manufacture of active substance, product or importation and/or batch certification, the QP declaration shall encompass all these sites, as applicable to the regulatory submission defined in the accompanying application form.

No site may be exempted from this list.

All sites concerned with part processing should be listed.

2 State the site name and address in detail, including the building numbers and function.

This information may additionally be provided in a flow chart for clarity.

3 List each site involved in the synthesis of the active substance beginning with the introduction of the designated active substance starting material.

PART B: Declaration of GMP Compliance

I declare that ***[insert name of active substance]*** used as starting material in the manufacture of product as defined in the accompanying application form and in PART A of this QP declaration, is manufactured in accordance with the detailed guideline on good manufacturing practice for active substances used as starting materials as required by Article 46(f) of Directive 2001/83/EC and Article 50(f) of Directive 2001/82/EC, as amended. This declaration is underpinned by requirements as set out in PART E and is provided as follows:

Please tick and complete only one of the following options, either (i) or (ii), as applicable

☐ **(i). Single declaration encompassing all relevant sites listed in PART A**

A single declaration signed by one QP is provided covering all applicable active substance / finished product (EEA)/ importation / batch certification sites as listed in PART A.

or

☐ **(ii). Multiple (individual) declarations covering all relevant sites listed in PART A**

It is not feasible to provide a single declaration covering all applicable finished product (EEA) / importation / batch certification sites where active substance is used as starting material.

Instead, individual declarations are submitted from each of the manufacturing sites listed in PART A.

This QP declaration covers the manufacturing sites listed below that use active substance as starting material.

NAME OF ACTIVE SUBSTANCE MANUFACTURING SITE(S)	NAME OF PRODUCT MANUFACTURING (EEA) /IMPORTATION/BATCH CERTIFICATION SITE(S)	MANUFACTURING / IMPORTATION AUTHORISATION NUMBER (MIA)

PART C: Basis of the Declaration

I declare that:

GMP compliance of the manufacturer(s) of the active substance ***[insert name of active substance]*** listed in PART A has been verified on the basis of (i) or (ii) or (iii) – one of these sections should be completed. Additional supporting information may optionally be included in section (iv).

and

Audit report(s) and other documentation relating to the audit(s) of the active substance manufacturer(s) listed in PART A are in place and will be made available for inspection by the competent authorities if requested.

Please tick and complete each section, as applicable

☐ **(i) Audit of the active substance manufacturer(s) conducted by Manufacturing Authorisation holder(s):**

Audit(s) of the active substance manufacturer(s) listed in PART A relative to the product stated in this declaration has/have been completed by the Manufacturing Authorisation holder as listed below and all critical concerns have been rectified:

Name of active substance manufacturer	**Name of Manufacturing Authorisation holder (or corporate representative, within the same group of companies) having conducted the audit**	**Date of last audit[4]**

4 Justification should be provided below if the date of last inspection exceeds 3 years:

☐ **(ii) Audit of the active substance manufacturer(s) conducted by third party**

Audit(s) of the active substance manufacturer(s) listed in PART A relative to the product(s) stated in this declaration has/have been completed by the third party auditing body(ies) i.e. contract acceptor(s) on behalf of the Manufacturing Authorisation holder(s) i.e. contract giver(s) as listed below and all significant corrective actions have been completed:

Name of active substance manufacturer	**Auditing body (contract acceptor)**	**Name of Manufacturing Authorisation holder (contract giver)**	**Date of audit (completion)[4]**

4 Justification should be provided below if the date of last inspection exceeds 3 years:

and,

I declare that:

☐ (i) I have evaluated each of the named contract acceptor(s) in respect of the above audit(s). The audit(s) was/were conducted by properly qualified and trained staff, in accordance with approved procedures.

and,

☐ (ii) Technical contractual arrangements are in place and that any measures taken by the contract giver(s) are documented e.g. signed undertakings by the auditor(s).

☐ **(iii) Evidence provided in lieu of audit**

Exceptionally, and if satisfactorily justified, other supporting evidence used in lieu of an on-site audit of the active substance manufacturer(s) by the manufacturer(s).

Please tick and complete the applicable section and provide appropriate supporting information:

☐ Remote assessment based on, for example, questionnaires, review of documents, ISO 9000 certification, results of analytical testing and historical experience with the supplier.

The justification for this approach is attached.

Or

☐ Other situations e.g. Non Traditional (or Atypical) Active Substance

The justification for this approach is attached (see guidance notes).

(iv) Supplementary supportive information (optional):

For the active substance manufacturing sites listed below results of inspection report(s) or GMP certificate(s) issued by EEA, MRA partners or other recognised authority together with other supporting information are attached.

Name of active substance manufacturer	**Summary of supporting information provided**

PART D: Verification of the Active Substance supply chain traceability

I declare that:-

(i) the active substance supply chain of each of the active substance manufacturing sites listed in Part A has been established and documented.

and,

(ii) there exists a documented risk assessment for all sites in the supply chain of the active substance.

and,

(iii) the above documents are available for inspection.

PART E: Attestation of the responsible QP

This section declares that the signatory is the QP responsible for the relevant product manufacturer(s) (EEA) and importation and/or batch certification sites as referenced in PART B.

I confirm that:

(a) I am a QP with responsibility for GMP compliance of the active substance and am authorised to make this declaration;

(b) In the case of multiple sites as specified in PART B, this declaration is made on behalf of all the involved QPs named on the relevant Manufacturing Authorisation(s)

(c) the arrangements are underpinned by a technical agreement as described in Chapter 7 of the GMP Guide, as applicable;

(d) a documented procedure defining GMP responsibilities is in place and that arrangements/agreements exist between the named companies concerning management of GMP responsibilities;

(e) the relevant technical agreements and procedures are available for inspection by the competent authorities.

This declaration is submitted by:-

Signatory _____ Print name _____ Date _____	Status (job title) _____ Manufacturing Authorisation name: _____ Manufacturing Authorisation number: _____