Appendix 3 – Division of the pharmaceutical-technical responsibilities

Product:
Contract Giver (CG): *(Name of location)*
Contract Acceptor(CA): *(Name of location)*
x = responsible party n.a. = not applicable

REGULATORY ASPECTS	Contract Giver (CG)
Compliance with the Marketing Authorisation registration file *1	
Handover current registration file (§1 p. 6/ CTD module 3)	
Information about variations to marketing authorisation and update of the marketing authorisation as well as quality relevant information about product and starting materials (eg. CEP (Certificate of Suitability), ongoing data, counterfeit)	

*1 Verantwortung für Zulassungskonformität bei CG nur möglich, wenn CA nicht für die Marktfreigabe verantwortlich ist oder wenn die freigebende QP sich beim CG davon überzeugt, dass funktionierende Dokumentenmanagement- und CC-Verfahren etabliert sind.

	Contract Giver (CG)	Contract Acceptor (CA)
ACTIVE INGREDIENT(S)		
Handover specifications according to the Marketing Authorisation (incl. information on storage and packaging)		
Handover testing instructions according to the Marketing Authorisation		
Supply of actives through CA		
- Supplier/manufacturer evaluation		
- GMP-compliance of API – manufacturer (by QP statement through CG/ audit report)		
- QA agreement with manufacturer		
- transport of API		
Procurement through CG		
- Supplier/manufacturer evaluation *2		
- GMP-compliance of API – manufacturer and audit		
Supply of approved and tested API through CG		
Identity testing		
Quality testing		
Approval for further processing		
Storage of quality records		
Storage of reference samples		

*2 Problematisch, falls Marktfreigabe durch CA erfolgt → gilt im Folgenden auch an anderen Stellen z.B. bei „other starting material" etc.
Gilt im Folgenden auch für andere Ausgangsmaterialien, die vom CG beigestellt werden.

OTHER STARTING MATERIALS		
Handover specifications according to the Marketing Authorisation (incl. information on storage and packaging)		
Handover testing instructions according to the Marketing Authorisation		
Supply of other starting materials through CA		
- Supplier/manufacturer evaluation		
Procurement through CG		
- Supplier/manufacturer evaluation		
Supply of approved and tested material through CG		
Identity testing		
Quality testing		
Approval for further processing		
Storage of quality records		
Storage of reference samples		

Division of the pharmaceutical-technical responsibilities

	Contract Giver (CG)	Contract Acceptor (CA)
PRIMARY PACKAGING MATERIALS (foils, bottles, containers, closures)		
Handover specifications according to the Marketing Authorisation		
Handover testing instructions according to the Marketing Authorisation		
Handover technical specification (code/material numbers)		
Performance artwork		
Review and approval of artwork		
Procurement of materials through CA		
Supplier/manufacturer evaluation		
Supply of materials through CG		
Supplier/manufacturer evaluation		
Supply of approved materials through CG		
Quality testing		
Approval for further processing		
Storage of quality records		
Storage of reference samples		
SECONDARY PACKAGING MATERIALS (cartons, leaflets, labels, measuring aids)		
Handover specifications according to the Marketing Authorisation		
Handover testing instructions according to the Marketing Authorisation		
Technical specification (code/material numbers)		
Performance artwork		
Review and approval of artwork		
Procurement of materials through CA		
Supplier/manufacturer evaluation		
Supply of materials through CG		
Supplier/manufacturer evaluation		
Supply of approved materials through CG		
Quality testing		
Approval for further processing		
Storage of quality records		
Storage of reference samples		
OTHER PACKAGING MATERIALS (eg. shipping label, cartons)		
Handover specifications		
Handover testing instructions according to the Marketing Authorisation		
Technical specification (code/material numbers)		
Performance artwork		
Review and approval of artwork		
Procurement of materials through CA		
Supplier/manufacturer evaluation		
Supply of materials through CG		
Supplier/manufacturer evaluation		

x = responsible party
n.a. = not applicable

Division of the pharmaceutical-technical responsibilities

	Contract Giver (CG)	Contract Acceptor (CA)
OTHER PACKAGING MATERIALS		
Supply of approved materials through CG		
Quality testing		
Approval for further processing		
Storage of quality records		
Storage of reference samples		
BULK PRODUCT		
Handover specifications according to the Marketing Authorisation (incl. information on storage and packaging)		
Handover testing instructions according to the Marketing Authorisation		
Creation of internal specification (according to the Marketing Authorisation)		
Review and approval of the specification in compliance with the Marketing Authorisation through CG		
Creation of master manufacturing instructions according to Marketing Authorisation		
Review and approval of master manufacturing instructions in compliance with the Marketing Authorisation (through CG)		
Manufacturing process		
In-process controls		
Manufacturing records		
Assignment of bulk batch number		
Creation of internal testing instructions according to the Marketing Authorisation		
Review and approval of testing instructions in compliance with the Marketing Authorisation		
Quality testing		
Supply and testing of reference substances		
Testing records		
CoA bulk (unless shipped as finished product)		
Approval for further processing		
Storage of manufacturing records		
Storage of quality records		
Handover of bulk stability data		
Certificate of Compliance		
FINISHED PRODUCT		
Handover specifications according to the Marketing Authorisation (incl. information on storage and packaging)		
Handover testing instructions according to the Marketing Authorisation		
Creation of internal specification (according to the Marketing Authorisation)		
Review and approval of the specification in compliance with the Marketing Authorisation through CG		
Creation of packaging instructions according to the Marketing Authorisation		
Review and approval of packaging instructions in compliance with the Marketing Authorisation through CG		
Assignment of batch number		

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n.a. = not applicable

Division of the pharmaceutical-technical responsibilities

	Contract Giver (CG)	Contract Acceptor (CA)
FINISHED PRODUCT		
Assignment of expiration date		
Information about shelf life		
Packaging		
In-process controls		
Packaging records		
Quality testing		
Testing records		
Certificate of Analysis		
Storage of packaging records		
Storage of retained samples		
Storage of quality records		
Approval for shipment		
Final release to the market		
Certificate of Compliance (Batch certification according to the EC GMP Guide, Annex 16)		
Responsibility for distribution of released finished products		
VALIDATION		
Process validation – creation of protocol		
Process validation – approval of protocol		
Process validation – performance		
Process validation – creation of report		
Process validation – evaluation of report		
Process validation – approval of report		
Method validation/ method transfer – creation of protocol		
Method validation/ method transfer – approval of protocol		
Method validation/ method transfer – performance		
Method validation/ method transfer – creation of report		
Method validation/ method transfer – evaluation of report		
Method validation/ method transfer – approval of report		
PRODUCT QUALITY REVIEW (PQR) according to EU GMP Guideline		
(i) A review of starting materials and packaging materials used for the product, especially those from new sources		
(ii) A review of critical in-process controls and finished product results		
(iii) A review of all batches that failed to meet established specification(s) and their investigation		
(iv) A review of all significant deviations or non-conformances, their related investigations, and the effectiveness of resultant corrective and preventive actions taken		
(v) A review of all changes carried out to the process or analytical method		
(vi) A review of Marketing Authorisation variations submitted/granted/refused, including those for third country (export only) dossiers		
(vii) A review of the results of the stability monitoring programme and any adverse trends		
(viii) A review of all quality-related returns, complaints and recalls and the investigations performed at the time		

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	Contract Giver (CG)	Contract Acceptor (CA)
PRODUCT QUALITY REVIEW (PQR) according to EU GMP Guideline		
(ix) A review of adequacy of any other previous product process or equipment corrective actions		
(x) For new marketing authorisations and variations to marketing authorisations, a review of post-marketing commitments		
(xi) The qualification status of relevant equipment and utilities, e.g. HVAC, water, compressed gases, etc		
(xii) A review of Technical Agreement to ensure that they are up to date		
Evaluation of PQR		
Handover PQR to CA **		

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*** only on order of CG --> separate agreement**

** only applicable if CA is responsible for market release of the product.

Division of the pharmaceutical-technical responsibilities

	Contract Giver (CG)	Contract Acceptor (CA)
STABILITY TEST (ONGOING STABILITY)		
Handover of shelf life specification according to the Marketing Authorisation		
Stability test protocol – Creation of protocol		
Stability test protocol – Approval of protocol		
Storage of stability test samples		
Performance of stability test		
Evaluation of stability test		
Decision on additional stability studies in case of deviations or changes		
Information of responsible QP on results		
Information of competent authority in case of OOS		
PHARMACOVIGILANCE		
Information of the competent authorities		
Responsibility for PSUR (Periodic Safety Update Report)		
COMPLAINTS		
Information about product complaints		
Support in investigation, evaluation and statement about the complaint		
Information of the competent authorities		
PRODUCT RECALL		
Initiation of product recall		
Organisation and performance of the product recall		
Information of the competent authorities		
Information about product recall from CG to CA		
TRANSPORTATION of Bulk and /or Finished Product		
Responsibility for transportation and transportation conditions from CA to CG or consignee		
Definition of transport conditions / requirements		
Validation of transport		

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CG TO RECEIVE THE FOLLOWING DOCUMENTATION	Each con-signment	Upon request
STARTING MATERIALS		
Certificate of Analysis of the actives		
BULK MATERIAL		
Manufacturing records, complete		
Manufacturing records, excerpt		
In-process controls		
Certificate of Analysis bulk		
Certificate of Compliance		
PRIMARY PACKAGING MATERIALS		
Testing certificate		
Safety certificate (with first delivery and each change of supplier)		
FINISHED PRODUCT		
Manufacturing and packaging records, complete		
Manufacturing and packaging records, excerpt		
In-process controls		
Certificate of Analysis		
Certificate of Compliance		