

National Pharmaceutical Regulatory Agency (NPRA) Ministry of Health Malaysia

Lot 36, Jalan Prof. Diraja Ungku Aziz, 46200 Petaling Jaya, Selangor.

Tel. No. : 03-78835400 Website : http://npra.gov.my

GUIDANCE DOCUMENT FOREIGN GMP INSPECTION

9th Edition March 2023

This guidance document is issued in accordance to Regulation 29, Control of Drugs and Cosmetics Regulations 1984.
NPRA Reserves the right to amend any part of the guidance document whichever it deems fit.

TABLE OF CONTENTS

1.0	INTRODUCTION	3
2.0	DEFINITIONS/ABBREVIATIONS	3
3.0	OBJECTIVE	4
4.0	SCOPE	4
5.0	ACCEPTABLE GMP EVIDENCE	5
6.0	GENERAL REQUIREMENTS AND PROCEDURES FOR APPLICATION	6
	PLICATION FOR FOREIGN GMP INSPECTION	
GO	OOD MANUFACTURING PRACTICE DESKTOP ASSESSMENT (GDA)	8
GM	IP DISTANT ASSESSMENT (DIA) - REMOTE INSPECTION (RI)	9
	ANSPORTATION AND ACCOMMODATION	
PR	OCESSING FEE, INSPECTION FEE AND INSPECTION EXPENSES	10
OU	ITCOME OF INSPECTION	11
7.0	REJECTION, TERMINATION OR WITHDRAWAL OF APPLICATION	12
RE.	JECTION	12
TEI	RMINATION	12
8.0	GENERAL ADDITIONAL INFORMATION	13
9.0	FORM	14
10.0	END OF DOCUMENT	14
	PENDIX 1	
API	PENDIX 2	17
API	PENDIX 3	20
RF'	VIEW HISTORY	22

1.0 INTRODUCTION

A company applying with the National Pharmaceutical Regulatory Agency (NPRA) for registration of a medicinal product in Malaysia must provide acceptable evidence to show that the manufacturer of the product follows an internationally accepted standard of Good Manufacturing Practice (GMP) and recognised by the authority in Malaysia.

The Control of Drugs and Cosmetics Regulations 1984 (CDCR) requires that the standard of manufacture and quality control of medicinal products manufactured outside Malaysia be taken into consideration before the products are registered with the authority namely Drug Control Authority (DCA). NPRA as the secretariat to the DCA is responsible for ensuring all manufacturers of registered products in Malaysia are able to provide acceptable evidence that the manufacturing premises conform to current GMP requirements. Hence, foreign manufacturers are also subjected to GMP conformity assessments through acceptable GMP evidence or GMP inspection.

Malaysia became the 26th member of the Pharmaceutical Inspection Co-operation Scheme (PIC/S) since 1st January 2002. Hence, the current PIC/S Guide to GMP for Medicinal Products and its Annexes have been adopted as the standard used by NPRA to assess the GMP conformity of manufacturers.

2.0 DEFINITIONS/ABBREVIATIONS

CAPA Corrective Action and Preventative Action

CDCR Control of Drugs and Cosmetics Regulations 1984

DCA Drug Control Authority

GDA Good Manufacturing Practice Desktop Assessment

GMP Good Manufacturing Practice

DiA Good Manufacturing Practice Distant Assessment

RI Remote Inspection

LIS Listed Inspection Services under the ASEAN Sectoral Mutual

Recognition Arrangement (MRA) on GMP Inspection of

Manufacturers of Medicinal Products

MOH Ministry of Health Malaysia

NDRA National Drug Regulatory Agency

NPRA National Pharmaceutical Regulatory Agency

PIC/S Pharmaceutical Inspection Co-operation Scheme

(Information on PIC/S Participating Authority can be accessed on the

PIC/S website – www.picscheme.org)

PRH Product Registration Holder

SMF Site Master File

VMP Validation Master Plan

3.0 OBJECTIVE

3.1 The objective of the foreign GMP inspection is to assess the conformance of foreign manufacturers to GMP requirements and ensure quality of products that are registered or in the process of registration/re-registration/change of manufacturing site with DCA of Malaysia and products manufactured for clinical trial purposes (investigational medicinal products). This activity is carried out with a view to strengthen the supervision and administration over imported products and foreign manufacturers as well as ensuring quality and safety of the imported products.

- 3.2 The purpose of this guidance is:
 - 3.2.1 To provide information on the types of GMP evidence acceptable to the DCA of Malaysia.
 - 3.2.2 To provide the requirements for an on-site inspection of manufacturing facility outside Malaysia where GMP evidence of the premise is not available or acceptable to the DCA of Malaysia.
 - 3.2.3 To provide guidance on how to apply for an on-site foreign GMP inspection, the eligibility and application for GMP Desktop Assessment (GDA) for foreign manufacturers previously inspected by NPRA.

4.0 SCOPE

4.1 This guidance applies to all manufacturers of pharmaceutical products, which currently include products in the following categories: new drug products, biologics, generic products (scheduled and non-scheduled poisons), and sterile veterinary products located outside Malaysia.

5.0 ACCEPTABLE GMP EVIDENCE

- 5.1 One of the requirements to register an imported medicinal product in Malaysia is submission of acceptable documentary evidence of the GMP compliance of the manufacturer issued by a regulatory authority.
- 5.2 For pharmaceutical product, the requirement for GMP evidence submission are laid down in the following directives issued by the Director Pharmaceutical Services:
 - 5.2.1 Bilangan 1 Tahun 2012 Direktif Mengenai Syarat Pendaftaran Produk Farmaseutikal Dari Luar Negara Berkaitan Keperluan Amalan Perkilangan Baik (APB).
 - 5.2.2 Bilangan 1 Tahun 2016 Direktif Mengenai Keperluan Pemeriksaan Amalan Perkilangan Baik (APB) Luar Negara Bagi Tujuan Pendaftaran/ Pendaftaran Semula Produk Farmaseutikal Berdaftar dengan Pihak Berkuasa Kawalan Dadah (PBKD).
 - 5.2.3 Bilangan 11 Tahun 2016 Direktif Mengenai Penerimaan Pengesahan Pematuhan Amalan Perkilangan Baik (APB) Bagi Tujuan Pendaftaran Semula Produk Farmaseutikal Berdaftar dengan Pihak Berkuasa Kawalan Dadah (PBKD).
 - 5.2.4 Bilangan 4 Tahun 2018 Direktif Mengenai Penerimaan Pengesahan Pematuhan Amalan Perkilangan Baik (APB) Bagi Pengilang Farmaseutikal Bagi Tujuan Pendaftaran Baru/ Pendaftaran Semula Produk Farmaseutikal Berdaftar dengan Pihak Berkuasa Kawalan Dadah (PBKD).
 - 5.2.5 Circular Letter Ref. No. NPRA-600-1/9/12 (7) dated 11 February 2021 Pekeliling Berkenaan Pelaksanaan Prosedur Kerja Penilaian Desktop Bagi Aktiviti Pemeriksaan Amalan Perkilangan Baik (APB) Ke Atas Premis Pengilang Farmaseutikal Luar Negara.
 - (Directives accessible from NPRA website http://npra.gov.my)
- 5.3 Based on the directives listed above, starting 1st of July 2018;
 - 5.3.1 For pharmaceutical manufacturer **located on a site within jurisdiction of a PIC/S Participating Authority, GMP** evidence issued by the local NDRA is accepted.
 - 5.3.2 For pharmaceutical manufacturer **located in an ASEAN member country**, GMP evidence issued by the local NDRA is accepted if the NDRA is included as a Listed Inspection Service under the ASEAN Sectoral Mutual Recognition Arrangement (MRA) for GMP Inspection of Manufacturers on Medicinal Products.

- 5.3.3 For pharmaceutical manufacturer **not located on a site within jurisdiction of a PIC/S Participating Authority**, GMP evidence issued by the following NDRA is accepted:
 - any PIC/S Participating Authority
 - any NDRA that has a cooperation agreement such as Mutual Recognition Agreement (MRA) with PIC/S.
- 5.4 Apart from the GMP Evidence's issuing body, the documentary evidence provided must:
 - 5.4.1 Have a validity period that is still current,
 - 5.4.2 Provide the correct manufacturer's name and address of manufacturing site,
 - 5.4.3 Specify the dosage form class OR the facility used to manufacture the dosage form was covered during the inspection.
- 5.5 The GMP evidence submitted shall be in the format of:
 - 5.5.1 GMP Certificate
 - 5.5.2 GMP Inspection Report
- 5.6 Where acceptable GMP evidence of the foreign manufacturer is not available or the documentation submitted is insufficient to demonstrate acceptable GMP standard, a GMP inspection shall be conducted by NPRA.
- 5.7 Submission of acceptable GMP evidence does not guarantee that GMP inspection will not be conducted by NPRA on the foreign manufacturer.
- 5.8 Foreign manufacturers who have been inspected by NPRA and have valid acceptable GMP status (3 years after the last inspection) may be eligible for GDA beginning in April 2021. This allows foreign manufacturers to extend their GMP status in order to facilitate the continuous regulatory process for new registration and renewal of medicinal products in Malaysia only. NPRA will not issue any GMP certificate for this purpose.

6.0 GENERAL REQUIREMENTS AND PROCEDURES FOR APPLICATION

APPLICATION FOR FOREIGN GMP INSPECTION

6.1 The application for a foreign GMP inspection should be made by a Malaysian registered company (PRH) acting on behalf of the foreign manufacturer.

- 6.2 The Malaysian registered company (PRH) shall authorise a responsible person (e.g. Chief Executive Officer, Managing Director or Regulatory Manager) to act as the liaison officer with NPRA for all arrangements pertaining to the proposed inspection.
- 6.3 The appointed liaison officer responsible for the application is required to submit the completed application form (NPRA/431/11) with the processing fee of RM 5,000 and these documents:
 - 6.3.1 A copy of Company/Business Registration Certificate (for PRH)
 - 6.3.2 List of Building/Workshop/Line/Unit and dosage forms manufactured in each Building/Workshop/Line/Unit to be inspected.
 - 6.3.3 Details of new products to be registered in Malaysia and/or existing registered products of renewal of product registration and/or existing registered products for change of manufacturing site
 - 6.3.4 Site Master File
 - 6.3.5 Validation Master File
 - 6.3.6 Proposed flight route, including connecting flights (if any)
 - 6.3.7 Hotel quotation [Name of hotel, hotel rate per night, hotel's official website, distance between hotel and manufacturing facility, accommodation during transits (if any)]
 - 6.3.8 Entry requirements to the destination country for Malaysian citizens.
 - 6.3.9 Declaration letter from Manufacturer stating that premise is ready to be inspected at any time.
 - 6.3.10 Valid GMP Evidence (preferably GMP certificate/report issued by a PIC/S Participating Authority)
- 6.4 Any changes to the information on application form must be notified in writing within one of week of application submission.
- 6.5 If the application is successful, NPRA will write to the applicant and announce the proposed date, duration of inspection and estimated cost for inspection.
- 6.6 Prior to conducting the inspection, a meeting will be organized between the appointed GMP inspectors and the applicant for a preparation of the inspection.
- 6.7 If the foreign manufacturer is also manufacturing registered products for other PRH, the applicant must ensure that all the other PRH are aware and understand that the outcome of the GMP inspection may affect the registration status of all the products manufactured at this facility.

- 6.8 Applicant must undertake the responsibility to ensure that application for new product / dosage form registration is submitted to Centre for Product and Cosmetic Evaluation after submission of foreign GMP inspection application. Applicant must ensure that the application has been submitted for the screening process for new product / dosage form prior to inspection.
- 6.9 Screening for new product registration will only be accepted for evaluation if the applicant has provided proof of successful payment of the inspection fee of **RM 20,000.00**.
- 6.10 Failure to ensure the submission of product registration application prior to the inspection may result in cancellation of the application.

GOOD MANUFACTURING PRACTICE DESKTOP ASSESSMENT (GDA)

- 6.11 GDA is a process to extend the status of GMP for eligible foreign manufacturers, for the purpose of registration and/or registration renewal of medicinal products in Malaysia. The criteria for eligible application are:
 - Manufacturing sites inspected by NPRA previously with an acceptable GMP status for the same dosage form(s)
 - Applicable for sterile and non-sterile facilities (excluding biopharmaceuticals)
 - Application of NPRA/431/11 is submitted at least 1 year before the expiry of GMP status (3 years after the last inspection date)
- 6.11 For every NPRA/431/11 application received, NPRA will evaluate them for GDA eligibility. If eligible, PRH will be duly informed for further action. This is further explained in Process Flow for GMP Foreign Inspection (**Appendix 1**).
- 6.12 Currently, there is no additional processing fees imposed for eligible application. However, upon unsatisfactory GDA, the foreign manufacturers will be subjected to an on-site inspection. The scheduling of the inspection will be based on the date of complete NPRA/431/11 application received by NPRA.
- 6.13 Upon satisfactory GDA, the GMP status validity will be extended for the next two years. For every on-site inspection, the foreign manufacturer may apply for GDA up to two times consecutively. For example, the last inspection conducted on 01/12/2017 will expire on 30/11/2020. With satisfactory GDA (first time), the GMP status will be extended to 30/11/2022. Then, PRH may apply for another GDA which due in 2021, in which a satisfactory GDA (second time) will be further extended to 30/11/2024. This process is further illustrated in **Appendix 2** of this document.

GMP DISTANT ASSESSMENT (DIA) - REMOTE INSPECTION (RI)

- 6.14 Starting from 1st of September 2021, Distant Assessment (DiA) which consist of Remote Inspection (RI) will commence whereby it will replace on-site foreign GMP inspection during the COVID-19 pandemic when border closure/travel restrictions are still in place.
- 6.15 On-site foreign GMP inspection will resume once COVID-19 pandemic had subsided.
- 6.16 This work process is only applicable to all foreign GMP inspection application (NPRA/431/11) pending for on-site inspection.
- 6.17 Foreign manufacturers eligible for GMP Desktop Assessment (GDA) work process are excluded from DiA as the GMP status of the manufacturer shall be confirmed following the completion of GDA.
- 6.18 Remote Inspection includes documentation review followed by virtual inspection in which:
 - Documentation (e.g., filing commitments, site description, and key procedures) is requested by GMP inspector(s) for further evaluation. Requests and responses to questions are shared in written form (e.g., via email or on a document-sharing platform).
 - In addition to sharing documentation, virtual inspection utilizes technologies such as live or real-time streaming video, screen-sharing, or other means of real-time communication. Virtual inspection may include virtual tour of aspects of the manufacturer, video communication and interview.
- 6.19 The payments involved with DiA work process includes Processing Fee and Inspection Fee are as mentioned in para 6.23.1 & 6.23.2. Kindly note that both the fees are non-refundable under any circumstances.
- 6.20 For further information regarding Remote Inspection, kindly refer to Frequently Asked Questions (FAQs) on Foreign Good Manufacturing Practice (GMP) Inspections by NPRA during COVID-19 Pandemic through the following link: https://www.npra.gov.my.

TRANSPORTATION AND ACCOMMODATION

- 6.21 Travelling arrangement includes both ground travel and air travel. The applicant is expected to propose a suitable travel itinerary to NPRA (as reference) based on the following criteria:
 - Preferred airline is Malaysian Airline (MAS);

- Flight is normally of the shortest distance from Kuala Lumpur to the point of destination and without transit. If transit is required due to unavailability of routes;
- The details of the transit destination and duration should be included;
- Flight class is Economy Class, with fare structure allowing for change of flight date and time without any penalty or charge;
- Arrangement of ground transportation (if any).
- 6.22 The information on accommodation will be required in the form of an official quotation or similar and satisfy the following criteria:
 - Hotel details and room category as Standard Room;
 - Reasonable distance between the hotel and manufacturing facility (Please state the estimated duration to reach the manufacturing facility from the hotel).

PROCESSING FEE, INSPECTION FEE AND INSPECTION EXPENSES

- 6.23 The payment structure for foreign GMP inspection consist of three parts, in which all shall be borne by the applicant as follows:
 - 6.24.1 Processing Fee (includes on-site, GDA & DiA):
 - Payment of a processing fee of RM 5,000.00 upon application.
 - The processing fee is non-refundable.
 - 6.24.2 Inspection Fee (only for on-site inspection & DiA):
 - Payment of an inspection fee of RM 20,000.00 upon issuance of invoice by NPRA.
 - NPRA will issue an invoice to the company once inspection date is confirmed.
 - Payment of the inspection fee must be made at least one (1) month before the foreign inspection is conducted.
 - The payment shall be made using a bank draft / postal order payable to:

Name: BIRO PENGAWALAN FARMASEUTIKAL KEBANGSAAN, KEMENTERIAN KESIHATAN MALAYSIA

• The inspection fee is non-refundable under any circumstances.

6.24.3 Inspection Expenses (only for on-site inspection):

- The inspection expenses will cover all the expenses incurred to conduct the inspection. These include flight ticket, accommodation and other associated expenses (such as allowances, insurance, etc.)
- The inspection expenses costing will be prepared by NPRA based on the eligibility of the inspectors as outlined in the Treasury Circular issued by the Malaysian Ministry of Finance.
- NPRA will calculate the inspection expenses using the information obtained from the applicant and inform the applicant accordingly.
- Payment for the inspection expenses shall be in the form of contribution to a trust fund established under the Malaysian Ministry of Health (MOH) namely Akaun Amanah Penilaian, Pengiktirafan Akreditasi dan Pemeriksaan APB (Main Code: 886341, Sub Code: 4001) through a <u>banker's cheque</u> made payable to:

Name : KETUA SETIAUSAHA KEMENTERIAN

KESIHATAN MALAYSIA

Account No : 21401360003459

- In the event where foreign GMP inspection was conducted, remainder of the inspection expenses will be retained in the trust fund for future purposes as outlined in the Arahan Amanah Penilaian, Pengiktirafan Akreditasi dan Pemeriksaan APB.
- The inspection expenses will be refunded in the event where foreign GMP inspection cannot be conducted.

OUTCOME OF INSPECTION

6.25 The outcome of the GMP inspection will be tabled to the *Jawatankuasa Penilaian Pemeriksaan Premis dan Kajian (JKPPPK)* [Committee for the Evaluation of Premises and Research Inspection (CEPRI)].

- 6.26 GMP inspection report will be issued to manufacturer through applicant e.g. PRH for onsite inspection and DiA in which the type of inspection conducted will be clearly mentioned. Meanwhile, for GDA, an official letter with the outcome of GDA will be issued.
- 6.27 For the on-site inspection and DiA, manufacturer may be required to submit a Corrective Action and Preventative Action (CAPA) report to NPRA for the non-compliances reported during the inspection within the time frame specified in the GMP report cover letter. The CAPA report will be presented to the JKPPPK for further consideration.
- 6.28 GMP compliance status will only be concluded as acceptable when the actions outlined in the CAPA are considered satisfactory in addressing the non-compliances and the time frame needed to close all CAPA is not more than 6 months from the date of inspection report issuance. If more than 6 months is required, the GMP compliance status will be concluded as unacceptable.
- 6.29 After the GMP compliance status is concluded as acceptable, the applicant may apply for a GMP certificate for the foreign manufacturer. The certificate shall be used administratively for product registration/re-registration/change of manufacturing site purposes with NPRA. This, however, is not applicable for GDA, whereby there will be no GMP certificate issued upon satisfactory GDA.
- 6.30 GMP certificate issued shall clearly specify the type of inspection (either on-site or RI inspection). The GMP validity for on-site inspection is 3 years and RI is 2 years.
- 6.31 For inspection whose GMP compliance is concluded as unacceptable, the manufacturer is not required to submit a CAPA report as there will be no further consideration or appeal for the GMP compliance status of the manufacturer. Applicant is required to submit a new application for NPRA to conduct another inspection on the manufacturing facility.

7.0 REJECTION, TERMINATION OR WITHDRAWAL OF APPLICATION

REJECTION

7.1 NPRA has the right to reject an incomplete application for example an application without supporting documents as mentioned in para 6.3 above.

TERMINATION

- 7.2 The application shall be terminated if payment of inspection fee is not made at least 1 (one) month before the foreign inspection is conducted.
- 7.3 The estimated date of the inspection will be proposed by NPRA during the evaluation stage, upon receipt of a completed application form (NPRA/431/11). The applicant and

- foreign manufacturer are responsible to make sure the premise is fully prepared and not under renovation or any other condition that may affect the GMP inspection conducted.
- 7.4 The applicant shall submit in writing, explaining the reason, to NPRA if there is a reason for postponing the inspection after the date of inspection has been confirmed.
- 7.5 NPRA has the authority to terminate the application if the applicant is not able to comply with the proposed date due to unavailability or unpreparedness of facility. Failure to commit to the inspection after confirmed inspection date will result in application rejection and the processing fee is not refundable.
- 7.6 An application may also be terminated if it fails to fulfil the requirement outlined in para 6.8.
- 7.7 Application which has been terminated or rejected will go through the submission process once again as stated in para 6.0.
- 7.8 The applicant shall notify NPRA regarding withdrawal of application or any other changes in writing.
- 7.9 In cases where application is withdrawn/terminated/rejected after payment for the inspection expenses has been made to the trust fund, applicant may request for a refund. Request for refund can be made through an official letter to Centre for Compliance and Quality Control together with proof of payment (payment receipt) as well bank account details. Applicant is advised to request for refund within thirty (30) days of withdrawal.
- 7.10 The applicant is solely responsible to ensure all documents are complete during submission for GDA. In the event of incomplete, missing documentation or unable to provide requested document within specific timeline, the GDA process may be terminated, leading to a decision to conduct on-site inspection.

8.0 GENERAL ADDITIONAL INFORMATION

- 8.1 The GMP inspection is subject to final approval by the Ministry of Health Malaysia.
- 8.2 The applicant shall arrange for adequate number of translators to be present during the on-site inspection, at the company's cost, if English or Bahasa Malaysia is not the language used in communication and documentation by the foreign manufacturer.
- 8.3 The applicant shall assign an individual from the PRH to accompany the GMP inspectors during the whole duration of the inspection.
- 8.4 The manufacturer must ensure that any translated version of the documentation that is provided to the GMP Inspector during the inspection is clear, legible, accurate and in an official manner in line with the manufacturers documentation system.

- 8.5 The manufacturer shall operate and run production activities as usual during the inspection.
- 8.6 The number of inspectors appointed, and duration of inspection will be decided by NPRA depending on the nature of the products, size of premise and scope of inspection. In most circumstances, the minimum number of the inspectors are 3 and for a minimum duration of 3 days.
- 8.7 Inspections are limited to one inspection per site for either sterile or non-sterile facility. Inspections of multiple sites or to both sterile and non-sterile or to both biologics [drug product (DP) and drug substance (DS)] facilities will require separate applications.
- 8.8 NPRA adopts the PIC/S Guide to GMP for Medicinal Products and its annexes for the GMP inspection.
- 8.9 NPRA reserves the right to invalidate the GMP certificate issued to the manufacturer when evidence exists (such as product complaints, serious adverse events, etc.) or have reason to believe that the manufacturer is not complying with the GMP guidelines/requirements.
- 8.10 The same GMP certificate or GDA satisfactory status may be used by the same applicant for other product registration applications if the scope of manufacture is the same, provided the validity date of the GMP certificate or GDA is still current.
- 8.11 An acceptable GMP compliance of a manufacturer does not guarantee the manufactured product will be approved for registration in Malaysia.
- 8.12 Inquiries relating to foreign GMP inspection may be directed to the following contact:

Centre for Compliance and Quality Control National Pharmaceutical Regulatory Agency Ministry of Health Malaysia Lot 36, Jalan Profesor Diraja Ungku Aziz, 46200 Petaling Jaya, Selangor.

Tel: (60)-378835400

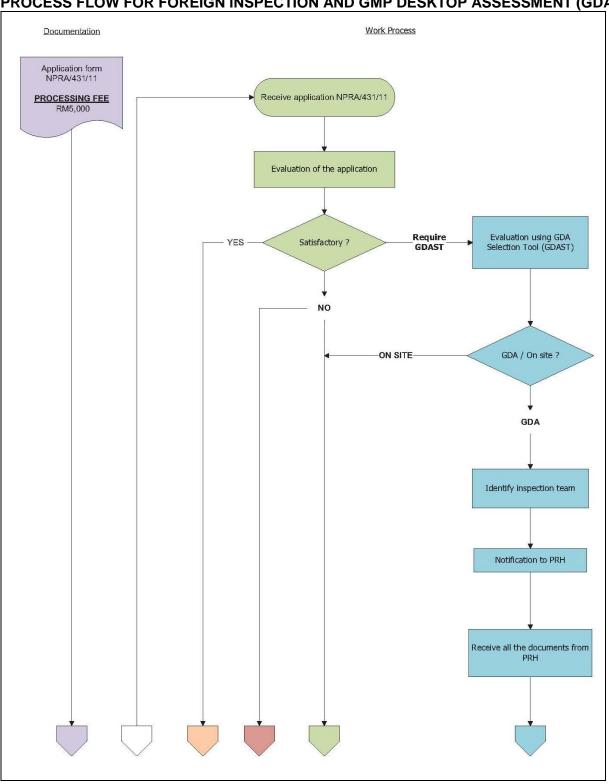
9.0 **FORM**

NPRA/431/11 - Foreign GMP Inspection Application Form (downloadable via NPRA website – http://npra.gov.my.)

10.0 END OF DOCUMENT

APPENDIX 1

PROCESS FLOW FOR FOREIGN INSPECTION AND GMP DESKTOP ASSESSMENT (GDA)



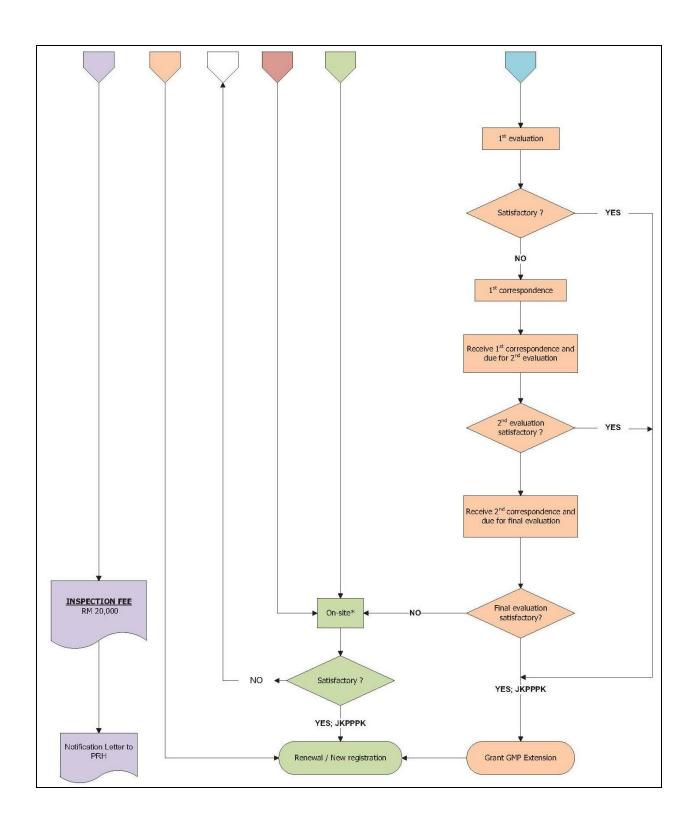
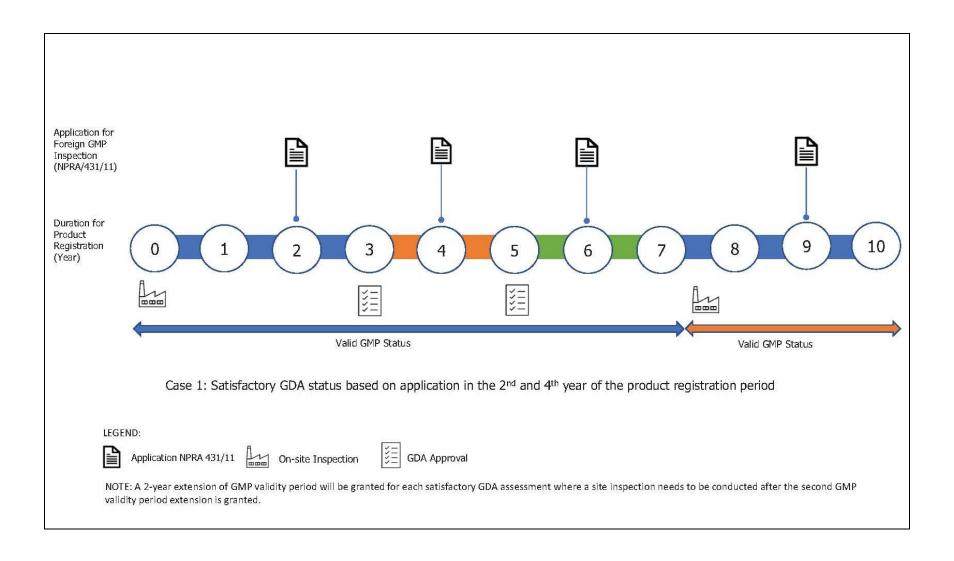
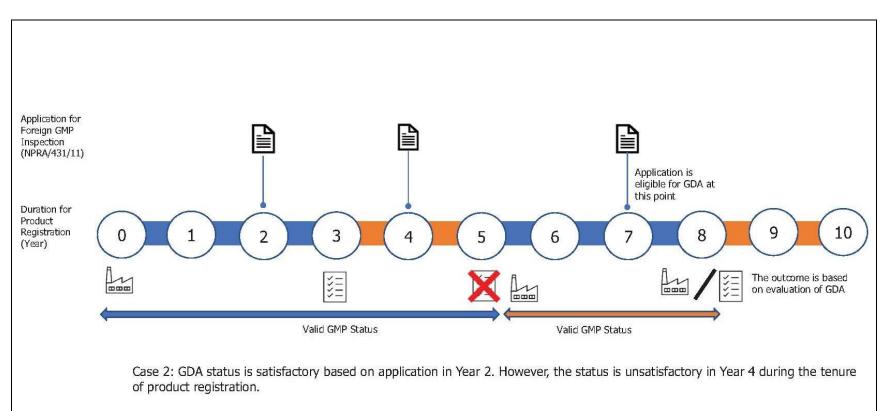


ILLUSTRATION OF GDA EXTENSION (3 CASES)









Application NPRA 431/11

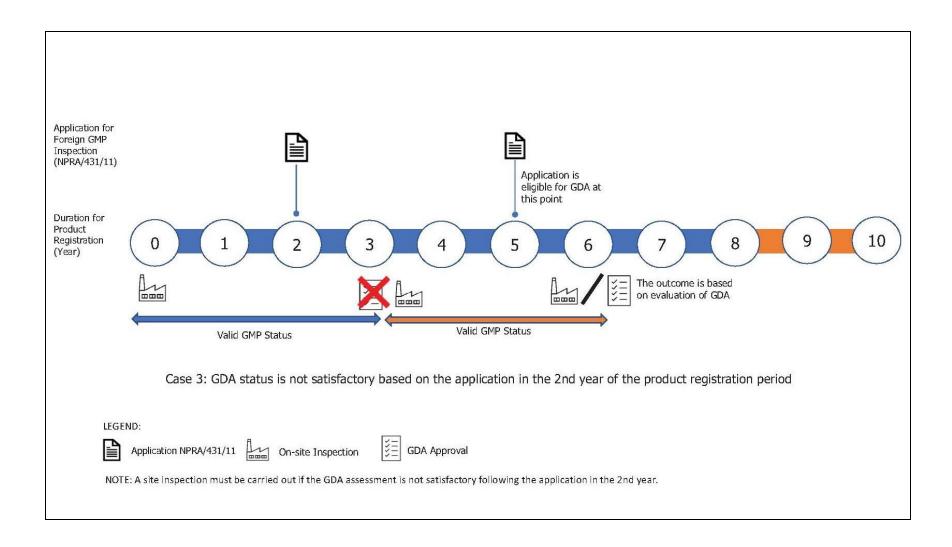


On-site Inspection



GDA Approval

NOTE: A site inspection must be carried out if the GDA assessment is not satisfactory following the application in the 4th year.



Description for Pre-Assessment of GDA

No.	GDA Parameters of Pre- assessment	Categories	Description
1.	Number of employees.	 more than 150 employees 50 – 150 employees less than 50 employees 	The total number of manufacturing personnel (permanent) – including QA, QC and Warehouse.
2.	The maximum number of different processes from manufacturing to distribution process that are in use at the site	 More than 7 processes 4 – 6 processes 1 – 3 processes 	The maximum total number of manufacturing up to distribution processes for different dosage forms (number of dosage forms). Larger numbers generally give rise to more complexity.
3.	The level of dedication of equipment and facilities that is in place at the site (e.g.: No dedication, partial dedication, full dedication).	 No dedication Partial dedication Full dedication 	Dedication of facility for different dosage form / category of products. No dedication indicates all manufacturing processes using the same equipment and utilities. Example: manufacturing of general products. Whereas, full dedication may indicate different equipment and utilities are used to manufacture different category of products, such as soft gel that is sensitive to humidity. Campaign manufacturing considered partial dedication. Other than that, for a manufacturing site consists of a totally dedicated block for Penicillin / Cephalosporin and another block that manufactures steroid by campaign, it is considered partial dedication. Hence, manufacturing block with less dedicated area will take precedence over the total dedicated area.
4.	Involvement of Real Time Release Testing (RTRT)	 Real Time Release Testing (RTRT) activities No Real Time Release Testing (RTRT) activities 	Any Real Time Release Testing (RTRT) is practiced by the manufacturer. Kindly refer to the latest Annex 17 PIC/S GMP Guide.
5.	Complexity of products manufactured	Complex product type (low concentration / high potency, sustained release, biological)	Complex products are being manufactured such as highly potent product that may require special

No.	GDA Parameters of Pre- assessment	Categories	Description
		Normal product Repacking only	manufacturing / storage requirement.
6.	The maximum number of unit operations in a non-sterile manufacturing process (e.g.: dispensing, mixing, granulate, drying, coating, blister, packing, testing, IPQC)	 More than 6 processes 4 – 5 processes Less than 3 processes 	The total number of each process within the manufacturing process for the intended product Example: Dispensing – Blending – Milling – Drying – Tableting – Coating – Blistering are considered as 7 units of operation for manufacturing processes.
7.	Involvement of repackaging activities (e.g.: primary, secondary).	 Packing of products for clinical trials, primary repack Secondary repack No repack activities 	For the intended product
8.	Engagement of sub- contract activities (e.g.: contract lab, transport). Can tick more than one	 Subcontracting of processes / stages of manufacturing, primary packaging and QC Subcontracting services: contract lab, transport etc. No subcontracting 	
9.	The maximum number of components in a product, include final pack (e.g.: vial, diluent, syringe, leaflet).	 More than 4 components 2 - 3 components 1 component (primary packaging) 	For the intended product. For example, a pack of a tablet product may have a blister strip and a patient information leaflet within it which is considered 2 components.
10.	Any product with specific storage requirement. Can tick more than one	 Cold chain, shorter shelf life Specified storage requirement No specific storage requirement 	

REVIEW HISTORY

VERSION	REVIEW DATE	DESCRIPTION OF REVIEW
7	25/01/2021	 Include the Review History Update term 'Centre for Compliance and Licensing' to 'Centre for Compliance and Quality Control' Update term 'Centre for Product Registration' to 'Centre for Product and Cosmetic Evaluation' Update NPRA address to Lot 36, Jalan Profesor Diraja Ungku Aziz Update telephone number to 03-7883 5400 Include term 'GDA - Good Manufacturing Practice Dekstop Assessment' Revise para 3.2.3 to add 'the eligibility and application for GMP Desktop Assessment (GDA) for foreign manufacturers previously inspected by NPRA.' Include new circular under para 5.2 - Circular Letter Ref No. NPRA-600-1/9/12 (7) dated 11 February 2021 - Pekeliling Berkenaan Pelaksanaan Prosedur Kerja Penilaian Desktop Bagi Aktiviti Pemeriksaan Amalan Perkilangan Baik (APB) Ke Atas Premis Pengilang Farmaseutikal Luar Negara. Additional para 5.8, 6.8, 6.10, 6.11, 6.12, 6.13, 6.17, 6.18. Revise para 6.21 to add 'This, however, is not applicable for GDA, whereby there will be no GMP certificate issued upon satisfactory GDA.
8	17/08/2021	 Removal of fax number from cover page. Alignment adjustment throughout the document. Update Table of Contents under item 6 with 'Good Manufacturing Practice Distant Assessment (DiA)'. Include term 'DiA - Good Manufacturing Practice Distant Assessment' and 'RI - Remote Inspection' under 2.0 Definitions/Abbreviations. Addition of para 6.14 - 6.20. Revise para 6.23.1 from 'includes GDA' to 'includes on-site, GDA & DiA'. Revise para 6.23.2 from 'only for on-site inspection' to 'only for on-site inspection & DiA'. Revise para 6.25 and 6.26 to add in 'and RI'. Addition of para 6.29.
9	20/02/2023	1. Revise para 6.17 from 'BPFK-501' to 'NPRA/431/11'.

VERSION	REVIEW DATE	DESCRIPTION OF REVIEW
		2. Revise para 6.3 from 'BPFK-501' to 'NPRA/431/11' and amend
		list of supporting documents.
		3. Revise para 6.11 to 6.13 from 'BPFK-501' to 'NPRA/431/11'.
		4. Revise para 6.8 to 'Applicant must ensure that the application
		has been submitted for the screening process for new product / dosage form prior to inspection.'
		5. Added para 6.9 to 'Screening for new product registration will
		only be accepted for evaluation if the applicant has provided
		proof of successful payment of the inspection fee of
		RM20,000.00.'
		6. Revise para 7.3 from 'BPFK-501' to 'NPRA/431/11'.
		7. Change the application form number under item 9.0 Forms from 'BPFK-501' to 'NPRA/431/11'.
		8. Revise Appendix 1 and Appendix 2 from 'BPFK-501' to 'NPRA/431/11'.
		9. Revise Para 4.1 to 'This guidance applies to all manufacturers
		of pharmaceutical products, which currently include products in
		the following categories: new drug products, biologics, generic
		products (scheduled and non-scheduled poisons), and sterile veterinary products located outside Malaysia.'