

2022

MSF
International

MSF QUALIFICATION PROCESS FOR MEDICINES



1. GENERAL PRINCIPLES

“The qualification of the medicines is an essential part of the quality assurance. It verifies that the products meet at least the norms and standards set by international organizations” WHO PRE-QUALIFICATION

2. OBJECTIVE

The aim of the MSF Qualification Process for medicines is to detail the principles for the assessment of the acceptability of pharmaceutical products purchased internationally by the MSF supply centers.

3. THE EVALUATORS

The evaluation work is essentially carried out by MSF Headquarters Pharmacists based in the supply centers procuring internationally and the International Office, coordinated by the International Pharmacist Coordination. External experts are consulted and/or contracted for specific parts of the evaluation (e.g. Good Manufacturing Practice (GMP) audits, active pharmaceutical ingredients specifications, bio equivalence studies, etc.)

4. PRINCIPLES

The MSF qualification process is based on a principle of mutual trust. The manufacturer is asked to certify the veracity and accuracy of the information and documents submitted to MSF.

Mistakes or omissions (intentional or not) may lead to the disqualification of the product and/or the manufacturer.

The MSF qualification process is neither intended to interfere with the WHO pre-qualification initiative, nor to duplicate any existing work (GMP inspections, product evaluations) carried out by stringent National Drug Regulatory Authorities. Therefore,

- any WHO pre-qualified medicine that is included in the MSF List of Medicines is automatically qualified by MSF
- any medicine registered in a highly regulated country that is included in the MSF List of Medicines, is automatically qualified by MSF. USFDA tentative approvals and EMA article 58 are also automatically qualified.
- Expert Review Panel (ERP)-reviewed pharmaceutical products risk category 1 and 2 as made publicly available by the organization coordinating the ERP (Global Fund to fight AIDS, tuberculosis and malaria (GFATM), WHO NTD dept., UNICEF, UNFPA, etc.) can be automatically qualified if needed, but as a last purchasing choice only.
- any other medicine should be qualified through the qualification process described below.

MSF is not a Medicines Regulatory Agency. The MSF qualification process has been exclusively designed for the organization and the decisions taken are only valid for MSF.

The MSF qualification process is based on internationally recognized principles and built on two pillars:

- The manufacturing site GMP assessment
- The pharmaceutical product dossier assessment

The norms and standards that underline the MSF quality process are:

- Those published by the WHO (GMP guidelines, Technical Report Series)
- The WHO International Pharmacopoeia, the European Pharmacopoeia, The British Pharmacopoeia and the United States Pharmacopoeia
- The MSF specifications for pharmaceutical products, based on international standards

The MSF qualification process is open to any manufacturer regardless of their country of operation.

5. STEPS IN THE QUALIFICATION PROCESS

- Expression of interest
- Screening and evaluation of Manufacturer Information File
- GMP assessment of the manufacturing site (through an audit or a technical visit)
- Final decision on the evaluation of the manufacturing site(s)
- Request and submission of pharmaceutical product dossier
- Evaluation of pharmaceutical product dossier
- Result of the evaluation of the product dossier (product-manufacturer couple qualified or not)
- Monitoring and follow-up

5.1. Expression of interest

Any manufacturer who wishes to participate to the MSF qualification process with a medicine included in MSF medicines list is invited to express their interest by filling in the "Manufacturer Information File" (MIF).

The manufacturer should send the MIF and requested annexes to the MSF International Office, by e-mail or by post using the following address:

Assistant to QA coordinator
Rue de l'Arbre Bénit 46
1050 Brussels
Belgium

QA-Coordination-Assistant@msf.org

An acknowledgement of receipt will be sent in return to the manufacturer.

5.2. Screening and evaluation of the Manufacturer Information File

Each file submitted by a manufacturer is first screened for completeness.

Special attention will be paid to the list of products submitted by the manufacturer as an annex to the MIF. The evaluation procedure will only be initiated for manufacturers who produce pharmaceuticals that match with MSF interests.

5.3. GMP Assessment of the manufacturing site

5.3.1. TECHNICAL VISIT OF THE MANUFACTURING SITE

GMP inspections carried out by the WHO PQ inspectors, or Inspectorates recognised by MSF are taken into consideration by MSF.

A technical visit occurs when sites already found GMP compliant after a WHO PQ or an MSF recognised inspectorate inspection are visited by an MSF HQ pharmacist.

A "technical visit" is not a full GMP audit. It is usually shorter and designed to make sure that the products of potential interest for MSF are actually manufactured on the approved premises.

5.3.2. AUDIT OF THE MANUFACTURING SITE

For facilities that have not been previously inspected and approved by WHO PQ or an SRA inspectorate, the MSF International Pharmacists Coordinator will appoint a GMP expert to perform an audit. Audits are carried out against the WHO GMP guidelines.

The auditor writes a report on the findings of the audit that is sent to the manufacturer.

If any additional information is required or corrective action has to be taken by the manufacturer, MSF pharmacists will postpone their final conclusions until the additional information and corrective actions have been evaluated by the auditor and/or the MSF pharmacists.

5.4. Final decision on the evaluation of the manufacturing site

On the basis of the conclusions of the technical visit or audit, the MSF International Pharmacists Coordinator will inform the manufacturer in writing of the outcome of the evaluation which can be:

- The site is approved by MSF
- The site is NOT approved by MSF
- A new audit is needed. In this case, a tentative schedule is proposed to the manufacturer. The decision to approve (or not) the manufacturing site is postponed until the outcome of the re-audit has been evaluated by the MSF pharmacists.

5.5. Request and submission of pharmaceutical product dossier

Manufacturers with at least one MSF approved manufacturing site will be asked to submit detailed technical information on the products that present an interest to the organization. The MSF pharmacists will provide the approved manufacturer with an electronic formatted copy of the Inter Agency Product Questionnaire (IAPQ).

The IAPQ is a tool that has been developed by the MSF pharmacists in collaboration with the UNICEF Supply Division, the WHO Procurement Department, WHO Pre-Qualification, the International Committee of the Red Cross, The Global Fund and UNFPA.

The approved manufacturer will submit the questionnaire to MSF together with the requested annexes and a sample of the product concerned. All the information should be submitted in English.

Questionnaires that are not complete will not be considered for evaluation. In this case, the manufacturer will be informed that the questionnaire is incomplete and will be given a deadline to complete it. If the manufacturer is not able to submit the complementary information within the given schedule, the product dossier will be rejected.

5.6. Evaluation of the pharmaceutical product dossier

Key indicators of the quality assurance of a product are assessed:

1. Status of registration by National Drug Regulatory Authority (NDRA) in the country of origin
2. Sample (dosage form packaging and labelling)
3. Active Pharmaceutical Ingredient (API) Quality Assurance
4. Manufacturing site WHO GMP level of compliance
5. Finished Pharmaceutical Product (FPP) specifications
6. Stability studies on the finished pharmaceutical product
7. Therapeutic equivalence, if appropriate.

A rating is given for the first six indicators. This rating reflects the level of compliance (1 = poorly compliant, 6 = fully compliant) of each indicator with the MSF standards and specifications.

	REGULATORY/ MARKETING STATUS	SAMPLE/ PACK/ LABELLING.	API QA	MFG SITE GMP	FP ANALYTICAL REFERENCE	STABILITY
6	REGISTERED and MARKETED in the country of origin	Fully compliant with MSF specifications TRILINGUAL LABEL	CEP OR WHO PQ	SATISFACTORY GMP INSPECTION	PHARMACOPOEIA BP/US/Int. Ph. + Additional tests	Satisfactory zone 4 A or B
5		Compliant with MSF specifications BILINGUAL LABEL	DMF US OR TF provided with additional tests	SATISFACTORY GMP AUDIT (product oriented)	PHARMACOPOEIA BP/US/Int. Ph.	
4		Compliant with MSF specifications ENGLISH ONLY	TF provided	SATISFACTORY GMP AUDIT (not product oriented)	EQUIVALENT METHODS	Satisfactory zone 2
3	REGISTERED BUT NOT MARKETED in the country of origin	MINOR DEFICIENCIES	CoAs and GMPc provided		IN-HOUSE	Temporarily acceptable
2	NOT REGISTERED in the country of origin	MAJOR DEFICIENCIES	MAJOR DEFICIENCIES	FOLLOW-UP NEEDED	IN HOUSE < BP/USP/Int.Ph.	MAJOR DEFICIENCIES
1		CRITICAL DEFICIENCIES	CRITICAL DEFICIENCIES	NON COMPLIANT	CRITICAL DEFICIENCIES	CRITICAL DEFICIENCIES

Any rating lower than three means that the product cannot be qualified for MSF.

Therapeutic equivalence

No rating is given for therapeutic equivalence (TE), but the status of compliance is checked before requesting the dossier. The need for in vivo equivalence studies or the qualification for a biowaiver is evaluated for each product on the basis on the following WHO documents:

- ["Guidelines on registration requirements to establish interchangeability"](#)
- ["Proposal to waive in vivo bioequivalence requirements for WHO Model List of Essential Medicines immediate release, solid oral dosage forms"](#) (WHO Technical Report Series 937, annexes 7& 8)

5.7. Result of the evaluation of the product dossier

The International Pharmacists Coordination will do the final review of the product dossier and decide about the outcome of the evaluation:

The product is compliant with MSF requirements and specifications

The product is NOT compliant

In the first case:

- The pharmacist in charge of the dossier informs the manufacturer in writing that the product is approved by MSF
- The details of the approved product are summarized in a Product Specification Sheet (PSS) that is sent for signature to the manufacturer as a commitment to supply MSF with a product according to the approved specifications
- It is only after reception of the signed PSS that the product is considered to be "MSF qualified"
- Following the qualification of a product, the commercial negotiation can start with the European Supply Centers

In the second case:

- The manufacturer is informed that its product does not meet MSF requirements and specifications and therefore cannot be approved.

5.8. Monitoring and follow up

MSF site approvals are monitored based on risk assessment with a new audit scheduled within 2-5 years.

Recent satisfactory WHO PQ/SRAs inspections are taken into consideration for the renewal of a GMP approval.

The MSF qualification of a product is usually valid for a period of 5 years.

During the period of validity of a qualification, the manufacturer is asked to advise MSF promptly of any changes in the manufacture or specifications of the product. Details of the change are declared in a variation form which the manufacturer is requested to complete.

The implementation of the changes is subject to prior formal approval by MSF. If MSF accepts the proposed variation, a new PSS will be sent for signature to the manufacturer.

If MSF does not accept the proposed variation, the product will be disqualified.

Only products that are conforming to the signed PSS can be supplied to MSF European Supply Centers.

The implementation of a change (in the manufacturing process or the specifications of an MSF qualified product) that has not been approved beforehand by MSF will be considered as a breach of contract.

6. CONFIDENTIALITY COMMITMENT

As a principle, all the information communicated to MSF in the context of the qualification process is considered confidential and will be treated as such.

Any person involved in the assessment process is asked to sign a confidentiality agreement whereby s/he ensures that:

- The confidential information is not used for any purpose other than the evaluation activities conducted for MSF
- Confidential information is not disclosed or provided to any person who is not bound by similar obligations of confidentiality
- All information collected, submitted or observed during the evaluation process is the property of MSF

Manufacturers are reminded that all information contained in the Inter Agency Product Questionnaire may be shared with the UNICEF Supply Division, the WHO Procurement Department, WHO Pre-Qualification Program, the International Committee of the Red Cross, The Global Fund and UNFPA.