



Brazilian GMP for Medical Devices and the experience with the new MDSAP procedure

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Certification and inspection of medical devices

- ➤ Resolution RDC nº 39/2013
- ➤ Resolution RDC nº 15/2014

✓ Establish the GMP certificate as a requirement for pre-market approval of medical devices and IVDs under Class III and IV.



ANVISA INTERNATIONAL INSPECTION

- Inspection team: At least two inspectors
- Inspection duration: Normally four days, depending on complexity and number of lines to be inspected
- Criteria: Requirements on Resolution RDC nº 16/2014



GMP CERTIFICATION FLOW

Fee payment

Submission

Register

Preanalysis

Scheduling

Inspection

Independent review_

Certification issuance or denial

MDSAP Audit report





LEGAL BACKGROUND

Federal Law 9.782/1999 - Art. 7º, Inciso X, § 7º: To comply with the provisions of section X of this article, the Agency may use confidential information about inspections received under agreements with foreign health authorities, as well as authorize national or international organisms accredited by the Agency to carry out inspections at manufacturing plants (Included by Law No. 13,097, of January 19, 2015).



LEGAL BACKGROUND

ANVISA Resolution RDC Nº 39/2013 - Art. 4°, Sole Paragraph: The grant of certification (GMP certificate) that is mentioned on heading of this article may occur upon presentation of valid audit report issued by a third party auditing organization, under specific programs, both recognized by ANVISA.



LEGAL BACKGROUND

Resolution - RE Nº 2.347/2015

Art. 1. Recognize the Medical Device Single Audit Program - MDSAP for the purposes mentioned in the Sole Paragraph of Article 4 of Resolution - RDC No. 39 of 14 August 2013, as amended by Resolution of the Board of Directors - RDC No. 15 of March 28, 2014.

• Single paragraph. Auditing organizations which meet the requirements established under the program will be recognized by ANVISA by the publication of an individual al act.



It is necessary to publish "Specific resolutions – REs" in the Brazilian Official Gazette for each recognized AO in order to legaly allow ANVISA to have their reports used for regulatory purposes



ANVISA REs Granted to MDSAP AOs to Date

BSI Group America Inc. RE 3454/2015

TUV SUD America Inc. RE 80/2016

Intertek Testing Services NA Inc. RE 859/2016

Laboratoire National de Métrologie et

d'Essais

(G-MED Certification Division)

RE 2058/2016





MDSAP results at Anvisa	Nō
Total number of MDSAP manufacturers in the program (20/09/2016)	130
Manufacturers certified by ANVISA using MDSAP outcomes to date	22



Undergoing an MDSAP Pilot audit may accelerate Anvisa's GMP certification process, which is a pre-requisite to the marketing authorization



Perspectives

As more AOs become authorized to conduct MDSAP audits, a increase of the number of manufacturers in the program is anticipated, as well the number of ANVISA certificates issued based on the program





Thank you for your attention!

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