In Russia, the commercialization procedure for medicinal products is decentralized, resulting in a process that’s complicated to follow due to an ever-changing regulatory environment. Several independent regulatory authorities are involved in overseeing the quality of products, which includes issuing of marketing authorizations, licensing of manufacturing facilities (including warehouses) and certifying quality of medicines prior to entering the commercial supply chain (Figure 1). Examples of these regulatory authorities include: the Ministry of Health and the Federal Service for Surveillance in Healthcare, or Roszdravnadzor (RZN); the Ministry of Industry and Trade of the Russian Federation (MinPromTorg) and the Ministry of Economic Development. In addition, accredited testing laboratories play a key role in the process of registration, inspections, initial and routine market entry as well as the quality surveillance of medicinal products on the market.

The federal regulation, “On Licensing of Certain Types of Activities” (1) sets forth licensing requirements. In accordance with Article 12 of this legislation, “The List of Activities Subject to Licensing,” manufacturing of medicinal products and pharmaceutical activities require licensing. Furthermore, the Government Directive on Licensing of Pharmaceutical Activities, defines “pharmaceutical activities” as retail and wholesale commerce, storage and transportation of pharmaceutical products. Licensing of pharmaceutical activities is performed by RZN, whereas licensing of pharmaceutical manufacturing is a responsibility of MinPromTorg. It is worth mentioning that licensing of manufacturing sites applies only to domestic manufacturers. Registration and mandatory conformity assessment of medicinal products, however, is required for domestic as well as foreign products. Mandatory conformity assessments can be satisfied through either certification or declaration of conformance. Independent, accredited certification centers (similar to the “Notified Bodies” in Europe) are authorized to assure compliance of medicinal products and to certify quality systems of manufacturers.

The Russian Pharmacopeia is referred to during the registration and quality control testing. Interestingly, Russia is an observer in the European Pharmacopoeia as part of the European Directorate for Quality of Medicines. This observship allows for participation in the scientific work of the respective committees and the European Pharmacopoeia Commission, which is the decision-making body for this Pharmacopoeia. In addition, the United States Pharmacopoeia (USP) is often used as a reference, as it has been available in Russian since 2009.

Just as the U.S. Department of Health and Human Services resides in the executive branch, the Ministry of Health of the Russian Federation (MoH) rests in the executive branch of the Russian government as well. This Ministry is responsible for registering of medicinal products and issuing of marketing authorization, in addition to many other functions.

The expert evaluation of the dossier during the registration is performed by expert bodies/organizations reporting to the MoH. During this evaluation process, product samples are requested by the MoH along with reference standards and reagents to perform analytical testing. Since the MoH doesn’t have its own laboratory, the preregistration testing is performed by independent authorized laboratories. The applicant is not allowed to conduct method transfer or provide training. Instead, it is expected that the expert laboratory performing the evaluation is capable of executing the testing based simply on the analytical methods submitted by the applicant in Russian. In addition to laboratory testing, expert evaluation of the product quality and product benefit/risk ratio includes review of CMC data. All of the expert evaluation results

---

**Figure 1** Russian Authorities and Commercialization of Medicinal Products in Russia
are forwarded back to the MoH, which makes a decision on the product registration. In accordance with article 15 of the regulation, “On Circulation of Medical Products” \( (2) \), preregistration expertise of medical products resides with the Federal State Institution for the Examination of Medical Products. In addition, selective control of medicinal product quality could be performed during the marketing of the product on regular basis (“selective control”). This control is performed by authorized RZN laboratories (the list of these laboratories is available on RZN website).

Manufacturers need a medicinal products manufacturing license to produce medicines in the RF and a different ministry is involved in the licensing process of manufacturing facilities. Granting these licenses used to be a responsibility of RZN, but after the implementation of a regulation \( (1) \) covering the circulation of medicines, the function of medicinal products manufacturing licensing was handed over to the MinPromTorg. All requirements are provided in the decree, “On Approval of Rules of Licensing of Medicines Manufacturing” \( (3) \). In addition to licensing of manufacturers, MinPromTorg is currently tasked with creating a Russian version of GMPs. GOST R 52249-2009 \( (4) \), is an exact translation of EudraLex - Volume 4 Good Manufacturing Practice Guidelines. The enactment of this standard is expected by the end of 2013, although it could be further postponed.

Even after preregistration quality testing, the product is subject to mandatory conformity assessment through certification, per the regulation, “On Technical Regulation” \( (5) \). The Russian government ensures control of the medicines’ quality and safety by requiring the certificates or declaration of conformance. According to the regulations \( (1) \), medicinal products should be certified in the form of adoption of Declaration of Conformity in the Certification Centers, accredited by Federal Agency for Technical Regulation and Metrology (Figure 2). The list of products subject to certification is outlined in this decree and periodically updated. Interestingly, this list includes not only medical products but extends to a large variety of industrial materials, ensuring that these items meet standards for entry to the Russian market.

In a case where compulsory certification or declaration of conformance is required, the product samples are sent for laboratory analysis, performed by authorized laboratories, accredited by the Russian Federal Accreditation Services, which publishes and maintains the list of authorized laboratories.

The Russian Federal Accreditation Services is part of the Russian Ministry of Economic Development, similar to how the National Institute of Standards and Technology is part of the U.S. Department of Commerce. Based on the outcome of analytical testing, Certificates of Conformance are issued by accredited Certification Centers.

When comparing the certification process in Russia with pharmaceutical products quality requirements in the United States or European Union, one can see greater differences than similarities. In the United States and Europe, manufacturers are entrusted with certifying the quality of their products and releasing them to the market, however, in Russia there is much greater government involvement.Remarkably, the closest parallel to the Russian certification process is the Declaration of Conformity (DoC) for medical devices carrying the CE marking in the European Union. In this case, an EU Notified Body is an organization that has been accredited by a Member State to assess whether a product meets quality standards. This organization is empowered to certify that a medical device conforms to the EU Medical Devices Directive, which defines the standards for medical devices. With a DoC, the manufacturer can label the product with the CE Mark, which is required for distribution and sale in the European Union.

Similar to Notified Bodies, Certification Centers are accredited by Russian Federal Accreditation Services to evaluate the quality of medicinal products and issue a Certificate of Conformance. Examples of such Certification Centers in Moscow are District Quality Control Center and the Federal Center of Expertise and Quality Control of Medicinal Products. Along with issuing Certificates of Conformance, these Centers are accredited to certify Pharmaceutical Quality...
TRI Shares Expertise With SPCPA Delegation

On Oct. 24, members of the St. Petersburg Chemical and Pharmaceutical Academy in Russia visited PDA’s Training and Research Institute as part of the Academy’s initiative to build a training center in St. Petersburg (see story on p. 7 of the May 2013 issue).

Academy representatives Alexey Marchenko, Nataliya Lebed, Yulia Perova and Tatiana Buldakova were gracious to answer the following questions for the PDA Letter:

1. What are the goals of the St. Petersburg Chemical and Pharmaceutical Academy in establishing a training center for pharmaceutical professionals, both in government and in the private sector, in St. Petersburg?

   International GMP standards will be introduced in Russia at the beginning of 2014. This will make the issue of training the Russian GMP Inspectorate vital. We expect that this particular problem will be solved with the help of GMP center in Saint Petersburg. In addition, the center will be able to give opportunities for domestic and foreign pharmaceutical companies to improve the skills of their staff.

2. Will the Center focus primarily on the industry in and around the city, or does it hope to serve members of the industry throughout Russia?

   The training center will focus on training of specialists from Russia and from Commonwealth of Independent States countries.

3. How comparable will this training facility be with PDA’s Training and Research Institute? If very similar, will it include hands-on GMP processes, like a clean room and testing labs? If not as extensive, will it include lecture space? And if so, would it accommodate multiple lectures at one time?

   We are proud that we were the first specialists from Russia, who have been trained at PDA, and were able to get acquainted with the unique simulator aseptic that meets GMP requirements. We will create a training center in St. Petersburg that takes into account best international practices and the needs of the modern pharmaceutical industry.

4. What is the timeline for establishing the center? What are your next steps when you return to Russia?

   The center is in the design stage now. After training and returning to Russia, we plan to share the experience with our colleagues at the Academy and continue working on the project.

5. Once your training facility is in place, do you see private-sector professionals benefitting from it as much as regulatory inspectors and SPCPA students?

   It is planned that the activities of the GMP center will be directed to the widest possible audience of interested professionals and pharmaceutical industry.

6. You plan to offer GMP-related courses. Do you have an initial syllabus already planned? Will these be modeled on existing PDA TRI courses?

   We look forward to working closely with PDA specialists in the development of training programs.
Regulation of scrutiny than that found in the West. A major issue is the absence of legal basis for enforcement of GMP regulations at this time. Ultimately, more inspections by certification centers and other, various Russian authorities can be expected.

References
2. Federal Law N 61-FZ of 12-Apr-2010 on the Circulation of Medicines
3. Decree N 686 of 06-Jul-2012: on “Approval of Rules of Licensing of Medicines Manufacturing”
4. GOST R 52249-2009 (GMP for RF)

About the Authors

Elizabeth Meyers is the Senior Manager at Amgen International Quality & External Affairs and is responsible for Russia and CIS.

Natalya Parfenova is the Director at District Quality Control Center in Moscow, Russia. She is an expert on certification of Quality Management Systems.

Stephan Rönninger, PhD is the Head of External Affairs Europe, International Quality at Amgen (Europe) GmbH.