Sundhedsstyrelsen
Danish Health and Medicines Authority

Guidelines on registration as manufacturer, importer and distributor of active substances (API) for manufacturing of human medicines

These guidelines describe how to complete the form for registration as a manufacturer, importer and distributor of active substances (active pharmaceutical ingredients, APIs) for manufacturing of human medicines.

In the following, we will refer to this simply as an API registration.

For information about the requirements for the manufacture, import and distribution of APIs, we refer to the Danish executive order on manufacture, import and distribution of active substances for manufacturing of medicinal products (Danish title: '*Bekendtgørelse om fremstilling, indførsel og distribution af aktive stoffer til fremstilling af lægemidler*') - in the following the 'Danish API order'.

Please note that biological APIs and sterile APIs are also considered intermediate products, which implies that companies must register in accordance with the Danish API order as well as apply for authorisation in accordance with the Danish executive order on manufacture and import of medicinal products and intermediate products (Danish title: '*Bekendtgørelse om fremstilling og indførsel af lægemidler og mellemprodukter*') to obtain a GMP authorisation.

General guidance on registration

1. Before submission of the registration form
Before registration, the company must ensure that it complies with the requirements established in the Danish API order.

2. Submission of registration form
The applicant must submit the registration form to the Danish Health and Medicines Authority no later than 60 days before the activities are planned to start.

The registration form must be submitted together with information about the premises and technical equipment to be used for the operations. For API manufacturers this could be in the form of a Site Master File or the like. The Site Master File (SMF) is a brief description /overview of the manufacturing sites that manufacture marketed products. The SMF can be prepared according to the Explanatory Notes on the preparation of a Site Master File, EudraLex, Vol. 4 2010. For importers and distributors of APIs, an organisation chart and site plan of the premises will be sufficient.

In addition, the registration must be submitted with a detailed cover letter or email, describing the reason for the registration.

How to fill in the registration form:
The API registration has one Annex with two sections
Section 1: Manufacturing operations
Section 2: Importation and distribution operations

<u>1. Manufacturing operations</u>
Indicate the active substances that are manufactured and the manufacturing activities carried out at the site address. Please note that an Annex must be completed for each manufacturing site.

Manufacturing of APIs includes distribution of own-manufactured APIs. The company/site is only required to register as a distributor if it distributes APIs other than its own manufactured APIs.

<u>2. Importation and distribution operations</u>
Importation:
Indicate the active substances which the company imports from a non-EU/EEA country (third country).

Distribution:
Indicate the active substances which the company distributes. In this context, distribution means distribution, receipt, storage and supply of active substances.

If stock has been contracted out to another company, please indicate this under "clarifying remarks" in the form.

3. Inspection and acknowledgement of receipt
The Danish Health and Medicines Authority may decide to inspect the company requesting to register. If the Danish Health and Medicines Authority within 60 days from receipt of the registration form informs the company having submitted the registration that an inspection visit will be carried out, the company must not begin the activities, before being notified by the Danish Health and Medicines Authority.

The company will be informed if the Danish Health and Medicines Authority considers it necessary to inspect the company and will be contacted in order to arrange a date for the inspection. When the inspection is satisfactory, the Danish Health and Medicines Authority will confirm receipt of the registration, indicating a registration number. This registration number will appear on the list of manufacturers, importers and distributors of active substances (APIs) which is published on the website of the Danish Health and Medicines Authority.

If the Danish Health and Medicines Authority finds that no inspection is necessary within the 60 days, it will acknowledge receipt of the registration. The receipt will include a registration number. This registration number will appear on the list of manufacturers, importers and distributors of active substances (APIs) which is published on the website of the Danish Health and Medicines Authority.

5. Changes to the registration
Each year, registered companies and persons are to submit to the Danish Health and Medicines Authority a list of changes having taken place relative to the information that was provided on the registration form. Any changes that may affect the quality or the safety of the active substances being manufactured, imported or distributed must, however, be notified to the Danish Health and Medicines Authority immediately.

6. Termination of registration
If a registered company wants to terminate its registration, it must notify the Danish Health and Medicines Authority in writing.

7. Fees

The registration fee is determined by the Ministry of Health and in the Danish Executive Order on Fees Payable for Medicinal Products.

A fee is payable for first-time registrations, relocation to a new address or expansion to cover several, geographically separated addresses.

One fee is charged for each site (geographical locality) where manufacturing activities take place. A fee is also charged for each site (geographical locality) either importing and/or distributing APIs. Two fees are thus payable for companies that both manufacture and import/distribute APIs

The registration fee is a one-off fee, which is charged on receipt of a registration request. In addition, an annual fee/control fee is charged in the first quarter every year. However, no annual fee/control fee is payable in the year when the registration fee for first-time registration is paid.

The registration fee/annual fee may be adjusted on 1 January every year.

Version: Guidelines-Registration of API-02
Last updated February 2013