



## **GUIDELINES ON GOOD MANUFACTURING PRACTICE FOR MEDICINAL PRODUCTS**

### **ANNEXES**

National Drug Authority  
Head Office  
Rume Towers  
Plot 19, Lumumba Avenue  
P. O. Box 23096  
Kampala, Uganda.  
Tel: +256417788100  
E-mail: [ndaug@nda.or.ug](mailto:ndaug@nda.or.ug)  
Website: <http://www.nda.or.ug>

*Acknowledgement:*

*These Guidelines were adopted from the "Guide to Good Manufacturing Practice for Medicinal Products Part I; PE 009-14 (Annexes), 1 February 2022, Pharmaceutical Inspection Co-operation Scheme, Geneva.*

Doc. No.: INS/GDL/001-(Annexes)	Revision Date: 28 Aug. 2023	Review Due Date: 6 Sep 2023
Revision No.: 3	Effective Date : 6 Sep 2023	

**ANNEXES**

<b>Annex 1</b> (Manufacture of sterile medicinal products)	1
Principle	1
General	1
Clean room and clean air device classification	2
Clean room and clean air device monitoring	3
Isolator technology	5
Blow/fill/seal technology	6
Terminally sterilised products	6
Aseptic preparation	7
Personnel	7
Premises	8
Equipment	10
Sanitation	10
Processing	10
Sterilisation	13
Sterilisation by heat	13
Moist heat	14
Dry heat	14
Sterilisation by radiation	14
Sterilisation with ethylene oxide	15
Filtration of medicinal products which cannot be sterilised in their final container	16
Finishing of sterile products	16
Quality control	17
<b>Annex 2A</b>	
(Manufacture of advanced therapy medicinal products for human use)	19
Scope	19
Principle	23
Part A: General guidance	24
Supplementary provisions to PIC/S GMP Guide Part I	25
Chapter 1 Pharmaceutical quality system	25
Chapter 2 Personnel	25
Chapter 3 Premises and equipment	26
Chapter 4 Documentation	30
Chapter 5 Production	31
Chapter 6 Quality control	42
Chapter 7 Outsourced activities	47
Chapter 8 Complaints and product recall	48
Part B: Specific guidance on selected product types	49
Common glossary to Annex 2A and 2B	52
<b>Annex 2B</b>	
(Manufacture of biological medicinal substances and products for human use)	59
Scope	59
Principle	61
Part A: General guidance	63
Personnel	63
Premises and equipment	63
Animals	66
Documentation	67

---

Production	67
Starting and raw materials	68
Seed lot and cell bank system	70
Operating principles	71
Quality control	73
Part B: Specific guidance on selected product types	74
<b>Annex 3 (Manufacture of radiopharmaceuticals)</b>	<b>79</b>
Principle	79
Introduction	79
Quality assurance	80
Personnel	81
Premises and equipment	81
Documentation	82
Production	82
Quality control	83
Reference and retention samples	85
Distribution	85
Glossary	85
<b>Annex 4</b>	
(Manufacture of veterinary medicinal products other than immunologicals)	86
Manufacture of premixes for medicated feeding stuffs	86
The manufacture of ectoparasiticides	87
The manufacture of veterinary medicinal products containing penicillins	87
Retention of samples	87
Sterile veterinary medicinal products	87
<b>Annex 5 (Manufacture of immunological veterinary medical products)</b>	<b>88</b>
Principle	88
Personnel	88
Premises	89
Equipment	92
Animals and animal houses	93
Disinfection Waste disposal	93
Production	93
Starting materials	94
Quality control	96
<b>Annex 6 (Manufacture of medicinal gases)</b>	<b>98</b>
Principle	98
Manufacture of active substance gases	98
Manufacture of medicinal gases	99
Personnel	99
Premises and equipment	100
Documentation	101
Production	102
Quality control	105
Transportation of packaged gases	106
Glossary	106

---

<b>Annex 7 (Manufacture of herbal medicinal products)</b>	108
Principle	108
Premises	110
Storage areas	110
Production area	110
Equipment	110
Documentation	110
Specifications for starting materials	110
Processing instructions	111
Quality Control	112
<b>Annex 8 (Sampling of starting and packaging materials)</b>	113
Principle	113
Personnel	113
Starting materials	113
Packaging material	114
<b>Annex 9 (Manufacture of liquids, creams and ointments)</b>	115
Principle	115
Premises and equipment	115
Production	115
<b>Annex 10</b>	
(Manufacture of pressurised metered dose aerosol preparations for inhalation)	117
Principle	117
General	117
Premises and equipment	117
Production and quality control	118
<b>Annex 11 (Computerised systems)</b>	119
Principle	119
General	119
Risk management	119
Personnel	119
Suppliers and service providers	119
Project phase	120
Validation	120
Operational phase	120
Data	120
Accuracy checks	120
Data storage	121
Printouts	121
Audit trails	121
Change and configuration management	121
Periodic evaluation	121
Security	121
Incident management	122
Electronic signature	122
Batch release	122
Business continuity	122
Archiving	122
Glossary	122

---

<b>Annex 12 (Use of ionising radiation in the manufacture of medicinal products)</b>	124
Introduction	124
Responsibilities	124
Dosimetry	125
Validation of the process	125
Commissioning of the plant	126
General	126
Gamma irradiators	126
Electron beam irradiators	127
Premises	128
Processing	128
Gamma irradiators	128
Electron beam irradiators	129
Documentation	129
Microbiological monitoring	129
<b>Annex 13 (Manufacture of investigational medicinal products)</b>	130
Introduction	130
Scope	131
Pharmaceutical Quality System	132
Personnel	133
Premises and equipment	134
Documentation	134
Production	136
Quality control	139
Release of batches	140
Outsourced operations	142
Complaints	142
Recalls and returns	142
Glossary	143
<b>Annex 14</b>	
(Manufacture of medicinal products derived from human blood or plasma)	146
Glossary	146
Scope	148
Principles	148
Quality management	150
Traceability and post collection measures	151
Premises and equipment	153
Manufacturing	153
Quality control	155
Release of intermediate and finished products	156
Retention of plasma pool samples	156
Disposal of waste	156
Addendum	156
<b>Annex 15 (Qualification and validation)</b>	160
Principle	160
General	160
Organising and Planning for Qualification and Validation	160
Documentation, including VMP	161
Qualification Stages for Equipment, Facilities and Systems	162
Re-qualification	163

Process Validation	164
Verification of Transportation	168
Validation of Packaging	168
Qualification of Utilities	169
Validation of Test Methods	169
Cleaning Validation	169
Change Control	171
Glossary	172
<b>Annex 16</b> (Certification by the Authorised person and batch release)	175
Scope	175
General Principles	175
The Process of Certification	176
Relying on GMP Assessments by Third Parties, e.g. Audits	182
Handling of Unexpected Deviations	182
The Release of a Batch	183
Glossary	183
Appendix I	185
Appendix II	186
<b>Annex 17</b> (Real Time Release Testing and Parametric Release)	187
Principle	187
Scope	187
Real Time Release Testing (RTRT)	187
Parametric Release and Sterilisation	189
Glossary	191
<b>Annex 18</b> [GMP Guide for active pharmaceutical ingredients]**	192
<b>Annex 19</b> (Reference and retention samples)	193
Scope	193
Principle	193
Duration of storage	194
Size of reference and retention samples	194
Storage conditions	195
Written agreements	195
Reference samples – General points	195
Retention samples – General points	196
Reference and retention samples for parallel imported / parallel distributed products	196
Reference and retention samples in the case of closedown of a manufacturer	196
<b>Annex 20</b> (Quality risk management)***	198
Foreword and scope of application	198
Introduction	198
Scope	200
Principles of quality risk management	200

\*\* The EU first adopted the ICH GMP Guide on APIs as Annex 18 to the EU GMP Guide while PIC/S adopted it as a stand-alone GMP Guide (PE 007). The Guide has now been adopted as Part II of the PIC/S GMP Guide (see PE 009 (Part II)).

\*\*\* This Annex is voluntary.

---

General quality risk management process	200
Responsibilities	201
Initiating a quality risk management process	202
Risk assessment	202
Risk control	203
Risk communication	204
Risk review	204
Risk management methodology	204
Integration of quality risk management into industry and regulatory operations	205
Definitions	206
References	207
Appendix I: Risk Management Methods and Tools	209
Basic Risk Management Facilitation Methods	209
Failure Mode Effects Analysis (FMEA)	209
Potential Areas of Use(s)	209
Failure Mode, Effects and Criticality Analysis (FMECA)	209
Fault Tree Analysis (FTA)	210
Hazard Analysis and Critical Control Points (HACCP)	210
Hazard Operability Analysis (HAZOP)	211
Preliminary Hazard Analysis (PHA)	211
Risk Ranking and Filtering	211
Supporting Statistical Tools	212
Appendix II: Potential Applications For Quality Risk Management	213
Quality Risk Management as Part of Integrated Quality Management	213
Quality Risk Management as Part of Regulatory Operations	214
Quality Risk Management as Part of Development	215
Quality Risk Management for Facilities, Equipment and Utilities	215
Quality Risk Management as Part of Materials Management	216
Quality Risk Management as Part of Production	217
Quality Risk Management as Part of Laboratory Control and Stability Studies	217
Quality Risk Management as Part of Packaging and Labelling	217
<b>GLOSSARY</b>	219
<b>DOCUMENT REVISION HISTORY</b>	225

## ANNEX 1

# MANUFACTURE OF STERILE MEDICINAL PRODUCTS

## PRINCIPLE

The manufacture of sterile products is subject to special requirements in order to minimise risks of microbiological contamination, and of particulate and pyrogen contamination. Much depends on the skill, training and attitudes of the personnel involved. Quality Assurance is particularly important, and this type of manufacture must strictly follow carefully established and validated methods of preparation and procedure. Sole reliance for sterility or other quality aspects must not be placed on any terminal process or finished product test.

Note: This guidance does not lay down detailed methods for determining the microbiological and particulate cleanliness of air, surfaces, etc. Reference should be made to other documents such as the EN/ISO Standards.

## GENERAL

1. The manufacture of sterile products should be carried out in clean areas entry to which should be through airlocks for personnel and/or for equipment and materials. Clean areas should be maintained to an appropriate cleanliness standard and supplied with air which has passed through filters of an appropriate efficiency.
2. The various operations of component preparation, product preparation and filling should be carried out in separate areas within the clean area. Manufacturing operations are divided into two categories; firstly, those where the product is terminally sterilised, and secondly those which are conducted aseptically at some or all stages.
3. Clean areas for the manufacture of sterile products are classified according to the required characteristics of the environment. Each manufacturing operation requires an appropriate environmental cleanliness level in the operational state in order to minimise the risks of particulate or microbial contamination of the product or materials being handled.

In order to meet “in operation” conditions these areas should be designed to reach certain specified air-cleanliness levels in the “at rest” occupancy state. The “at rest” state is the condition where the installation is installed and operating, complete with production equipment but with no operating personnel present. The “in operation” state is the condition where the installation is functioning in the defined operating mode with the specified number of personnel working.

The “in operation” and “at rest” states should be defined for each clean room or suite of clean rooms.



For the manufacture of sterile medicinal products 4 grades can be distinguished.

**Grade A:** The local zone for high risk operations, e.g. filling zone, stopper bowls, open ampoules and vials, making aseptic connections. Normally such conditions are provided by a laminar air flow work station. Laminar air flow systems should provide a homogeneous air speed in a range of 0.36 – 0.54 m/s (guidance value) at the working position in open clean room applications. The maintenance of laminarity should be demonstrated and validated.

A uni-directional air flow and lower velocities may be used in closed isolators and glove boxes.

**Grade B:** For aseptic preparation and filling, this is the background environment for the grade A zone.

**Grade C and D:** Clean areas for carrying out less critical stages in the manufacture of sterile products

## CLEAN ROOM AND CLEAN AIR DEVICE CLASSIFICATION

4. Clean rooms and clean air devices should be classified in accordance with EN ISO 14644-1. Classification should be clearly differentiated from operational process environmental monitoring. The maximum permitted airborne particle concentration for each grade is given in the following table:

Grade	Maximum permitted number of particles/m <sup>3</sup> equal to or greater than the tabulated size			
	At rest		In operation	
	0.5µm	5.0µm	0.5µm	5.0µm
A	3,520	20	3,520	20
B	3,520	29	352,000	2,900
C	352,000	2,900	3,520,000	29,000
D	3,520,000	29,000	not defined	not defined

5. For classification purposes in Grade A zones, a minimum sample volume of 1m<sup>3</sup> should be taken per sample location. For Grade A the airborne particle classification is ISO 4.8 dictated by the limit for particles ≥5.0 µm. For Grade B (at rest) the airborne particle classification is ISO 5 for both considered particle sizes. For Grade C (at rest & in operation) the airborne particle classification is ISO 7 and ISO 8 respectively. For Grade D (at rest) the airborne particle classification is ISO 8. For classification purposes EN/ISO 14644-1 methodology defines both the minimum number of sample locations and the sample size based on the class limit of the largest considered particle size and the method of evaluation of the data collected.
6. Portable particle counters with a short length of sample tubing should be used for classification purposes because of the relatively higher rate of precipitation of

particles  $\geq 5.0\mu\text{m}$  in remote sampling systems with long lengths of tubing. Isokinetic sample heads should be used in unidirectional airflow systems.

7. "In operation" classification may be demonstrated during normal operations, simulated operations or during media fills as worst-case simulation is required for this. EN ISO 14644-2 provides information on testing to demonstrate continued compliance with the assigned cleanliness classifications.

## **CLEAN ROOM AND CLEAN AIR DEVICE MONITORING**

8. Clean rooms and clean air devices should be routinely monitored in operation and the monitoring locations based on a formal risk analysis study and the results obtained during the classification of rooms and/or clean air devices.
9. For Grade A zones, particle monitoring should be undertaken for the full duration of critical processing, including equipment assembly, except where justified by contaminants in the process that would damage the particle counter or present a hazard, e.g. live organisms and radiological hazards. In such cases monitoring during routine equipment set up operations should be undertaken prior to exposure to the risk. Monitoring during simulated operations should also be performed. The Grade A zone should be monitored at such a frequency and with suitable sample size that all interventions, transient events and any system deterioration would be captured and alarms triggered if alert limits are exceeded. It is accepted that it may not always be possible to demonstrate low levels of  $\geq 5.0\mu\text{m}$  particles at the point of fill when filling is in progress, due to the generation of particles or droplets from the product itself.
10. It is recommended that a similar system be used for Grade B zones although the sample frequency may be decreased. The importance of the particle monitoring system should be determined by the effectiveness of the segregation between the adjacent Grade A and B zones. The Grade B zone should be monitored at such a frequency and with suitable sample size that changes in levels of contamination and any system deterioration would be captured and alarms triggered if alert limits are exceeded.
11. Airborne particle monitoring systems may consist of independent particle counters; a network of sequentially accessed sampling points connected by manifold to a single particle counter; or a combination of the two. The system selected must be appropriate for the particle size considered. Where remote sampling systems are used, the length of tubing and the radii of any bends in the tubing must be considered in the context of particle losses in the tubing. The selection of the monitoring system should take account of any risk presented by the materials used in the manufacturing operation, for example those involving live organisms or radiopharmaceuticals.
12. The sample sizes taken for monitoring purposes using automated systems will usually be a function of the sampling rate of the system used. It is not necessary for the sample volume to be the same as that used for formal classification of clean rooms and clean air devices.

13. In Grade A and B zones, the monitoring of the  $\geq 5.0 \mu\text{m}$  particle concentration count takes on a particular significance as it is an important diagnostic tool for early detection of failure. The occasional indication of  $\geq 5.0 \mu\text{m}$  particle counts may be false counts due to electronic noise, stray light, coincidence, etc. However consecutive or regular counting of low levels is an indicator of a possible contamination event and should be investigated. Such events may indicate early failure of the HVAC system, filling equipment failure or may also be diagnostic of poor practices during machine set-up and routine operation.
14. The particle limits given in the table for the “at rest” state should be achieved after a short “clean up” period of 15-20 minutes (guidance value) in an unmanned state after completion of operations.
15. The monitoring of Grade C and D areas in operation should be performed in accordance with the principles of quality risk management. The requirements and alert/action limits will depend on the nature of the operations carried out, but the recommended “clean up period” should be attained.
16. Other characteristics such as temperature and relative humidity depend on the product and nature of the operations carried out. These parameters should not interfere with the defined cleanliness standard.
17. Examples of operations to be carried out in the various grades are given in the table below (see also paragraphs 28 to 35):

Grade	Examples of operations for terminally sterilised products (see para. 28-30)
A	Filling of products, when unusually at risk
C	Preparation of solutions, when unusually at risk. Filling of products
D	Preparation of solutions and components for subsequent filling

Grade	Examples of operations for aseptic preparations (see para. 31-35)
A	Aseptic preparation and filling
C	Preparation of solutions to be filtered
D	Handling of components after washing

18. Where aseptic operations are performed monitoring should be frequent using methods such as settle plates, volumetric air and surface sampling (e.g. swabs and contact plates). Sampling methods used in operation should not interfere with zone protection. Results from monitoring should be considered when reviewing batch documentation for finished product release. Surfaces and personnel should be monitored after critical operations. Additional microbiological monitoring is also required outside production operations, e.g. after validation of systems, cleaning and sanitisation.

19. Recommended limits for microbiological monitoring of clean areas during operation:

Grade	Recommended limits for microbial contamination <sup>(a)</sup>			
	Air sample cfu/m <sup>3</sup>	Settle plates (diam. 90 mm), cfu/4 hours <sup>(b)</sup>	Contact plates (diam. 55 mm), cfu/plate	Glove print 5 fingers cfu/glove
A	< 1	< 1	< 1	< 1
B	10	5	5	5
C	100	50	25	-
D	200	100	50	-

**Notes:** <sup>(a)</sup> These are average values.

<sup>(b)</sup> Individual settle plates may be exposed for less than 4 hours.

20. Appropriate alert and action limits should be set for the results of particulate and microbiological monitoring. If these limits are exceeded operating procedures should prescribe corrective action.

## ISOLATOR TECHNOLOGY

21. The utilisation of isolator technology to minimise human interventions in processing areas may result in a significant decrease in the risk of microbiological contamination of aseptically manufactured products from the environment. There are many possible designs of isolators and transfer devices. The isolator and the background environment should be designed so that the required air quality for the respective zones can be realised. Isolators are constructed of various materials more or less prone to puncture and leakage. Transfer devices may vary from a single door to double door designs to fully sealed systems incorporating sterilisation mechanisms.
22. The transfer of materials into and out of the unit is one of the greatest potential sources of contamination. In general, the area inside the isolator is the local zone for high risk manipulations, although it is recognised that laminar air flow may not exist in the working zone of all such devices.
23. The air classification required for the background environment depends on the design of the isolator and its application. It should be controlled and for aseptic processing it should be at least grade D.
24. Isolators should be introduced only after appropriate validation. Validation should take into account all critical factors of isolator technology, for example the quality of the air inside and outside (background) the isolator, sanitisation of the isolator, the transfer process and isolator integrity.

25. Monitoring should be carried out routinely and should include frequent leak testing of the isolator and glove/sleeve system.

## **BLOW/FILL/SEAL TECHNOLOGY**

26. Blow/fill/seal units are purpose built machines in which, in one continuous operation, containers are formed from a thermoplastic granulate, filled and then sealed, all by the one automatic machine. Blow/fill/seal equipment used for aseptic production which is fitted with an effective grade A air shower may be installed in at least a grade C environment, provided that grade A/B clothing is used. The environment should comply with the viable and non-viable limits at rest and the viable limit only when in operation. Blow/fill/seal equipment used for the production of products which are terminally sterilised should be installed in at least a grade D environment.
27. Because of this special technology particular attention should be paid to, at least the following:
- equipment design and qualification
  - validation and reproducibility of cleaning-in-place and sterilisation-in-place
  - background clean room environment in which the equipment is located
  - operator training and clothing
  - interventions in the critical zone of the equipment including any aseptic assembly prior to the commencement of filling.

## **TERMINALLY STERILISED PRODUCTS**

28. Preparation of components and most products should be done in at least a grade D environment in order to give low risk of microbial and particulate contamination, suitable for filtration and sterilisation. Where the product is at a high or unusual risk of microbial contamination, (for example, because the product actively supports microbial growth or must be held for a long period before sterilisation or is necessarily processed not mainly in closed vessels), then preparation should be carried out in a grade C environment.
29. Filling of products for terminal sterilisation should be carried out in at least a grade C environment.
30. Where the product is at unusual risk of contamination from the environment, for example because the filling operation is slow or the containers are wide-necked or are necessarily exposed for more than a few seconds before sealing, the filling should be done in a grade A zone with at least a grade C background. Preparation and filling of ointments, creams, suspensions and emulsions should generally be carried out in a grade C environment before terminal sterilisation.

## **ASEPTIC PREPARATION**

31. Components after washing should be handled in at least a grade D environment. Handling of sterile starting materials and components, unless subjected to sterilisation or filtration through a micro-organism-retaining filter later in the process, should be done in a grade A environment with grade B background.
32. Preparation of solutions which are to be sterile filtered during the process should be done in a grade C environment; if not filtered, the preparation of materials and products should be done in a grade A environment with a grade B background.
33. Handling and filling of aseptically prepared products should be done in a grade A environment with a grade B background.
34. Prior to the completion of stoppering, transfer of partially closed containers, as used in freeze drying, should be done either in a grade A environment with grade B background or in sealed transfer trays in a grade B environment.
35. Preparation and filling of sterile ointments, creams, suspensions and emulsions should be done in a grade A environment, with a grade B background, when the product is exposed and is not subsequently filtered.

## **PERSONNEL**

36. Only the minimum number of personnel required should be present in clean areas; this is particularly important during aseptic processing. Inspections and controls should be conducted outside the clean areas as far as possible.
37. All personnel (including those concerned with cleaning and maintenance) employed in such areas should receive regular training in disciplines relevant to the correct manufacture of sterile products. This training should include reference to hygiene and to the basic elements of microbiology. When outside staff who have not received such training (e.g. building or maintenance contractors) need to be brought in, particular care should be taken over their instruction and supervision.
38. Staff who have been engaged in the processing of animal tissue materials or of cultures of micro-organisms other than those used in the current manufacturing process should not enter sterile-product areas unless rigorous and clearly defined entry procedures have been followed.
39. High standards of personal hygiene and cleanliness are essential. Personnel involved in the manufacture of sterile preparations should be instructed to report any condition which may cause the shedding of abnormal numbers or types of contaminants; periodic health checks for such conditions are desirable. Actions to be taken about personnel who could be introducing undue microbiological hazard should be decided by a designated competent person.
40. Wristwatches, make-up and jewellery should not be worn in clean areas.

41. Changing and washing should follow a written procedure designed to minimise contamination of clean area clothing or carry-through of contaminants to the clean areas.
42. The clothing and its quality should be appropriate for the process and the grade of the working area. It should be worn in such a way as to protect the product from contamination.
43. The description of clothing required for each grade is given below:
  - Grade D: Hair and, where relevant, beard should be covered. A general protective suit and appropriate shoes or overshoes should be worn. Appropriate measures should be taken to avoid any contamination coming from outside the clean area.
  - Grade C: Hair and where relevant beard and moustache should be covered. A single or two-piece trouser suit, gathered at the wrists and with high neck and appropriate shoes or overshoes should be worn. They should shed virtually no fibres or particulate matter.
  - Grade A/B: Headgear should totally enclose hair and, where relevant, beard and moustache; it should be tucked into the neck of the suit; a face mask should be worn to prevent the shedding of droplets. Appropriate sterilised, non-powdered rubber or plastic gloves and sterilised or disinfected footwear should be worn. Trouser-legs should be tucked inside the footwear and garment sleeves into the gloves. The protective clothing should shed virtually no fibres or particulate matter and retain particles shed by the body.
44. Outdoor clothing should not be brought into changing rooms leading to grade B and C rooms. For every worker in a grade A/B area, clean sterile (sterilised or adequately sanitised) protective garments should be provided at each work session. Gloves should be regularly disinfected during operations. Masks and gloves should be changed at least for every working session.
45. Clean area clothing should be cleaned and handled in such a way that it does not gather additional contaminants which can later be shed. These operations should follow written procedures. Separate laundry facilities for such clothing are desirable. Inappropriate treatment of clothing will damage fibres and may increase the risk of shedding of particles.

## **PREMISES**

46. In clean areas, all exposed surfaces should be smooth, impervious and unbroken in order to minimise the shedding or accumulation of particles or micro-organisms and to permit the repeated application of cleaning agents, and disinfectants where used.
47. To reduce accumulation of dust and to facilitate cleaning there should be no uncleanable recesses and a minimum of projecting ledges, shelves, cupboards and equipment. Doors should be designed to avoid those uncleanable recesses; sliding doors may be undesirable for this reason.

48. False ceilings should be sealed to prevent contamination from the space above them.
49. Pipes and ducts and other utilities should be installed so that they do not create recesses, unsealed openings and surfaces which are difficult to clean.
50. Sinks and drains should be prohibited in grade A/B areas used for aseptic manufacture. In other areas air breaks should be fitted between the machine or sink and the drains. Floor drains in lower grade clean rooms should be fitted with traps or water seals to prevent backflow.
51. Changing rooms should be designed as airlocks and used to provide physical separation of the different stages of changing and so minimise microbial and particulate contamination of protective clothing. They should be flushed effectively with filtered air. The final stage of the changing room should, in the at-rest state, be the same grade as the area into which it leads. The use of separate changing rooms for entering and leaving clean areas is sometimes desirable. In general hand washing facilities should be provided only in the first stage of the changing rooms.
52. Both airlock doors should not be opened simultaneously. An interlocking system or a visual and/or audible warning system should be operated to prevent the opening of more than one door at a time.
53. A filtered air supply should maintain a positive pressure and an air flow relative to surrounding areas of a lower grade under all operational conditions and should flush the area effectively. Adjacent rooms of different grades should have a pressure differential of 10-15 pascals (guidance values). Particular attention should be paid to the protection of the zone of greatest risk, that is, the immediate environment to which a product and cleaned components which contact the product are exposed. The various recommendations regarding air supplies and pressure differentials may need to be modified where it becomes necessary to contain some materials, e.g. pathogenic, highly toxic, radioactive or live viral or bacterial materials or products. Decontamination of facilities and treatment of air leaving a clean area may be necessary for some operations.
54. It should be demonstrated that air-flow patterns do not present a contamination risk, e.g. care should be taken to ensure that air flows do not distribute particles from a particlegenerating person, operation or machine to a zone of higher product risk.
55. A warning system should be provided to indicate failure in the air supply. Indicators of pressure differences should be fitted between areas where these differences are important. These pressure differences should be recorded regularly or otherwise documented.



## **EQUIPMENT**

56. A conveyor belt should not pass through a partition between a grade A or B area and a processing area of lower air cleanliness, unless the belt itself is continually sterilised (e.g. in a sterilising tunnel).
57. As far as practicable equipment, fittings and services should be designed and installed so that operations, maintenance and repairs can be carried out outside the clean area. If sterilisation is required, it should be carried out, wherever possible, after complete reassembly.
58. When equipment maintenance has been carried out within the clean area, the area should be cleaned, disinfected and/or sterilised where appropriate, before processing recommences if the required standards of cleanliness and/or asepsis have not been maintained during the work.
59. Water treatment plants and distribution systems should be designed, constructed and maintained so as to ensure a reliable source of water of an appropriate quality. They should not be operated beyond their designed capacity. Water for injections should be produced, stored and distributed in a manner which prevents microbial growth, for example by constant circulation at a temperature above 70°C.
60. All equipment such as sterilisers, air handling and filtration systems, air vent and gas filters, water treatment, generation, storage and distribution systems should be subject to validation and planned maintenance; their return to use should be approved.

## **SANITATION**

61. The sanitation of clean areas is particularly important. They should be cleaned thoroughly in accordance with a written programme. Where disinfectants are used, more than one type should be employed. Monitoring should be undertaken regularly in order to detect the development of resistant strains.
62. Disinfectants and detergents should be monitored for microbial contamination; dilutions should be kept in previously cleaned containers and should only be stored for defined periods unless sterilised. Disinfectants and detergents used in Grades A and B areas should be sterile prior to use.
63. Fumigation of clean areas may be useful for reducing microbiological contamination in inaccessible places.

## **PROCESSING**

64. Precautions to minimise contamination should be taken during all processing stages including the stages before sterilisation.
65. Preparations of microbiological origin should not be made or filled in areas used for the processing of other medicinal products; however, vaccines of dead

organisms or of bacterial extracts may be filled, after inactivation, in the same premises as other sterile medicinal products.

66. Validation of aseptic processing should include a process simulation test using a nutrient medium (media fill). Selection of the nutrient medium should be made based on dosage form of the product and selectivity, clarity, concentration and suitability for sterilisation of the nutrient medium.
67. The process simulation test should imitate as closely as possible the routine aseptic manufacturing process and include all the critical subsequent manufacturing steps. It should also take into account various interventions known to occur during normal production as well as worst-case situations.
68. Process simulation tests should be performed as initial validation with three consecutive satisfactory simulation tests per shift and repeated at defined intervals and after any significant modification to the HVAC-system, equipment, process and number of shifts. Normally process simulation tests should be repeated twice a year per shift and process.
69. The number of containers used for media fills should be sufficient to enable a valid evaluation. For small batches, the number of containers for media fills should at least equal the size of the product batch. The target should be zero growth and the following should apply:
  - When filling fewer than 5000 units, no contaminated units should be detected.
  - When filling 5,000 to 10,000 units:
    - a) One (1) contaminated unit should result in an investigation, including consideration of a repeat media fill;
    - b) Two (2) contaminated units are considered cause for revalidation, following investigation.
  - When filling more than 10,000 units:
    - a) One (1) contaminated unit should result in an investigation;
    - b) Two (2) contaminated units are considered cause for revalidation, following investigation<sup>1</sup>.
70. For any run size, intermittent incidents of microbial contamination may be indicative of low-level contamination that should be investigated. Investigation of gross failures should include the potential impact on the sterility assurance of batches manufactured since the last successful media fill.
71. Care should be taken that any validation does not compromise the processes.
72. Water sources, water treatment equipment and treated water should be monitored regularly for chemical and biological contamination and, as appropriate, for endotoxins. Records should be maintained of the results of the monitoring and of any action taken.

---

<sup>1</sup> For further details on the validation of aseptic processing, please refer to the PIC/S Recommendation on the Validation of Aseptic Processing (PI 007).

73. Activities in clean areas and especially when aseptic operations are in progress should be kept to a minimum and movement of personnel should be controlled and methodical, to avoid excessive shedding of particles and organisms due to over-vigorous activity. The ambient temperature and humidity should not be uncomfortably high because of the nature of the garments worn.
74. Microbiological contamination of starting materials should be minimal. Specifications should include requirements for microbiological quality when the need for this has been indicated by monitoring.
75. Containers and materials liable to generate fibres should be minimised in clean areas.
76. Where appropriate, measures should be taken to minimise the particulate contamination of the end product.
77. Components, containers and equipment should be handled after the final cleaning process in such a way that they are not recontaminated.
78. The interval between the washing and drying and the sterilisation of components, containers and equipment as well as between their sterilisation and use should be minimised and subject to a time-limit appropriate to the storage conditions.
79. The time between the start of the preparation of a solution and its sterilisation or filtration through a micro-organism-retaining filter should be minimised. There should be a set maximum permissible time for each product that takes into account its composition and the prescribed method of storage.
80. The bioburden should be monitored before sterilisation. There should be working limits on contamination immediately before sterilisation, which are related to the efficiency of the method to be used. Bioburden assay should be performed on each batch for both aseptically filled product and terminally sterilised products. Where overkill sterilisation parameters are set for terminally sterilised products, bioburden might be monitored only at suitable scheduled intervals. For parametric release systems, bioburden assay should be performed on each batch and considered as an in-process test. Where appropriate the level of endotoxins should be monitored. All solutions, in particular large volume infusion fluids, should be passed through a micro-organism-retaining filter, if possible sited immediately before filling.
81. Components, containers, equipment and any other article required in a clean area where aseptic work takes place should be sterilised and passed into the area through double-ended sterilisers sealed into the wall, or by a procedure which achieves the same objective of not introducing contamination. Non-combustible gases should be passed through micro-organism retentive filters.
82. The efficacy of any new procedure should be validated, and the validation verified at scheduled intervals based on performance history or when any significant change is made in the process or equipment.

## STERILISATION

83. All sterilisation processes should be validated. Particular attention should be given when the adopted sterilisation method is not described in the current edition of the European (or other relevant) Pharmacopoeia or when it is used for a product which is not a simple aqueous or oily solution. Where possible, heat sterilisation is the method of choice. In any case, the sterilisation process must be in accordance with the marketing and manufacturing authorisations.
84. Before any sterilisation process is adopted its suitability for the product and its efficacy in achieving the desired sterilising conditions in all parts of each type of load to be processed should be demonstrated by physical measurements and by biological indicators where appropriate. The validity of the process should be verified at scheduled intervals, at least annually, and whenever significant modifications have been made to the equipment. Records should be kept of the results.
85. For effective sterilisation the whole of the material must be subjected to the required treatment and the process should be designed to ensure that this is achieved.
86. Validated loading patterns should be established for all sterilisation processes.
87. Biological indicators should be considered as an additional method for monitoring the sterilisation. They should be stored and used according to the manufacturer's instructions, and their quality checked by positive controls. If biological indicators are used, strict precautions should be taken to avoid transferring microbial contamination from them.
88. There should be a clear means of differentiating products which have not been sterilised from those which have. Each basket, tray or other carrier of products or components should be clearly labelled with the material name, its batch number and an indication of whether or not it has been sterilised. Indicators such as autoclave tape may be used, where appropriate, to indicate whether or not a batch (or sub-batch) has passed through a sterilisation process, but they do not give a reliable indication that the lot is, in fact, sterile.
89. Sterilisation records should be available for each sterilisation run. They should be approved as part of the batch release procedure.

## STERILISATION BY HEAT

90. Each heat sterilisation cycle should be recorded on a time/temperature chart with a sufficiently large scale or by other appropriate equipment with suitable accuracy and precision. The position of the temperature probes used for controlling and/or recording should have been determined during the validation, and where applicable also checked against a second independent temperature probe located at the same position.
91. Chemical or biological indicators may also be used, but should not take the place of physical measurements.

92. Sufficient time must be allowed for the whole of the load to reach the required temperature before measurement of the sterilising time-period is commenced. This time must be determined for each type of load to be processed.
93. After the high temperature phase of a heat sterilisation cycle, precautions should be taken against contamination of a sterilised load during cooling. Any cooling fluid or gas in contact with the product should be sterilised unless it can be shown that any leaking container would not be approved for use.

## **MOIST HEAT**

94. Both temperature and pressure should be used to monitor the process. Control instrumentation should normally be independent of monitoring instrumentation and recording charts. Where automated control and monitoring systems are used for these applications they should be validated to ensure that critical process requirements are met. System and cycle faults should be registered by the system and observed by the operator. The reading of the independent temperature indicator should be routinely checked against the chart recorder during the sterilisation period. For sterilisers fitted with a drain at the bottom of the chamber, it may also be necessary to record the temperature at this position, throughout the sterilisation period. There should be frequent leak tests on the chamber when a vacuum phase is part of the cycle.
95. The items to be sterilised, other than products in sealed containers, should be wrapped in a material which allows removal of air and penetration of steam but which prevents recontamination after sterilisation. All parts of the load should be in contact with the sterilising agent at the required temperature for the required time.
96. Care should be taken to ensure that steam used for sterilisation is of suitable quality and does not contain additives at a level which could cause contamination of product or equipment.

## **DRY HEAT**

97. The process used should include air circulation within the chamber and the maintenance of a positive pressure to prevent the entry of non-sterile air. Any air admitted should be passed through a HEPA filter. Where this process is also intended to remove pyrogens, challenge tests using endotoxins should be used as part of the validation.

## **STERILISATION BY RADIATION**

98. Radiation sterilisation is used mainly for the sterilisation of heat sensitive materials and products. Many medicinal products and some packaging materials are radiation-sensitive, so this method is permissible only when the absence of deleterious effects on the product has been confirmed experimentally. Ultraviolet irradiation is not normally an acceptable method of sterilisation.

99. During the sterilisation procedure the radiation dose should be measured. For this purpose, dosimetry indicators which are independent of dose rate should be used, giving a quantitative measurement of the dose received by the product itself. Dosimeters should be inserted in the load in sufficient number and close enough together to ensure that there is always a dosimeter in the irradiator. Where plastic dosimeters are used they should be used within the time-limit of their calibration. Dosimeter absorbances should be read within a short period after exposure to radiation.
100. Biological indicators may be used as an additional control
101. Validation procedures should ensure that the effects of variations in density of the packages are considered.
102. Materials handling procedures should prevent mix-up between irradiated and nonirradiated materials. Radiation sensitive colour disks should also be used on each package to differentiate between packages which have been subjected to irradiation and those which have not.
103. The total radiation dose should be administered within a predetermined time span.

## **STERILISATION WITH ETHYLENE OXIDE**

104. This method should only be used when no other method is practicable. During process validation it should be shown that there is no damaging effect on the product and that the conditions and time allowed for degassing are such as to reduce any residual gas and reaction products to defined acceptable limits for the type of product or material.
105. Direct contact between gas and microbial cells is essential; precautions should be taken to avoid the presence of organisms likely to be enclosed in material such as crystals or dried protein. The nature and quantity of packaging materials can significantly affect the process.
106. Before exposure to the gas, materials should be brought into equilibrium with the humidity and temperature required by the process. The time required for this should be balanced against the opposing need to minimise the time before sterilisation.
107. Each sterilisation cycle should be monitored with suitable biological indicators, using the appropriate number of test pieces distributed throughout the load. The information so obtained should form part of the batch record.
108. For each sterilisation cycle, records should be made of the time taken to complete the cycle, of the pressure, temperature and humidity within the chamber during the process and of the gas concentration and of the total amount of gas used. The pressure and temperature should be recorded throughout the cycle on a chart. The record(s) should form part of the batch record.

109. After sterilisation, the load should be stored in a controlled manner under ventilated conditions to allow residual gas and reaction products to reduce to the defined level. This process should be validated.

## **FILTRATION OF MEDICINAL PRODUCTS WHICH CANNOT BE STERILISED IN THEIR FINAL CONTAINER**

110. Filtration alone is not considered sufficient when sterilisation in the final container is possible. With regard to methods currently available, steam sterilisation is to be preferred. If the product cannot be sterilised in the final container, solutions or liquids can be filtered through a sterile filter of nominal pore size of 0.22 micron (or less), or with at least equivalent micro-organism retaining properties, into a previously sterilised container. Such filters can remove most bacteria and moulds, but not all viruses or mycoplasmas. Consideration should be given to complementing the filtration process with some degree of heat treatment.
111. Due to the potential additional risks of the filtration method as compared with other sterilisation processes, a second filtration via a further sterilised micro-organism retaining filter, immediately prior to filling, may be advisable. The final sterile filtration should be carried out as close as possible to the filling point.
112. Fibre-shedding characteristics of filters should be minimal.
113. The integrity of the sterilised filter should be verified before use and should be confirmed immediately after use by an appropriate method such as a bubble point, diffusive flow or pressure hold test. The time taken to filter a known volume of bulk solution and the pressure difference to be used across the filter should be determined during validation and any significant differences from this during routine manufacturing should be noted and investigated. Results of these checks should be included in the batch record. The integrity of critical gas and air vent filters should be confirmed after use. The integrity of other filters should be confirmed at appropriate intervals.
114. The same filter should not be used for more than one working day unless such use has been validated.
115. The filter should not affect the product by removal of ingredients from it or by release of substances into it.

## **FINISHING OF STERILE PRODUCTS**

116. Partially stoppered freeze drying vials should be maintained under Grade A conditions at all times until the stopper is fully inserted.
117. Containers should be closed by appropriately validated methods. Containers closed by fusion, e.g. glass or plastic ampoules should be subject to 100% integrity testing. Samples of other containers should be checked for integrity according to appropriate procedures.

118. The container closure system for aseptically filled vials is not fully integral until the aluminium cap has been crimped into place on the stoppered vial. Crimping of the cap should therefore be performed as soon as possible after stopper insertion.
119. As the equipment used to crimp vial caps can generate large quantities of non-viable particulates, the equipment should be located at a separate station equipped with adequate air extraction.
120. Vial capping can be undertaken as an aseptic process using sterilised caps or as a clean process outside the aseptic core. Where this latter approach is adopted, vials should be protected by Grade A conditions up to the point of leaving the aseptic processing area, and thereafter stoppered vials should be protected with a Grade A air supply until the cap has been crimped.
121. Vials with missing or displaced stoppers should be rejected prior to capping. Where human intervention is required at the capping station, appropriate technology should be used to prevent direct contact with the vials and to minimise microbial contamination.
122. Restricted access barriers and isolators may be beneficial in assuring the required conditions and minimising direct human interventions into the capping operation.
123. Containers sealed under vacuum should be tested for maintenance of that vacuum after an appropriate, pre-determined period.
124. Filled containers of parenteral products should be inspected individually for extraneous contamination or other defects. When inspection is done visually, it should be done under suitable and controlled conditions of illumination and background. Operators doing the inspection should pass regular eye-sight checks, with spectacles if worn, and be allowed frequent breaks from inspection. Where other methods of inspection are used, the process should be validated and the performance of the equipment checked at intervals. Results should be recorded.

## QUALITY CONTROL

125. The sterility test applied to the finished product should only be regarded as the last in a series of control measures by which sterility is assured. The test should be validated for the product(s) concerned.
126. In those cases where parametric release has been authorised, special attention should be paid to the validation and the monitoring of the entire manufacturing process.
127. Samples taken for sterility testing should be representative of the whole of the batch, but should in particular include samples taken from parts of the batch considered to be most at risk of contamination, e.g.:



- a) for products which have been filled aseptically, samples should include containers filled at the beginning and end of the batch and after any significant intervention;
  - b) for products which have been heat sterilised in their final containers, consideration should be given to taking samples from the potentially coolest part of the load.
-

## ANNEX 2A

# MANUFACTURE OF ADVANCED THERAPY MEDICINAL PRODUCTS FOR HUMAN USE

## SCOPE

The methods employed in the manufacture of Advanced Therapy Medicinal Products (ATMPs) are a critical factor in shaping the appropriate regulatory control. ATMPs can be defined therefore largely by reference to their method of manufacture. For example, for gene therapy ATMPs, genetic modifications can be obtained through a variety of methods (e.g. viral & non-viral vectors, mRNA, ex vivo and in vivo genome-editing tools). The genetically modified cells can be of human origin (autologous or allogeneic) or of animal origin (xenogeneic cells), either primary or established cell lines. In a medicinal product, the genetically modified cells or gene therapy products can be presented alone or combined with medical devices.

This annex provides additional and specific guidance on the full range of ATMPs (as defined in the glossary) and the active substances that are used in their manufacture. This annex applies both to investigational ATMPs and market-authorised ATMPs. It can also be applied to ATMP manufacturing in hospital settings and for compassionate use programs, where authorised by national law.

Although one of the objectives of this present annex was to prepare a document that would stand for several years, the field is quickly changing. It is recognised that amendments may be necessary to accommodate technological change, to clarify uncertainty or to specifically recognise important alternatives. Comments are therefore invited at any stage of the life of this edition.

This annex is divided into two main parts:

1. Part A contains supplementary guidance and alternative provisions on the manufacture of ATMPs, from control over seed lots and cell banks through to finishing activities and testing.
2. Part B contains further guidance on selected types of ATMPs and its substances.

## APPLICATION OF THIS ANNEX

This annex, along with several other annexes of the Guide to GMP, provides guidance, which supplements that in Part I: *Basic Requirements for Medicinal Products* and in Part II: *Basic Requirements for active pharmaceutical ingredients* of the PIC/S GMP Guide. This annex is not a stand-alone document and should be applied in conjunction with PIC/S GMP guidelines and annexes. It has

however been written in a manner that it could enable development of a standalone guide if integrated with PIC/S GMP Part I, Part II, and related annexes.

Where due to the nature of the product or technical necessities, specific guidance is provided in this annex, compliance with this annex is expected and takes precedence over other sections in the PIC/S GMP Guide unless there are good reasons for not doing so with documented sound scientific rationale applied using QRM principles.

In certain cases, other national laws may be applicable to the starting materials for ATMPs. For example:

- (a) Tissues and cells used as starting materials of ATMPs may be subject to other national legislation that cover donation, procurement, testing, processing, preservation, storage and distribution.
- (b) For blood or blood components used as starting materials for ATMPs, national legislation may provide the technical requirements for the selection of donors and the collection and testing of blood and blood components.

The manufacturing process for ATMPs is product-specific and different design approaches are possible. The appropriate application of GMP should be described, justified in the Clinical Trial Application (CTA) or Marketing Authorisation (MA), and in accordance with national law. Consideration may be given to defining which manufacturing process steps are required to manufacture starting materials, ATMP active substance, or the finished ATMP. In some cases, the manufacturing process between the ATMP active substance and the final product can be defined as continuous.

The manufacture and control of genetically modified organisms also needs to comply with other local, national or regional requirements. Appropriate containment should be established and maintained in facilities where any genetically modified organism is handled. Advice should be obtained according to national law in order to establish and maintain the appropriate Biological Safety Level. GMP should be adhered alongside these requirements.

Table 1 gives examples of where this annex applies. It should be noted that this table is illustrative only and is not meant to describe the precise scope. It should also be understood that adherence to the GMP or GMP principles for the manufacturing steps indicated in the corresponding table is dependent on applicable national legislation. The level of GMP requirements increases from early to later steps in the manufacture of ATMP active substances. The inclusion of some early steps of manufacture within the scope of this annex does not imply that those steps will be routinely subject to inspection by the authorities. According to national legislation more or less stringent approaches on the application of GMP on those early stages may apply.

**Table 1. Illustrative guide to manufacturing activities within the scope of Annex 2A**

Example Products	Application of this Annex (see note <sup>1</sup> )			
Gene therapy: mRNA	Linear DNA template preparation	In vitro cell free transcription	mRNA purification	Formulation, filling
Gene therapy: in vivo viral vectors	Plasmid manufacturing	Establishment of MCB, WCB <sup>2</sup>	Vector manufacturing and purification	Formulation, filling
Gene therapy: in vivo non-viral vectors (naked DNA, lipoplexes, polyplexes, etc.)	Plasmid manufacturing	Establishment of bacterial bank <sup>2</sup>	Fermentation and purification	Formulation, filling
Gene therapy: ex-vivo genetically modified cells	Donation, procurement and testing of starting tissue / cells	Plasmid manufacturing	Ex-vivo genetic modification of cells	Formulation, filling
		Vector manufacturing <sup>3</sup>		
Somatic cell therapy	Donation, procurement and testing of starting tissue / cells	Establishment of MCB, WCB or primary cell lot or cell pool <sup>2</sup>	Cell isolation, culture purification, combination with non-cellular components	Formulation, combination, filling
Tissue engineered products	Donation, procurement and testing of starting tissue / cells	Initial processing, isolation and purification, establish MCB, WCB, primary cell lot or cell pool <sup>2</sup>	Cell isolation, culture, purification, combination with non-cellular components	Formulation, combination, filling

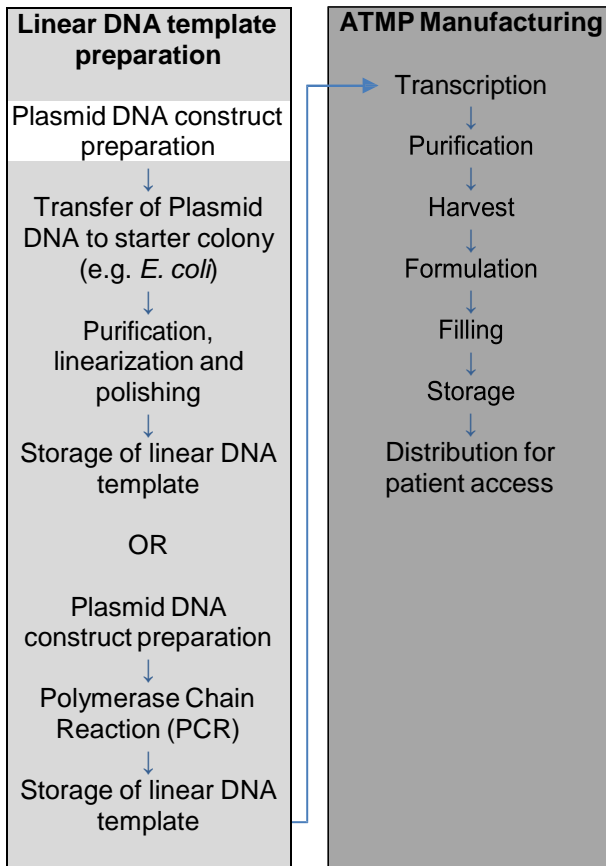
<sup>1</sup> Application of this annex applies to manufacturing steps illustrated in dark grey. Application of this annex or principles of this annex apply to steps illustrated in light grey depending on the requirements of national legislation.

<sup>2</sup> Refer to points 5.32 for establishment of cell banks and seed lots.

<sup>3</sup> In the case of gene therapy ex-vivo genetically modified cells, this guide applies to vector manufacturing except where otherwise authorised by national law where principles of GMP should apply.

The following are some non-exhaustive examples in the application of GMP to the manufacture of ATMP.

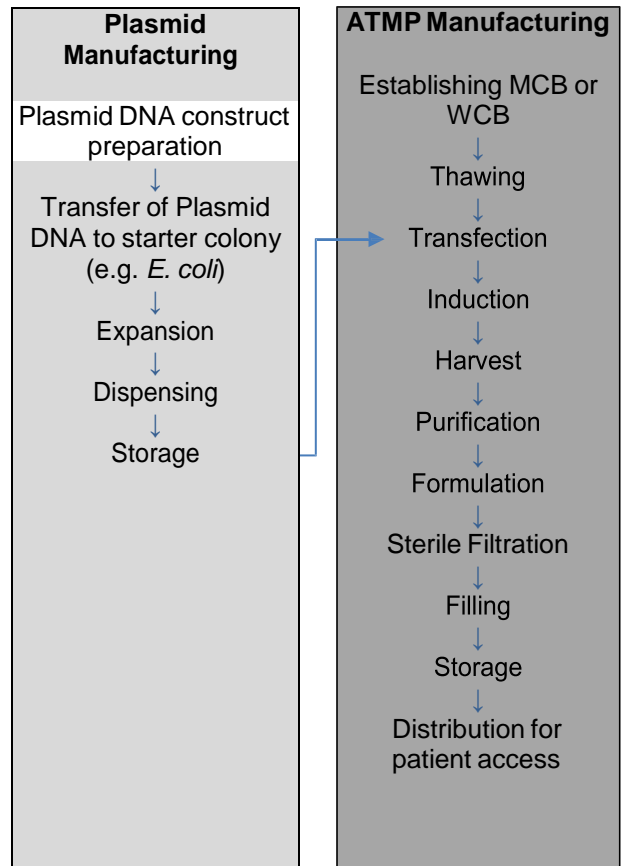
Figure 1: Example of gene therapy mRNA ATMP manufacturing



- GMP requirements can vary from early steps in making the plasmid DNA construct to later steps but should align with Annex 2A and PIC/S GMP Guide Part II or principles of these requirements as applicable under national legislation.
- Refer to Section 5.23 for additional information in determining the appropriate application of GMP.

- A Marketing Authorisation Holder (MAH) may justify these steps to be a continuous process producing both the ATMP active substance and medicinal product.
- PIC/S GMP Part I and Part II along with applicable annexes apply as appropriate to the step of manufacture.

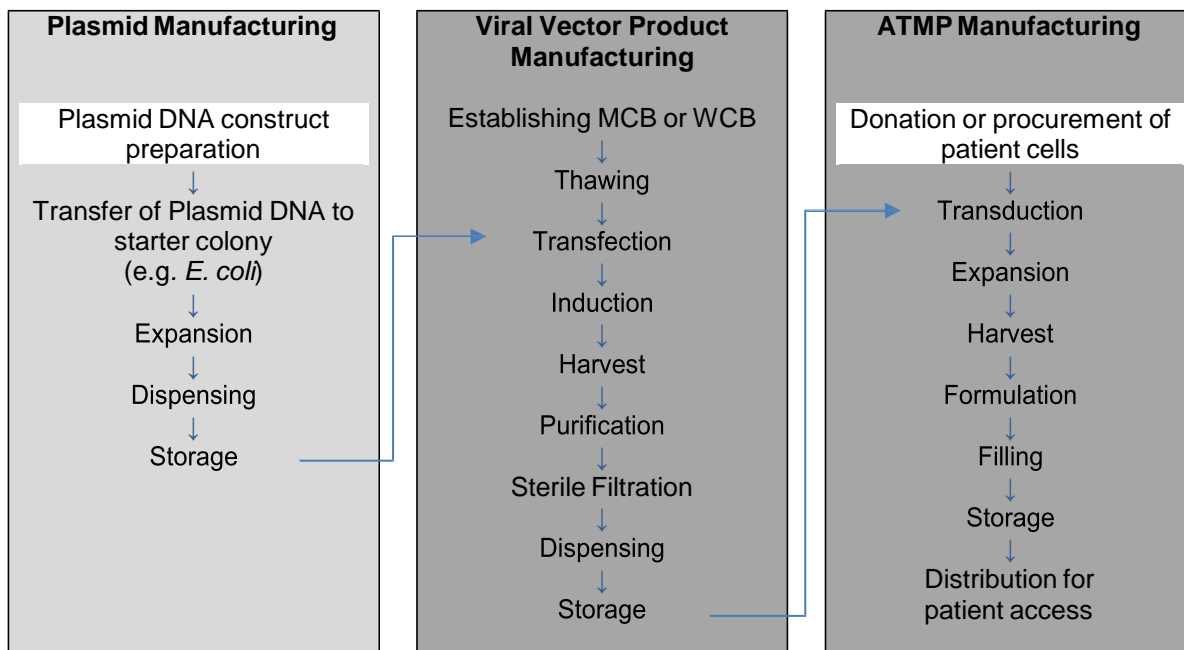
Figure 2: Example of in vivo viral vector gene therapy ATMP manufacturing



- GMP requirements can vary from early steps in making the plasmid DNA construct to later steps but should align with Annex 2A and PIC/S GMP Guide Part II or principles of these requirements as applicable under national legislation.
- Refer to Section 5.23 for additional information in determining the appropriate application of GMP.

- A MAH may justify these steps to be a continuous process producing both the ATMP active substance and medicinal product.
- PIC/S GMP Part I and Part II along with applicable annexes apply as appropriate to the step of manufacture.

Figure 3: Example of autologous CAR-T therapy ATMP manufacturing



- GMP requirements can vary from early steps in making the plasmid DNA construct to later steps but should align with principles of Annex 2A and PIC/S GMP Guide Part II or principles of these requirements as applicable under national legislation.
- Refer to Section 5.23 for additional information in determining the appropriate application of GMP.

- GMP requirements applied to the manufacture of a viral vector should align with Annex 2A and PIC/S GMP Part II or principles of these requirements as applicable under national legislation.
- Refer to Section 5.23 for additional information in determining the appropriate application of GMP.

- The application of this guide does not include the donation or procurement of patient cells.
- A MAH may justify these steps to be a continuous process producing both the ATMP active substance and medicinal product.
- PIC/S GMP Part I and Part II along with applicable annexes apply as appropriate to the step of manufacture.

## PRINCIPLE

The manufacture of ATMPs involves certain specific considerations arising from the nature of the products and the processes. The ways in which biological medicinal products are manufactured, controlled and administered make some particular precautions necessary.

Since materials and processing conditions used in manufacturing processes are designed to provide conditions for the growth of specific cells and microorganisms, this provides an opportunity for extraneous microbial contaminants (e.g. bacteria, fungi) to grow. In addition, some products may be limited in their ability to withstand a wide range of purification techniques, particularly those designed to inactivate or remove adventitious viral

contaminants. The design of the processes, equipment, facilities, utilities, the conditions of preparation and addition of buffers and reagents, sampling and training of the operators are key considerations to minimise such contamination events (i.e. engineering and technical controls). In addition, manufacturing processes need to be well designed and controlled so as not to add further variability to the product.

Product specifications such as those in pharmacopoeial monographs, CTA, and MA will dictate whether and to what manufacturing stage substances and materials can have a defined level of bioburden or need to be sterile. Similarly, manufacturing must be consistent with other specifications set out in the CTA or MA (e.g. number of generations (doublings, passages) between the seed lot or cell bank).

For biological materials that cannot be sterilized (e.g. by filtration), processing must be conducted aseptically to minimise the introduction of contaminants. Where they exist, other guidance documents should be consulted on the validation of specific manufacturing methods (e.g. virus removal or inactivation). The application of appropriate environmental controls and monitoring and, wherever feasible, in-situ cleaning and sterilisation systems together with the use of closed systems and sterile disposable product-contact equipment can significantly reduce the risk of accidental contamination and cross-contamination.

ATMPs require a combination of unique biological methods and standard physico-chemical assays for their Quality Control (QC). For many cell-based products, there is variability introduced through the starting materials that cannot be overcome by the manufacturing process or In-Process Controls (IPCs). Adequate control of the starting and raw materials, well defined characterisation of the ATMP active substance and ATMP drug product release testing form the crucial part of the QC. Controls should take into consideration the intrinsic variability of the biological material needed for ATMP manufacturing. A robust manufacturing process is therefore crucial and in-process controls take on a particular importance in the manufacture of biological active substances and medicinal products.

## **PART A: GENERAL GUIDANCE**

Part A provides alternative or supplementary provisions to respective sections in Part I, II and annexes of the PIC/S GMP Guide, where necessary. Where this annex provides specific guidance for the manufacture of ATMPs (including modification, replacement or redundancy of other sections), this will be clearly indicated. In the absence of specific guidance for ATMPs, compliance with other sections in the PIC/S GMP Guide is expected.

Note: Where the term Marketing Authorisation Holder (MAH) is used, unless otherwise specified, it should be intended to signify the “Sponsor” for investigational ATMP that is used according to a CTA or equivalent.

## **SUPPLEMENTARY PROVISIONS TO PIC/S GMP GUIDE PART I**

### **CHAPTER 1 PHARMACEUTICAL QUALITY SYSTEM**

#### **Pharmaceutical Quality System**

- 1.1 ATMPs are not sold or supplied before an Authorised Person has certified that each production batch has been produced and controlled in accordance with the requirements of the CTA, MA and any other regulations relevant to the production, control and release of medicinal products as applicable. Special provisions apply for the supply of products that have a two-step release process (described in Section 6.14) or such that do not meet release specifications where there is no alternative treatment available (described in Sections 6.11 to 6.13). (Replaces PIC/S GMP Guide Part I Section 1.4, xv)

#### **Quality Risk Management**

- 1.2 GMP applies to the lifecycle stages from the manufacture of investigational ATMP, technology transfer, and commercial manufacturing through to product discontinuation. The biological processes may display inherent variability, so that the range and nature of by-products may be variable. As a result, Quality Risk Management (QRM) principles as detailed in Annex 20 are particularly important for this class of medicinal products and should be used to develop their control strategy across all stages of development and manufacturing steps to minimise variability and to reduce the opportunity for contamination and cross-contamination. (Replaces PIC/S GMP Guide Part I Section 1.2)

### **CHAPTER 2 PERSONNEL**

- 2.1 The health status of personnel should be taken into consideration for product safety. Personnel (including those concerned with cleaning, maintenance or quality control) employed in areas where ATMP active substances and products are manufactured and tested should receive training, and periodic retraining, specific to the products manufactured and to the duties assigned to them, including any specific safety measures to protect product, personnel and the environment.
- 2.2 Any changes in the health status of personnel, which could adversely affect the quality of the product, should prevent work in the production area. Health monitoring of staff should be commensurate with the risk; medical advice should be sought for personnel involved with hazardous organisms. General consideration should be given to Occupational Health & Safety (OH&S) for personnel involved with hazardous substances as required by national law.
- 2.3 Every person entering the manufacturing areas should wear clean protective garments appropriate to the operations to be carried out.

Where required to minimise the opportunity for cross-contamination, restrictions on the movement of all personnel (including QC, maintenance and cleaning personnel) should be controlled based on QRM principles.



In general, personnel should not pass from areas of exposure to live micro-organisms, genetically modified organisms, toxins or animals to areas where other products, inactivated products or different organisms are handled. If such route is unavoidable, a Contamination Control Strategy (CCS) based on QRM principles should be applied (refer to Section 3.4 CCS). (Replaces PIC/S GMP Guide Part I Section 2.18)

## CHAPTER 3 PREMISES AND EQUIPMENT

### PREMISES

#### Production Areas

- 3.1 Cross-contamination should be prevented for all products by appropriate design and operation of manufacturing facilities. The measures to prevent cross-contamination should be commensurate with the risks to product quality. QRM principles should be used to assess and control the risks.

Depending on the level of risk presented by some ATMPs and the materials involved in their production (for example, viruses), it may be necessary to dedicate premises and equipment for manufacturing and/or packaging operations to control the risk. Segregated production areas should be used for the manufacture of ATMPs presenting a risk that cannot be adequately controlled by operational and/or technical measures. (Replaces PIC/S GMP Guide Part I Section 3.6)

- 3.2 Concurrent production of two or more different ATMPs/batches in the same area might be permitted due to adequate operational and/or technical control where justified under QRM principles applied across the entire sequence of manufacturing steps. For example:
- (a) The use of more than one closed isolator (or other closed systems) in the same room at the same time is acceptable, provided that appropriate mitigation measures are taken to avoid cross-contamination or mix-ups of materials.
  - (b) When more than one isolator is used to process different viral vectors within the same room there should be 100% air exhaustion from the room and the facility (i.e. no recirculation). In addition, in case of concurrent production of viral vectors, it is necessary to provide for closed, separate and unidirectional waste handling.
  - (c) The possibility of using more than one biosafety cabinet (BSC) in the same room is only acceptable if effective technical and organisational measures are implemented to separate the activities. The simultaneous use of more than one BSC entails additional risks and, therefore, it should be demonstrated that the measures implemented are effective to avoid risks to the quality of the product and any mix-ups. The rationale should be justified based on QRM principles.
  - (d) The use of multiple closed systems in the same area is permitted, in the case that their close state can be demonstrated. (refer to point 3.13.)

- 3.3 The measures and procedures necessary for containment (i.e. for environment and operator safety) should not conflict with those for product quality.
- 3.4 Special precautions should be taken in the case of manufacturing activities involving infectious viral vectors (e.g. oncolytic viruses, replication competent vectors) that should be segregated based on a documented CCS and QRM principles. The manufacturer should justify the level of segregation required based on the CCS and through QRM principles. The outcome of the QRM process should determine the necessity for and extent to which the premises and equipment should be dedicated to a particular product. In some cases, dedicated facilities, dedicated areas or dedicated equipment may be required in accordance with the national law. Simultaneous incubation and/or storage of replication competent vectors/products, or infected materials/products, with other materials/products is not acceptable.
- 3.5 Air handling units should be designed, constructed and maintained to minimise the risk of cross-contamination between different manufacturing areas and may need to be specific for an area. Consideration, based on QRM principles, should be given to the use of single pass air systems.
- 3.6 If materials (such as culture media and buffers) have to be measured or weighed during the production process, small stocks may be kept in the production area for a specified duration based on defined criteria (e.g. duration of manufacture of the batch or of the campaign). (Replaces PIC/S GMP Guide Part I Section 3.13)
- 3.7 Positive pressure areas should be used to process sterile products, but negative pressure in specific areas at the point of exposure of pathogens is acceptable for containment reasons. Where negative pressure areas or BSCs are used for aseptic processing of materials with particular risks (e.g. pathogens), they should be surrounded by a positive pressure clean zone of appropriate Grade. These pressure cascades should be clearly defined and continuously monitored with appropriate alarm settings as defined by Annex 1. The design of such areas should be such that measures put in place to prevent release of material into the surrounding environment should not compromise sterility assurance level (SAL) of the product and vice versa.
- 3.8 Air vent filters that are directly linked to the sterility of the product (e.g. to maintain the integrity of a closed system) should be hydrophobic, monitored during use (e.g. pressure differential monitoring if appropriate) and validated for their scheduled life span with integrity testing at appropriate intervals based on appropriate QRM principles. If pressure monitoring or integrity testing is technically not feasible for the filter system, vendor supplied information may be considered for approval. However, this has to be taken into account in the CCS as an additional risk factor especially for short shelf life ATMPs, where microbiological quality tests are not available at the time of batch release prior to medical product administration.
- 3.9 Drainage systems must be designed so that effluents can be effectively neutralised or decontaminated to minimise the risk of cross-contamination. They must comply with national law to minimize the risk of contamination of the external environment according to the risk associated with the biohazardous nature of waste materials. (Replaces PIC/S GMP Guide Part I Section 3.11)

- 3.10 The degree of environmental control of particulate and microbial contamination of the production premises should be adapted to the product and the production step, bearing in mind the potential level of contamination of the starting materials and the risks to the product. The microbiological environmental monitoring programme should be supplemented by the inclusion of methods to detect the presence of specific microorganisms (e.g. host organism, yeasts, moulds, anaerobes, etc.) where indicated by the QRM principles.
- 3.11 Where processes are not closed and there is exposure of the product to the immediate room environment without a subsequent microbial inactivation process, (e.g. during additions of supplements, media, buffers, gasses, manipulations) appropriate environmental conditions should be applied. For aseptic manipulations parameters in line with Annex 1 (i.e. Grade A with Grade B background) should be applied. The environmental monitoring program should include testing and monitoring of non-viable contamination, viable contamination and air pressure differentials. The monitoring locations should be determined having regards to the QRM principles. The number of samples, volume, and frequency of monitoring, alert and action limits should be appropriate taking into account the QRM principles. Sampling methods should not pose a risk of contamination to the manufacturing operations. Where appropriate control is required in the process, temperature and relative humidity should be monitored. All environmental monitoring results should be trended.
- 3.12 Only in exceptional circumstances when an appropriate manufacturing environment is not available, a less stringent environment than that specified in Section 3.11 above may be acceptable for processes that are not closed where approved by the Competent Authority and in accordance with CTA or MA or other national requirements. However, this option should be considered exceptional and applicable only if the product is intended to treat a life-threatening condition where no alternative therapeutic options exist. The environment must be specified and justified to provide patient benefit that outweighs the significant risk created by manufacturing under less stringent environments. If the Competent Authority grants an approval, the manufacturer must pursue establishing the appropriate environment as improvements in the technology occur.
- 3.13 For closed systems, a lower classified area than Grade A in background Grade B might be acceptable based on the outcome of a QRM assessment. The appropriate level of air classification and monitoring should be determined having regard to the specific risks, considering the nature of the product, the manufacturing process and the equipment used. QRM should be used to determine whether the technology used supports reduced monitoring, in particular where monitoring can be a source of contamination. This is in addition to:
- (a) The use of technologies as e.g. processing inside single use sterile disposable kits, or processing using closed, automated manufacturing platform or incubation in closed flasks, bags or fermenters in Grade C may be acceptable if adequate control measures are implemented to avoid the risk of microbial contamination and cross-contamination (e.g. appropriate control of materials, personnel flows and cleanliness). Particular attention should be paid if the materials are subsequently moved to a clean area of higher Grade.

- (b) If the closed system can be shown to remain integral throughout the entire usage, a background of Grade D might be acceptable.

Requirements of Annex 1 regarding the provision of closed system should be considered.

- 3.14 In exceptional circumstances, it is permissible to perform a manufacturing step in premises that are not under direct control of the ATMP manufacturer or MAH (including for example placing equipment used to perform manufacturing steps in hospital wards or theatre) where approved by the Competent Authority and in accordance with CTA or MA or other national requirements. In such cases, it should be demonstrated that the process maintains its validated status in accordance to principles and guidelines in Annex 15, Annex 20 and in this annex. These arrangements should be subject to approval by the Competent Authority. The responsibilities of each parties should be defined in written technical agreements.

## EQUIPMENT

- 3.15 Production equipment should not present any hazard to the products. The parts of the production equipment that come into contact with the product must not be reactive, additive or absorptive to such an extent that it will affect the quality of the product and thus present any hazard.

In addition, if single use systems (i.e. disposable systems) are used, the manufacturer should take into account and verify the impact on the product from extractable, leachable, insoluble particulate and insoluble matter derived from such systems. Annex 1 regarding provisions for single use systems should be considered. (Replaces PIC/S GMP Guide Part I Section 3.39)

- 3.16 Where required to minimise the risk of cross-contamination, restrictions on the movement of equipment should be applied. In general, equipment should not be moved from high-risk areas to other areas, or between high-risk areas (e.g. equipment used for the handling of cells from infected donors or the handling of oncolytic viruses). Where the relocation of equipment is unavoidable, after reviewing engineering and/ or technical modifications, the risk should be assessed in line with QRM principles, mitigated and monitored to ensure an effective cross-contamination control strategy (refer to Section 3.4 CCS). The qualification status of the equipment moved should also be considered.
- 3.17 The design of equipment used during handling of live organisms and cells, including those for sampling, should be considered to prevent any contamination during processing.
- 3.18 Primary containment<sup>4</sup> should be designed and periodically tested to ensure the prevention of escape of biological agents into the immediate working environment.

---

<sup>4</sup> See Main GMP Glossary on 'Containment'.

- 3.19 Electronic systems used to support manufacturing must be qualified in accordance with Annex 11 and 15. Any analytical testing performed on materials not used in manufacturing but that support bioinformatics informing the manufacturing process (e.g. patient gene sequencing) should be validated. Such analytical equipment is expected to be qualified prior to use.

## CHAPTER 4 DOCUMENTATION

### Specifications

- 4.1 Specifications for ATMP starting and raw materials may need additional documentation on the source, origin, distribution chain, method of manufacture, and controls applied, to assure an appropriate level of control and oversight including their microbiological quality.
- 4.2 Some products may require specific definition of what materials constitute a batch. For autologous and donor-matched situations, the manufactured product should be viewed as a batch.

### Traceability

- 4.3 Where human cells or tissues are used, full traceability is required from starting and raw materials, including all substances coming into contact with the cells or tissues through to confirmation of the receipt of the products at the point of use whilst maintaining the privacy of individuals and confidentiality of health-related information, according to national legislation.
- 4.4 For starting materials of human origin, the identification of the supplier and the anatomical environment from which the cells/tissues/virus originates (or, as appropriate, the identification of the cell-line, master cell bank, seed lot) should also be described.
- 4.5 A system that enables the bidirectional tracking of cells/tissues contained in ATMPs from the point of donation, through manufacturing, to the delivery of the finished product to the recipient should be created. This system can be manual or automated. It should be used throughout the manufacturing lifecycle to include clinical trial and commercial batches.
- 4.6 Traceability records should be kept as an auditable document and unequivocally linked to the relevant batch record. The storage system should ensure that traceability data allow for easy access, in case of an adverse reaction from the patient.
- 4.7 Traceability records for cellular and tissue-based products and for any personalized ATMP must be retained 30 years after the expiry date of the product unless otherwise specified in the MA/CTA or national law. Particular care should be taken to maintain the traceability of products for special use cases, such as donor-matched cells. National requirements applied to blood components in regard to traceability requirements and notification of serious adverse reactions and events apply to blood components when they are used as starting or raw materials in the manufacturing process of medicinal products. Human cells

including haematopoietic cells must comply with the principles laid down in national law concerning traceability.

- 4.8 When xenogeneic cells are used as starting materials for ATMPs, information permitting the identification of the donor animal should be kept for 30 years unless otherwise specified in the MA/CTA or national legislation.

## CHAPTER 5 PRODUCTION

### General

- 5.1 ATMPs must comply with the applicable national requirements on minimising the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products.

Viral safety for gene therapy ATMPs should be ensured by having systems in place that ensure the quality of starting (including cell banks and viral seed stocks) and raw materials through the production process.

- 5.2 The conditions for sample collection, additions and transfers involving replication competent vectors or materials from infected donors should prevent the release of viral/infected material.

- 5.3 At every stage of processing, materials and products should be protected from microbial and any other contamination. Appropriate contamination control and monitoring strategies should be implemented (refer to Section 3.4 CCS). Particular consideration should be given to the risk of cross-contamination between cell preparations from different donors and, where applicable, from donors having different positive serological markers. (Replaces PIC/S GMP Guide Part I Section 5.10)

- 5.4 The use of antimicrobials may be necessary to reduce bioburden associated with the procurement of living tissues and cells. However, the use of antimicrobials does not replace the requirement for aseptic manufacturing. When antimicrobials are used, their use should be recorded; they should be removed as soon as possible, unless the presence thereof in the finished product is specifically foreseen in the CTA or MA (e.g. antibiotics that are part of the matrix of the finished product). Additionally, it is important to ensure that antimicrobials do not interfere with any product microbial contamination testing or sterility testing, and that they are not present in the finished product (unless specifically justified in the CTA or MA).

- 5.5 Labels applied to containers, equipment or premises should be clear, well defined and in the manufacturer's agreed format.

Care should be taken in the preparation, printing, storage and application of labels, including any specific text for patient-specific or autologous product. For products containing cells derived from human cells or tissue, donor's labels should contain all relevant information that is needed to provide full traceability. In the case of autologous products, the unique patient identifier and the statement "for autologous use only" should be indicated on the outer packaging or, where

there is no outer packaging, on the immediate packaging or as otherwise specified in national law.

Alternative approaches/measures are permitted as long as the risk of erroneous administration of the product is adequately mitigated. For investigational ATMPs that are blinded, the requirement to state “autologous use” can be substituted by a barcode or an alternative equivalent mechanism that ensures blinding while maintaining patient safety. (Replaces PIC/S GMP Guide Part I Section 5.13)

- 5.6 When setting up a programme for primary and secondary packaging operations, particular attention should be given to minimising the risk of cross-contamination, mix-ups or substitutions. Sterility and/or low bioburden requirements should be adhered to and segregation strategies should be applied. (Replaces PIC/S GMP Guide Part I Section 5.49)
- 5.7 If closed systems are used for the production of ATMPs, checks should be carried out to ensure that all pieces of the equipment are connected in a correct manner to assure the closed state. Special attention should be given to apply these tests to automated systems. If feasible and based on QRM principles, for example considering testing carried out by vendors, the integrity of single use systems should be verified at adequate frequency prior to use and potentially post use, possibly automatically. The integrity of reused equipment should be verified before use after cleaning and sterilisation.
- 5.8 A system is no longer considered closed when materials are added or withdrawn without aseptic techniques (e.g. without use of sterile connectors or filters aseptically connected).
- 5.9 Where chromatography equipment is used, a suitable control strategy for matrices, the housings and associated equipment (adapted to the risks) should be implemented when used in campaign manufacture and in multi-product environments. The re-use of the same matrix at different stages of processing is discouraged due to risk of carryover contamination. Any such re-usage should be supported by appropriate validation data. Acceptance criteria, operating conditions, regeneration methods, life span, and sanitization or sterilisation methods of chromatography columns should be defined.
- 5.10 Careful attention should be paid to specific requirements at any cryopreservation stages, e.g. the rate of temperature change during freezing or thawing. The type of storage chamber, placement and retrieval process should minimise the risk of cross-contamination, maintain the quality of the products and facilitate their accurate retrieval. Documented procedures should be in place for the secure handling and storage of products with positive serological markers.
- 5.11 The suitability of selected packaging material should be considered. The adhesiveness, durability and legibility of printed text of labels used for containers that are stored at ultra-low temperatures (- 60 °C or lower) should be verified. Additionally, apply a holistic approach to minimize the risk to container closure integrity (CCI) that can occur during storage at ultra-low temperatures. Evidence-based data should be generated to support the selection of the appropriate primary packaging components and qualification of the container/closure sealing process.

## Prevention of Cross-contamination in Production

5.12 An evidence-based QRM process should be used to assess and control the cross-contamination risks presented by the products manufactured. Factors to take into account include:

- (a) vectors used and the risk of occurrence of replication competent virus (including different level of risk derived from the use of replication limited, replication defective, conditional replication and replication incompetent vectors),
- (b) facility/equipment design and use,
- (c) personnel and material flow,
- (d) microbiological and other adventitious agent controls,
- (e) characteristics of the starting materials/active substance and raw materials,
- (f) process characteristics,
- (g) clean room conditions,
- (h) cleaning processes, and
- (i) analytical capabilities relative to the relevant limits established from the evaluation of the products.

The outcome of the QRM process should be the basis for determining the process workflow and necessity for and extent to which premises and equipment should be dedicated or single use systems should be used for a particular product. This may include dedicating specific product contact parts or dedication of the entire manufacturing facility. It may be acceptable to confine manufacturing activities to a segregated, self-contained production area within a multiproduct facility, where justified. Results should be reviewed jointly with the CCS.

(Replaces PIC/S GMP Guide Part I Section 5.20)

5.13 The methods used for sterilisation, disinfection, virus removal or inactivation should be validated. In cases where a virus inactivation or removal process is performed during manufacture, measures to avoid the risk of recontamination should be taken. (refer to Section 5.19(a))

5.14 An emergency plan for dealing with accidental release of viable organisms should be in place. This should address methods and procedures for containment, protection of operators, cleaning, decontamination and safe return to use. Accidental spillages, especially of live organisms, must be dealt with quickly and safely. Decontamination measures should be available for each organism or groups of related organisms in line with the QRM process. Decontamination measures should be validated for effectiveness.

5.15 If obviously contaminated, such as by spills or aerosols, or if a potential hazardous organism is involved, production and control materials, including



paperwork, must be adequately disinfected, or the information transferred out by other means. An assessment of the impact on the immediate products and any others in the affected area should also be made.

- 5.16 The risks of cross-contamination should be assessed having regard to the characteristics of the product (e.g. biological characteristics of the starting materials, possibility to withstand purification techniques) and manufacturing process (e.g. the use of processes that provide extraneous microbial contaminants the opportunity to grow). For ATMPs that cannot be sterilised, any open processing (e.g. filling) must be conducted aseptically to minimise the introduction of contaminants.
- 5.17 In all manufacturing steps that may lead to unwanted formation of aerosols (e.g. centrifugation, working under vacuum, homogenisation, and sonication) appropriate mitigation measures should be implemented to avoid cross-contamination. Special precautions should be taken when working with infectious materials.
- 5.18 Measures to prevent cross-contamination appropriate to the risks identified should be put in place. Measures that can be considered to prevent cross-contamination include, among others:
- (a) segregated premises,
  - (b) dedicating the entire manufacturing facility or a self-contained production area on a campaign basis (separation in time) followed by a cleaning process of validated effectiveness,
  - (c) adequate cleaning procedures:
    - i. the cleaning procedure (technique, number of sanitation steps, etc.) should be adapted to the specific characteristics of the product and of the manufacturing process;
    - ii. a risk-assessment should be used to determine the cleaning and decontamination procedures that are necessary, including the frequency thereof;
    - iii. as a minimum, there should be appropriate cleaning and decontamination between each batch; and
    - iv. all cleaning and decontamination procedures should be validated.
  - (d) use of “closed systems” for processing and for material or product transfer between individual processing equipment,
  - (e) use of air locks and pressure cascade to confine potential airborne contaminant within a specified area,
  - (f) utilisation of single use systems,
  - (g) other suitable organisational measures, such as the:

- i. dedication of certain parts of equipment (e.g. filters) to a given type of product with a specific risk profile;
- ii. keeping specific protective clothing inside areas where products with high-risk of contamination are processed;
- iii. implementing adequate measures to handling waste, contaminated rinsing water and soiled gowning; and
- iv. imposing restrictions on the movement of personnel.

(Replaces PIC/S GMP Guide Part I Section 5.21)

## Validation

5.19 During process validation potential limited availability of quantities of tissue/cells has to be taken into account. A strategy on gaining maximum process knowledge has to be implemented.

Validation studies should be conducted in accordance with defined procedures. Results and conclusions should be recorded, in particular:

- (a) ATMPs manufactured for exploratory, early phase clinical trials (phase I and phase I/II), are expected to be validated proportionately with the knowledge and the risk associated with the respective phase. All aseptic and sterilisation processes as well as virus inactivation or removal for investigational and authorised ATMPs are expected to be validated. The effectiveness of disinfection methods should be proven. For all phases, the principles as outlined in Annex 13 should be applied.
- (b) For all aseptic processes, aseptic process simulations should be performed as part of initial validation and repeated thereafter every six months in line with Annex 1. In the case of infrequent production (i.e. if the interval between the production of two batches is more than six months but less than a year), it is acceptable that the process simulation test is done prior to manufacturing of the next batch. This is provided that, the results of the process simulation test are available prior to the starting of production. Any deviation from this approach needs to be thoroughly justified by QRM principles considering all aspects of product nature, product quality and patient safety.
- (c) If the ATMP is not produced on a routine basis (i.e. over a year), the aseptic process simulation should be conducted at least in triplicate prior to the start of manufacturing, involving all relevant operators. QRM principles should be applied in accordance with Annex 1. Any deviation from this approach needs to be thoroughly justified by QRM principles considering all aspects of product nature, product quality and patient safety.
- (d) The use of surrogate material during process validation may be acceptable when there is shortage of the starting materials (e.g. autologous ATMPs, allogeneic in a matched-donor scenario, allogeneic where there is no expansion of cells to MCB). The representativeness of surrogate starting material should be evaluated, including – for example – donor age, use of materials from healthy donors, anatomical source (e.g. femur vs. iliac crest)

or other different characteristics (e.g. use of representative cell-types or use of cells at a higher passage number than that foreseen in the product specifications).

- (e) Where possible, consideration should be given to complementing the use of surrogate materials with samples from the actual starting materials for key aspects of the manufacturing process. For instance, in the case of an ATMP based on modification of autologous cells to treat a genetic disorder, process validation using the autologous cells (affected by the condition) may be limited to those parts of the process that focus on the genetic modification itself. Other aspects could be validated using a representative surrogate cell type.

(Replaces PIC/S GMP Guide Part I Section 5.23)

### **Control of different types of materials including ATMP Active Substances**

- 5.20 For the approval and maintenance of suppliers of materials, the following is required:

#### ATMP Active substances

The supply chain traceability should be established. Associated risks, from active substance starting materials to the finished medicinal product, should be formally assessed and periodically verified. Appropriate measures should be put in place to reduce risks to the quality of the active substance.

The supply chain and traceability records for each active substance should be available and be retained by the manufacturer of the ATMP.

#### Raw materials and process aids

Prior to setting up the manufacturing process and whenever a change of the respective material is implemented, a QRM process should assess the risk of contamination from the relevant materials as well as their influence on the entire manufacturing process and the resulting product. Appropriate measures should be put in place to reduce risks to the quality of the materials.

#### Material directly in contact with the ATMP during manufacture and storage

All materials that come in direct contact with the ATMP should be of appropriate quality. The risk of microbiological contamination should be assessed especially for single use systems.

(Replaces PIC/S GMP Guide Part I Section 5.29)

- 5.21 Only materials that have been released by the Quality Unit and that are within their expiration or retest date should be used. Where the results of necessary tests are not available, it may be permissible to process materials before the results of the tests are available, the risk of using a potentially failed material and its potential impact on other batches should be clearly described and assessed under the principles of QRM. In such cases, release of a finished product is

conditional on satisfactory results of these tests. (Replaces PIC/S GMP Guide Part I Section 5.34)

- 5.22 A regular qualification of the vendors (e.g. manufacturers and distributors) of all materials to confirm that they comply with the relevant GMP requirements should be performed. Whether an on-site audit needs to be performed at a manufacturer's or distributor's premises should be defined based on QRM principles. Generally, audits need to be performed at vendors of all materials defined as critical for the manufacturing process according to its product risk profile (PRP). Refer to provisions detailed in Chapter 7 as modified by this annex.
- 5.23 Application of QRM principles to the total supply chain is a critical part of the process to understand the risks to material quality. The principles of quality by design (QbD) as described in ICH Q8 Guideline on Pharmaceutical Development could be applied:
- (a) The MAH should define what constitutes ATMP active substances, starting materials, raw materials and other materials such as single use systems, primary packaging materials and any other materials in direct contact with the product during manufacture by means of Product Risk Profiles (PRP). The PRP should be used to justify the levels of control that apply to individual materials.
  - (b) Establish the Quality Target Product Profile (QTPP) and define the Critical Quality Attributes (CQA) and the Critical Process Parameters (CPP) for the ATMP to establish PRP appropriately.
  - (c) For each material used, identify the risks presented to the quality, safety and function from its source through to its incorporation in the finished product dosage form. Areas for consideration should include, but are not limited to:
    - i. transmissible spongiform encephalopathy;
    - ii. potential for viral contamination;
    - iii. potential for microbiological or endotoxin/pyrogen contamination;
    - iv. potential, in general, for any impurity originating from the raw materials, or generated as part of the process and carried over;
    - v. sterility assurance for materials claimed to be sterile;
    - vi. potential for any impurities carried over from other processes, in absence of dedicated equipment and/or facilities;
    - vii. environmental control and storage/transportation conditions including cold chain management; if appropriate and
    - viii. stability.
  - (d) With respect to the use and function of each material, consider the following:

- i. pharmaceutical form and use of the medicinal product containing the material;
  - ii. function of the material in the formulation, and for gene therapy products the impact on the gene expression of that material;
  - iii. degree of which the function of the final product is dependent from the material assessed and how likely it is to be controlled further into the manufacturing process (i.e. if the gene sequence is wrong how easily can this be detected and corrected or if the product is contaminated how likely can this be detected or corrected later in the manufacturing process);
  - iv. time of preparation of the material in respect to the time of administration of the final product;
  - v. quantity of material with particular reference to the implication of small final product batch sizes (e.g. 5-50 mg);
  - vi. any known quality defects/fraudulent adulterations, both globally and at a local company level related to the material;
  - vii. known or potential impact on the CQA and CPP of the ATMP; and
  - viii. other factors as identified or known to be relevant to assuring patient safety.
- (e) Document the risk profile as low, medium, or high based on the above assessment and use this outcome to determine the PRP. On this basis, the MAH should establish and document the elements of PIC/S GMP that are needed to be in place in order to control and maintain the QTPP.
- (f) Once the PRP and the appropriate GMP have been defined, ongoing risk review should be performed through mechanisms such as:
- i. number of defects connected to batches of respective material received;
  - ii. type/severity of such defects;
  - iii. monitoring and trend analysis of material quality;
  - iv. observation of trends in drug product quality attributes; this will depend on the nature and role of material; and
  - v. observed organisational, procedural or technical/process changes at the material manufacturer.
- (g) Incorporate the PRP into the CTA or MA as applicable.
- (h) The QTPP, once approved in the production process by the Competent Authority, should guide the manufacturer through what controls are important and expected and which can be exempted. The manufacturer should have a

control strategy established that justifies the level of testing performed for incoming starting materials.

- 5.24 Particular attention should be paid to avoiding contamination and to minimising the variability of the materials. Specifications related to the product (such as those in pharmacopoeial monographs, CTA, or MA), will dictate whether and to what stage substances and materials can have a defined level of bioburden or need to be sterile.
- 5.25 For products where final sterilisation is not possible and the ability to remove microbial by-products is limited, the controls required for the quality of materials and on the aseptic manufacturing process assume greater importance. Where a CTA or MA provides for an allowable type and level of bioburden, for example at the ATMP active substance stage, the control strategy should address the means by which this is maintained within the specified limits.
- 5.26 The selection, qualification, approval and maintenance of suppliers of starting materials, raw materials and materials that come in direct contact with the products during manufacture and storage (e.g. single use systems) together with their purchase and acceptance should be documented as part of the pharmaceutical quality system. The level of oversight should be proportionate to the risks posed by the individual materials taking account of their source, manufacturing process, supply chain complexity and the final use to which the material is put in the ATMP. The supporting evidence for each supplier / material approval should be maintained. Personnel involved in these activities should have a current knowledge of the suppliers, the supply chain and the associated risks involved. Where possible, these materials should be purchased directly from the manufacturer or a manufacturer approved supplier. (Replaces PIC/S GMP Guide Part I Section 5.27)
- 5.27 For starting material of human origin, the agreement between the ATMP manufacturer (or, as appropriate, the MAH) and the supplier (including blood and tissue establishments) should contain clear provisions about the transfer of information. In particular, this should include test results performed by the supplier, traceability data, and transmission of health donor information that may become available after the supply that may have an impact on the quality or safety of the ATMPs manufactured. National laws that are required as part of the donation and procurement of human blood and blood components, haematopoietic progenitor cells, human tissues and cells for manufacturing purposes need to be adhered to. (Replaces PIC/S GMP Guide Part I Section 5.28)
- 5.28 The quality requirements established by the manufacturer in the MA or CTA for materials classified as critical during QRM process (according to PRP profile) should be discussed and agreed with the suppliers during the product life cycle. Appropriate aspects of the production, testing and control, including handling, labelling, packaging and distribution requirements, complaints, recalls and rejection procedures should be documented in a formal quality agreement. (Replaces PIC/S GMP Guide Part I Section 5.28)

## Human Blood, Tissues and Cells Used as Starting Materials

- 5.29 The donation, procurement and testing of human blood, tissues and cells used as starting materials for ATMPs should be in accordance with the applicable national law.
- (a) The procurement, donation and testing of blood, cells and tissues is regulated in some countries. Such supply sites must hold appropriate approvals from the Competent Authority(ies) which should be verified as part of supplier management.
  - (b) For cell therapies, the maintenance of the aseptic processing from time of procurement of cells through manufacturing and administration back into the patient should be ensured.
  - (c) Where such human cells or tissues are imported, they must meet equivalent national standards of quality and safety. The traceability and serious adverse reaction and serious adverse event notification requirements may be set out in national law.
  - (d) There may be some instances where processing of blood, tissues and cells used as starting materials for ATMPs will be conducted at blood or tissue establishments. This is permissible only if authorised by national law (e.g. the material would be otherwise compromised and processing involves only minimal manipulation).
  - (e) Blood, tissue and cells are released by the Responsible Person (RP) in the blood or tissue establishment before shipment to the ATMP manufacturer. After that, normal medicinal product starting material controls apply. The test results of all tissues / cells supplied by the tissue establishment should be available to the manufacturer of the medicinal product. Such information must be used to make appropriate material segregation and storage decisions. In cases where manufacturing must be initiated prior to receiving test results from the tissue establishment, tissue and cells may be shipped to the medicinal product manufacturer, provided controls are in place to prevent cross-contamination with tissue and cells that have been released by the RP in the tissue establishment.
  - (f) A technical agreement clearly defining the responsibilities should be in place between all involved parties (e.g. manufacturers, tissue establishment, sponsors, MAH).
  - (g) The transport of blood, tissues and cells to the manufacturing site must be controlled by a written agreement between the responsible parties. The manufacturing sites should have documentary evidence of adherence to the specified storage and transport conditions.
  - (h) Continuation of traceability requirements started at tissue establishments through to the recipient(s), and vice versa, including materials in contact with the cells or tissues should be maintained.

## Seed Lot and Cell Bank System

- 5.30 A system of master and working virus seed lots and/or cell banks is recommended if the production of allogeneic ATMP involves cell culture or propagation in embryos and animals. This can prevent the unwanted drift of properties, which might ensue from repeated subcultures or multiple generations.
- 5.31 The number of generations (doublings, passages) between the seed lot or cell bank, the active substance and finished product should be consistent with specifications in the MA or CTA.
- 5.32 As part of product lifecycle management, establishment of seed lots and cell banks, including master and working generations, as well as maintenance and storage, should be performed under appropriate GMP conditions. This should include an appropriately controlled environment to protect the seed lot and the cell bank and the personnel handling it. During the establishment of the seed lot and cell bank, no other living or infectious material (e.g. virus, cell lines or cell strains) should be handled simultaneously in the same area or by the same persons. For all stages prior to the establishment of the master seed or cell bank generation, principles of GMP may be applied. For all pre-master bank stages, documentation should be available to support traceability. All issues related to components used during the development with potential impact on product safety (e.g. reagents of biological origin) from initial sourcing and genetic development should be documented.
- 5.33 Following the establishment of master and working cell banks and master and working seed lots, quarantine and release procedures should be followed. This should include adequate characterisation and testing for contaminants. Their on-going suitability for use should be further demonstrated by the consistency of the characteristics and quality of the successive batches of product. Evidence of the stability and recovery of the seeds and banks should be documented and records should be kept in a manner permitting trend evaluation.
- 5.34 Seed lots and cell banks should be stored and used in such a way as to minimise the risks of contamination (e.g. stored in the vapour phase of liquid nitrogen in sealed containers) or alteration. Control measures for the storage of different seeds and/or cells in the same area or equipment should prevent mix-up and take into account the infectious nature of the materials to prevent cross-contamination.
- 5.35 Cell based ATMPs are often generated from a cell stock obtained from limited number of passages. In contrast with the two-tiered system of Master and Working cell banks, the number of production runs from a cell stock is limited by the number of aliquots obtained after expansion and does not cover the entire life cycle of the product. Cell stock changes should be addressed in the MA/CTA and thereby covered by a validation and comparability protocol, as the inter-donor variability may change the product.
- 5.36 Storage containers should be sealed, clearly labelled and kept at an appropriate temperature. A stock inventory must be kept. The storage temperature and, where used, the liquid nitrogen levels should be continuously monitored. Deviation from set limits and corrective and preventive action taken should be recorded.



- 5.37 It is desirable to split stocks and to store the split stocks at different locations to minimise the risks of total loss. The controls at such locations should provide the assurances outlined in the preceding paragraphs.
- 5.38 The storage and handling conditions for stocks should be managed according to the same procedures and parameters. Once containers are removed from the seed lot / cell bank management system, the containers should not be returned to stock.

## CHAPTER 6 QUALITY CONTROL

- 6.1 In-process controls have a greater importance in ensuring the consistency of the quality of ATMPs than for conventional products. In-process control testing should be performed at appropriate stages of production to control those conditions that are important for the quality of the finished product.

### General

- 6.2 The head of quality control is responsible for control of ATMP active substances, starting materials, raw materials and other materials such as primary packaging materials and any other material in direct contact with the product during manufacture as well as medical devices that are used in combined ATMPs. Further, the head of quality control is responsible to control the quality of the ATMP throughout all stages of manufacture. In case of autologous products or allogeneic products in a donor-matched scenario, the match between the origin of the starting material and the recipient should be verified.
- 6.3 Samples should be representative of the batch of materials or products from which they are taken. Other samples may also be taken to monitor the worst-case part of a process (e.g. beginning or end of a process). The sampling plan used should be appropriately justified and based on a risk management approach. Certain types of cells (e.g. autologous cells used in ATMPs) may be available in limited quantities and, where allowed in the CTA or MA, a modified testing and sample retention strategy may be developed and documented. (Replaces PIC/S GMP Guide Part I Section 6.12)
- 6.4 Sample containers should bear a label indicating the contents, with the batch number, the date of sampling and the containers from which samples have been drawn. They should be managed in a manner to minimize the risk of mix-up and to protect the samples from adverse storage conditions. When containers are too small, the use of a qualified bar code or other means that permit access to this information should be considered. (Replaces PIC/S GMP Guide Part I Section 6.13)
- 6.5 In line with requirements of Annex 19, a reference sample of a batch of starting material, raw materials, packaging material and finished product should be drawn. As a general principle, a reference sample should be of sufficient size to permit the carrying out on at least two occasions of the full analytical controls on the batch foreseen in the CTA or MA. In case of a continuous process, where the ATMP active substance will immediately be turned into the ATMP drug product, only a reference sample of the ATMP drug product needs to be drawn. However, it is acknowledged that drawing reference samples may not always be feasible

due to scarcity of the materials or limited size of the batches (e.g. autologous products, allogeneic products in a matched donor scenario, products for ultra-rare diseases, and products for use in first-in-man clinical trials with a very small-scale production). In these cases, alternative approaches should be justified and authorised in the corresponding CTA/MA.

- 6.6 Samples of the starting materials should generally be kept for two years after the batch release. However, it is acknowledged that the retention of samples may be challenging due to scarcity of the materials. Due to this intrinsic limitation, it is justified not to keep reference samples of the cells/tissues used as starting materials in the case of autologous ATMPs and certain allogeneic ATMPs (i.e. matched donor scenario). In other cases, where the scarcity of the materials is also a concern, the sampling strategy may be adapted based on risk assessment and appropriately implemented mitigation measures. For cases where the starting material is an established cell bank system, there is no need to keep cell bank vials specifically for the purpose of reference samples.
- 6.7 In line with requirements of Annex 19, a sample of a fully packaged unit (retention sample) should be kept per batch for at least one year after the expiry date (national requirements might differ). A retention sample is, however, not expected in the case of autologous products or allogeneic products, where justified (e.g. in a matched donor scenario), as the unit produced with the patient's tissues/cells constitutes what should be administered to the patient. When it is not possible to keep a retention sample, photographs or copies of the label are acceptable for inclusion in the batch records.
- 6.8 Shorter retention periods as mentioned in Section 6.6 and 6.7 might be justified based on the stability and shelf life of the product. In cases of short shelf life, the manufacturer should consider if the retention of the sample under conditions that prolong the shelf life (such as cryopreservation) is representative for the intended purpose. For instance, cryopreservation of fresh-cells may render the sample inadequate for characterisation purposes but the sample may be adequate for sterility or viral safety controls (the volume of the samples can be reduced according to the intended purpose). When cryostorage of a sample is considered inadequate for the intended purpose, the manufacturer should consider alternative approaches that are scientifically justified.

### **On-going stability programme**

- 6.9 The protocol for the on-going stability programme can be different from that of the initial long term stability study as submitted in the MA dossier provided that this is justified and documented in the protocol (e.g. the frequency of testing, or when updating to ICH/VICH recommendations). Stability studies on the reconstituted and thawed product are performed during product development and need not be monitored on an on-going basis. The use of surrogate materials (i.e. material derived from healthy volunteers) or alternative scientifically sounds approaches are acceptable in case of autologous products (or matched donor scenario) where the entire batch needs to be administered to the patient. (Replaces PIC/S GMP Guide Part I Section 6.31)

## Release

- 6.10 In general, batches of ATMPs should only be released for sale or supply to the market after certification by an Authorised Person. The batch release specifications are not limited to analytical results (also refer to out of specification (OOS) results). In line with PIC/S GMP Guide Part I Sections 1.4 (xv), 2.6. and 6.34 the Authorised Person should assess the quality of each batch considering processing records, results from environmental monitoring, monitoring of process parameters, analytical results and all deviations from standard procedures and protocols. Until a batch is certified, it should remain at the site of manufacture or be shipped under quarantine to another site, which has been approved for that purpose by the relevant Competent Authority (if applicable) and is controlled appropriately within the manufacturer's quality system. Generally, a finished product that does not meet release specifications should not be administered to a patient unless otherwise justified.
- 6.11 Where authorised by national law, the administration of a product that does not meet the release specification might be performed under exceptional circumstances (such as when there is no alternative treatment available that would provide the same therapeutic outcome and the administration of the failed products could be lifesaving).
- 6.12 In cases, referred to in point 6.11, where product does not meet release specification, the responsibility and the decision of the patient treatment are solely of the treating physician and are beyond the remit of this PIC/S annex. The Authorised Person, the MAH and/or the Sponsor of the clinical trial should consider the following in making the product available:
- The treating physician should provide in writing a rationale and/or request to the Authorised Person and MAH.
- (a) Batch manufacturing records and documentation provided to the treating physician should clearly state that the batch has failed the release specifications and describe the parameters that have not been met.
  - (b) When responding to a treating physician's request, the MAH should provide its evaluation of the risks of product administration. However, it is solely the physician's decision to administer the finished product that does not meet release specifications.
  - (c) The Authorised Person (or delegate) should report the supply of the product to the relevant Competent Authorities, on behalf of the MAH in accordance with their legal obligations.
- 6.13 The clinical trial Sponsor or MAH should have procedures in place that describe steps to be taken if product does not meet release specification but may be released to permit treatment. Individual instances that do not meet release specifications may be addressed through lot-by-lot release programmes and specific case-by-case, risk-based assessments, where such programs exist within national law.

- 6.14 For ATMPs with a short shelf life, where established analytical tests might not permit batch certification prior to product administration, alternative methods of obtaining equivalent data should be considered (e.g. rapid microbiological methods).

Subject to approval from the Competent Authority, batch certification of short shelf life products performed prior to completion of all product quality control is permitted when the testing timelines would not allow for effective distribution to a patient.

- (a) A suitable control strategy must be in place, built on enhanced understanding of the product and process performance. This must take into account the controls and attributes of starting materials, raw materials and intermediates.
- (b) The procedure for batch certification should provide an exact and detailed description of the entire release procedure, including responsibilities of the different personnel involved in assessment of production and analytical data.
- (c) The procedure for batch certification and release of short shelf life ATMP may be carried out in two or more stages:
  - i. Assessment by designated person(s) of batch processing records, results from environmental monitoring (where available) which should cover production conditions, all deviations from standard procedures and protocols as well as the available analytical results for review in preparation for the initial certification by the Authorised Person.
  - ii. Assessment of the final analytical tests and other information available for final certification by the Authorised Person. A procedure should be in place to describe the measures to be taken (including liaison with clinical staff) where out of specification test results are obtained. Such events should be fully investigated and the relevant corrective and preventive actions taken to prevent recurrence.
- (d) Increased reliance on process validation should be considered as supporting data for batch release in absence of a complete analytical results panel, even in case of investigational ATMP.
- (e) A continuous assessment of the effectiveness of the pharmaceutical quality system must be in place. This includes the records being kept in a manner, which permits trend evaluation.

## **Batch release process in cases of decentralised / point of care manufacturing**

- 6.15 In the exceptional circumstances where approved by the Competent Authority and in accordance with CTA or MA or other national requirements, manufacturing of the ATMP may take place in sites close to the patient (e.g. ATMPs with short shelf life, clinical advantage of using fresh cells as opposed to freezing the starting materials/finished product, advantages of using automated equipment, etc.). This includes manufacturing models where partial manufacturing occurs at a central site and finishing occurs at a local site. It also includes manufacturing models where there are no steps occurring at a central site and the active substance is provided to a number of local sites where full manufacture occurs. In such cases, steps in the manufacturing of the ATMPs may occur in multiple sites that may be also located in treatment centres (point of care) including hospitals. National law might require GMP-manufacturing authorisations and/ or authorisations for the procurement and/or manufacture of blood, cells and tissues intended to be used for ATMP manufacturing at the central site and the satellite sites.
- 6.16 The batch certification and release process becomes particularly important in the case of ATMPs manufactured under a decentralised system as manufacturing in multiple sites increases the risk of variability for the product. In particular, through the batch certification and release process it must be ensured that each batch released at any of the sites has been manufactured and quality controlled in accordance with the requirements of the CTA or MA and other relevant regulatory requirements including compliance with GMP. The steps of the batch certification and release process should be clearly documented in a standard operating procedure (SOP). The following conditions need to be respected:
- (a) A "responsible site", should be identified. The responsible site is responsible for the oversight of the decentralised sites. During the product life cycle, the responsible site:
- i. must have availability of an Authorised Person;
  - ii. must ensure that those involved in the batch certification and release process are adequately qualified and trained for their tasks;
  - iii. should perform audits to confirm compliance with the batch certification and release process (as described in SOP);
  - iv. must ensure that there is a written contract/technical agreement between the responsible site and the decentralised sites establishing the responsibilities of each party, and
  - v. must ensure that there are written arrangements to:
    - timely report quality defects, deviations or non-conformity to the central site;
    - ensure deviations are investigated to identify root cause(s) and implement corrective and preventive measures as appropriate; and

- ensure deviations are approved by a delegated person (after having assessed the impact on quality, safety and efficacy), with the involvement of the Authorised Person as appropriate.
- (b) The Authorised Person should have ultimate responsibility for the batch certification (responsibility cannot be delegated). However, it should be possible for the Authorised Person of the responsible site to rely on data/information that is transmitted to the Authorised Person by qualified and trained personnel at the decentralised sites.

When permitted by national law, the Authorised Person may delegate release to trained and qualified personnel at the decentralised site to act under the direction of the Authorised Person for exceptional situations (e.g. life threatening cases or off-hours). The following conditions apply:

- i. There is a detailed algorithm that determines the cases when the product can be released at the local site without the preliminary approval of the Authorised Person, including deviations that do not require the intervention of the Authorised Person. If technology permits this step can be performed by a validated computer system.
- ii. The Authorised Person reviews all releases that have occurred at a decentralised site within an appropriately justified timeframe to confirm the adequacy of the releases including:
  - determining that the local sites can continue release;
  - if any product needs to be recalled or a product alert needs to be issued (see recall section in Chapter 8);
  - if any provision in the release procedure and /or technical agreement needs modification; and
  - the product has not been released without Authorised Person authorisation when required.

## CHAPTER 7 OUTSOURCED ACTIVITIES

### OTHERS

- 7.1 Collection of starting materials and highly specialised testing in the jurisdictions that are subject to licensing (e.g. karyotype testing, exome sequencing) can be outsourced to non GMP licensed third party, as allowed by national law, provided:
- (a) there is a rationale and a justification in the quality system;
  - (b) the contract giver takes responsibility to ensure that the contract acceptor demonstrates an appropriate level of GMP commensurate to the risk to the product and the activities performed using the principles of Annex 20; and

- (c) that proportionate qualifications/validations as appropriate are conducted (with reference to Annex 15 and Annex 20) to demonstrate that the activities are not detrimental to the quality of the product manufactured.

## **CHAPTER 8 COMPLAINTS AND PRODUCT RECALL**

### **PRODUCT RECALLS AND OTHER POTENTIAL RISK-REDUCING ACTIONS**

- 8.1 If additional donor (human or animal) health information becomes available after procurement, which affects product quality, a 'look-back' procedure needs to be initiated. This involves an analysis of the risk(s) and of the need for corrective or preventive measures.
- 8.2 In addition to recalls, other risk-reducing actions may be considered to manage the risks presented by quality defects, such as the transmission of appropriate information to healthcare professionals which may be important for:
  - (a) a single batch product (e.g. autologous ATMP where the entire batch has been administered), or
  - (b) products where patient treatment interruption presents a higher risk than continued use of the recalled product.

In such cases, the MAH/manufacturee needs to provide information to the treating physician and to the Competent Authority. Quality defect notifications, pharmacovigilance signals and other notifications should also be sent as set in national law.

(Replaces PICS GMP Guide Part I Section 8.31)

- 8.3 In order to test the robustness of the recall procedure (or healthcare professional notification) consideration should be given to performing mock recall or mock transmission of appropriate information to healthcare professionals. Such evaluations should extend to both within office-hour situations as well as out-of-office hour situations.

The frequency of the mock recall (or mock transmission of appropriate information to healthcare professionals) should be justified by the manufacturer considering factors such as the stage of the product development and the complexity of the supply. For authorised products, a yearly frequency is recommended unless otherwise justified.

(Replaces PICS GMP Guide Part I Section 8.30)

## **PART B: SPECIFIC GUIDANCE ON SELECTED PRODUCT TYPES**

### **B1. ANIMAL SOURCED PRODUCTS**

This guidance applies to animal materials, which includes materials from establishments such as abattoirs. Since the supply chains can be extensive and complex, controls based on QRM principles need to be applied, see also requirements of appropriate pharmacopoeial monographs, including the need for specific tests at defined stages. Documentation to demonstrate the supply chain traceability<sup>5</sup> and clear roles of participants in the supply chain, typically including a sufficiently detailed and current process map, should be in place.

- B 1.1 Monitoring programmes should be in place for animal disease that is of concern to human health. Organisations should take into account reports from trustworthy sources on national disease prevalence when compiling their assessment of risk and mitigation factors. Such organisations include the World Organisation for Animal Health (OIE, Office International des Epizooties). This should be supplemented by information on health monitoring and control programme(s) at national and local levels, the latter to include the sources (e.g. farm or feedlot) from which the animals are drawn and the control measures in place during transport to the abattoirs.
- B 1.2 Control measures for starting and raw materials at establishments such as abattoirs should include appropriate elements of a Quality Management System to assure a satisfactory level of operator training, materials traceability, control and consistency. These measures may be drawn from sources outside PIC/S GMP but should be shown to provide equivalent levels of control. Xenogeneic starting material should comply with other national laws.
- B 1.3 Control measures for starting or raw materials should be in place, which prevent interventions, which may affect the quality of materials, or which at least provides evidence of such activities, during their progression through the manufacturing and supply chain. This includes the movement of material between sites of initial collection, partial and final purification(s), storage sites, hubs, consolidators and brokers. Details of such arrangements should be recorded within the traceability system and any breaches recorded, investigated and actions taken.
- B 1.4 Regular audits of the starting or raw material supplier should be undertaken which verify compliance with controls for materials at the different stages of manufacture. Issues must be investigated to a depth appropriate to their significance, for which full documentation should be available. Systems should also be in place to ensure that effective corrective and preventive actions are taken.
- B 1.5 Cells, tissues and organs intended for the manufacture of xenogeneic cell based medicinal products should be obtained only from animals that have been bred in captivity (barrier facility) specifically for this purpose and under no circumstances should cells, tissues and organs from wild animals or from abattoirs be used. Tissues of founder animals similarly should not be used. The health status of the animals should be monitored and documented.

---

<sup>5</sup> See PIC/S GMP Chapter 5



## **B2. GENE THERAPY MEDICINAL PRODUCTS (GTMPs)**

There are several types of gene therapy products. Synthetic GTMPs are within the scope of the guidance in this section. For cell-based gene therapy products, some aspects of the guidance in Section B3 may also be applicable.

B2.1 The manufacture and testing of GTMPs raises specific issues regarding the safety and quality of the final product and safety issues for recipients and staff. A risk based approach for operator, environment and patient safety and the implementation of controls based on the biological hazard class should be applied. National requirements and, if applicable, international safety measures should be applied.

B2.2 A description of the production of viral and non-viral vectors, nucleic acids (e.g. plasmids, linear DNA, mRNA, siRNA) and genetically modified cells should be available in sufficient detail to ensure the traceability of the products from the starting material (plasmids, gene of interest and regulatory sequences, cell banks, and viral or non-viral vector stock) to the finished product.

B2.3 The following considerations apply to the ex-vivo gene transfer to recipient cells:

- (a) Traceability requirements must be maintained. (refer to Section 4.3 to 4.8)
- (b) There should be a clear batch definition, from cell source to final product container(s). (refer Section 4.2)
- (c) For products that utilise non-biological means to deliver the gene, their physico-chemical properties should be documented and tested.
- (d) Although the vector used for the manipulation of the cell will not be part of the final product, all early processes (e.g. design to construction to manufacturing of the plasmid, as well as establishment of cell banks) in the manufacture of viral vectors are considered critical and their quality needs to be under control. In the case that due to national requirements the manufacture of viral vectors are not required under full GMP sufficient quality standards (“principles of GMP”) should be applied in their manufacture.

### **Manufacture of Viral Vectors and Plasmids under “principles of GMP”**

B2.4 Annex 2A and elements of Part II of the PIC/S GMP Guide can be considered for the manufacturing of viral vectors and plasmids where appropriate (refer to the examples in light grey in Table 1).

Manufacturers of viral vectors and plasmids should have a quality management system in place that allows them to apply sections of the guideline most relevant to ensure the quality of the starting materials having regard to the relevant risks for the quality, safety and efficacy of the finished product.

B2.5 The ATMP manufacturer is responsible for appropriate quality of the viral vectors and plasmids used as starting materials. Special attention should be given to requirements described in section 5.23 to 5.28 of this guideline.

- (a) The ATMP manufacturer should follow national requirements and apply QRM considering the risk presented by the vector to the safety and quality of the ATMP to justify which sections of Annex 2A and elements of Part II of the PIC/S GMP Guide are applicable for manufacture and testing of viral vectors and plasmids. A defined and controlled manufacturing process should be implemented as a result.
- (b) Sufficient quality standards should be applied for the manufacture of plasmids used for the establishment of vectors or early stages of mRNA GTMPs (refer to Table 1). The design through to construction of the nucleic acid (plasmid) preparation by molecular biological and in silico methods is considered under the scope of research and development and therefore not part of the respective Annex.
- (c) Relevant provisions in Annex 1 are also applicable. The manufacturer should justify the applicability extent using QRM. In general, products that can be sterile filtered should follow the relevant sections in the Annex 1, otherwise aseptic manufacturing provisions should be followed.

B2.6 If the manufacturing of the vectors is outsourced, the ATMP manufacturer should assess the risk presented by the vector to the quality and safety of the ATMP and thereby select a suitable vector supplier that is able to comply with the GMP standards required by national legislation.

The appropriate sections of Annex 2A and elements of Part II of the PIC/S GMP Guide relevant for the specific product should be determined in the agreement between the ATMP manufacturer and the vector manufacturer and cover relevant aspects (e.g. quality management, documentation, raw materials, cell banks, production, testing and control, storage, and other aspects of handling and distribution, as appropriate). In addition, the vector manufacturer should be part of the ATMP manufacturer's vendor qualification programme. The level of supervision and further testing by the ATMP manufacturer should be proportionate to the risks posed by the individual materials.

### **B3 SOMATIC HUMAN AND XENOGENEIC CELL THERAPY PRODUCTS AND TISSUE ENGINEERED PRODUCTS AND COMBINED ATMPs**

For genetically modified cell-based products that are not classified as GTMPs, some aspects of guidance in Section B2 may be applicable.

- B3.1 In the manufacture of such products involving human or xenogeneic cells special attention should be given to traceability requirements (refer to Section 4.3 to 4.8) and definition of a batch (refer to Section 4.2).
- B3.2 Authorised sources of cellular products, bio-molecules, bio-materials, scaffolds, matrices, and other substances that are licensed medicinal products or medical devices should be used where available.
- B3.3 During the life cycle of the product where devices, including custom-made devices, are incorporated as part of the product, an appropriate Quality Agreement should be made between manufacturer and device suppliers to assure consistent quality of the device.

## COMMON GLOSSARY TO ANNEX 2A AND 2B

The Glossary in the main GMP Guide applies also to Annex 2A & B. Entries in this common glossary are only included where the terms are used in Annex 2A & B and require further explanation. Definitions, which already exist, have been deemed appropriate.

### **ATMP Active substance**

The active substance of a product is defined in the relevant CTA or MA authorisation dossier. The ATMP active substance is regarded equivalent to an API.

### **Adjuvant**

A chemical or biological substance that enhances the immune response against an antigen.

### **Advanced Therapy Medicinal Products (ATMP)**

ATMP means any of the following medicinal products for human use:

(a) Gene therapy medicinal product (GTMP):

‘GTMP’ means a biological medicinal product, which has the following characteristics:

- i. It contains an active substance, which contains or consists of a recombinant nucleic acid used in or administered to human beings with a view to regulating, repairing, replacing, adding or deleting a genetic sequence;
- ii. Its therapeutic, prophylactic or diagnostic effect relates directly to the recombinant nucleic acid sequence it contains, or to the product of genetic expression of this sequence.

Normally GTMPs shall not include vaccines against infectious diseases which would be regulated as per Annex 2B. However, the Competent Authority can make a determination that should follow Annex 2A when this is beneficial and appropriate (e.g. mRNA vaccines that are manufactured using the same platform).

(b) Somatic cell therapy medicinal product:

‘Somatic cell therapy medicinal product’ means a biological medicinal product, which has the following characteristics:

- i. contains or consists of cells or tissues that have been subject to substantial manipulation so that biological characteristics, physiological functions or structural properties relevant for the intended clinical use have been altered, or of cells or tissues that are not intended to be used for the same essential function(s) in the recipient and the donor;
- ii. is presented as having properties for, or is used in or administered to human beings with a view to treating, preventing or diagnosing a

disease through the pharmacological, immunological or metabolic action of its cells or tissues.

(c) Tissue engineered product:

‘Tissue engineered product’ means a product that:

- i. contains or consists of engineered cells or tissues, and
- ii. is presented as having properties for, or is used in or administered to human beings with a view to regenerating, repairing or replacing a human tissue.

A tissue-engineered product may contain cells or tissues of human or animal origin, or both. The cells or tissues may be viable or non-viable. It may also contain additional substances, such as cellular products, bio-molecules, biomaterials, chemical substances, scaffolds or matrices. Products containing or consisting exclusively of non-viable human or animal cells and/or tissues, which do not contain any viable cells or tissues and which do not act principally by pharmacological, immunological or metabolic action, shall be excluded from this definition.

Cells or tissues shall be considered ‘engineered’ if they fulfil at least one of the following conditions:

- i. the cells or tissues have been subject to substantial manipulation, so that biological characteristics, physiological functions or structural properties relevant for the intended regeneration, repair or replacement are achieved; or
- ii. the cells or tissues are not intended to be used for the same essential function or functions in the recipient as in the donor.

(d) Combined ATMPs:

‘Combined ATMP’ means an advanced therapy medicinal product that fulfils the following conditions:

- i. it must incorporate, as an integral part of the product, one or more medical devices or one or more active implantable medical devices, and
- ii. its cellular or tissue part must contain viable cells or tissues or its cellular or tissue part containing non-viable cells or tissues must be liable to act upon the human body with action that can be considered as primary to that of the devices referred to.

(e) A product that is classified or determined to be an ATMP by the PIC/S participating authority in its own jurisdiction according to national law.

**Allergoids**

Allergens, which are chemically modified to reduce IgE reactivity.

**Antibody**

Proteins produced by the B-lymphocytes that bind to specific antigens. Antibodies may be divided into 2 main types based on key differences in their method of manufacture.

**Monoclonal antibodies (MAb)**

Homogenous antibody population obtained from a single clone of lymphocytes or by recombinant technology and which bind to a single epitope.

**Polyclonal antibodies**

Derived from a range of lymphocyte clones, produced in human and animals in response to the epitopes on most 'non-self' molecules

**Antigens**

Substances (e.g. toxins, foreign proteins, bacteria, tissue cells) capable of inducing specific immune responses.

**Area**

A specific set of rooms within a building associated with the manufacturing of any one product or multiple products that has a common air-handling unit.

**Authorised Person**

Person recognised by the authority as having the necessary basic scientific and technical background and experience.

Note: For expanded clarity beyond the definition in the PIC/S GMP Guide, the Authorised Person performs certification of batches in line with MA/CTA. After certification, the batches of medicinal products can be released for sale or supply to the market. The Authorised Person has the overall responsibility for release of the products.

**Bioburden**

The level and type (i.e. objectionable or not) of micro-organism present in raw materials, media, biological substances, intermediates or products. Regarded as contamination when the level and/or type exceed specifications.

**Biological medicinal product**

A biological medicinal product is a product, of which the active substance is a biological substance. A biological substance is a substance that is produced by or extracted from a biological source and that needs for its characterisation and the determination of its quality a combination of physico-chemical-biological testing, together with the production process and its control.

**Biosafety level (BSL)**

The containment conditions required to safely handle organisms of different hazards ranging from BSL1 (lowest risk, unlikely to cause human disease) to BSL4 (highest risk, cause severe disease, likely to spread and no effective prophylaxis or treatment available).

**Campaign manufacture**

The manufacture of a series of batches of the same product in sequence in a given period of time followed by strict adherence to accepted control measures before transfer to another product. The products are not run at the same time but may be run on the same equipment.

**Closed system**

Where an active substance or product is not exposed to the immediate room environment during manufacture.

**Contained use**

An operation, in which genetically modified organisms are cultured, stored, used, transported, destroyed or disposed of and for which barriers (physical / chemical / biological) are used to limit their contact with the general population and the environment.

**Critical Process Parameter (CPP)**

A process parameter whose variability has an impact on a CQA and therefore should be monitored or controlled to ensure the process produces the desired quality. (ICH Q8R2)

**Critical Quality Attribute (CQA)**

A physical, chemical, biological, or microbiological property or characteristic that should be within an appropriate limit, range, or distribution to ensure the desired product quality. (ICH Q8R2)

**Ex-vivo**

Where procedures are conducted on tissues or cells outside the living body and returned to the living body.

**Feeder cells**

Cells used in co-culture to maintain pluripotent stem cells. For human embryonic stem cell culture, typical feeder layers include mouse embryonic fibroblasts (MEFs) or human embryonic fibroblasts that have been treated to prevent them from dividing.

**Fermenter**

In case of (mammalian) cell lines, the term fermenter should be understood as bioreactor.

**Gene**

A sequence of DNA that codes for one (or more) protein(s).

**Gene transfer**

A process to transfer a gene in cells, involving an expression system contained in a delivery system known as a vector, which can be of viral, as well as non-viral origin. After gene transfer, genetically modified cells are also termed *transduced cells*.

**Genetically modified organism (GMO)**

An organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination. For the purpose of this annex, GMO is intended to cover mutations that are not occurring because of a natural event but are generated by human intervention.

**Hapten**

A low molecular weight molecule that is not in itself antigenic unless conjugated to a 'carrier' molecule.

**Hybridoma**

An immortalised cell line that secrete desired (monoclonal) antibodies and are typically derived by fusing B-lymphocytes with tumour cells.

**In-vivo**

Procedures conducted in living organisms.

**Look-back**

Documented procedure to trace ATMPs active substances or products, which may be adversely affected by the use or incorporation of animal or human materials either when such materials fail release tests due to the presence of contaminating agent or when conditions of concern become apparent in the source animal or human.

**Master cell bank (MCB)**

An aliquot of a single pool of cells, which generally has been prepared from the selected cell clone under defined conditions, dispensed into multiple containers and stored under defined conditions. The MCB is used to derive all working cell banks.

**Master transgenic bank**

As above but for transgenic plants or animals.

**Master virus seed (MVS)**

As above, but in relation to viruses.

**Material directly in contact with the ATMP during manufacture and storage**

Non exhaustive example list: Processing containers (e.g. fermenters, cell culture flasks and plates, blood bag systems, single use equipment used in automated manufacturing platforms, beads for separation techniques, chromatographic column material), cryo-containers for storage and primary packaging material.

**Monosepsis (axenic)**

A single organism in culture, which is not contaminated with any other.

**Multi-product facility**

A facility that manufactures, concurrently or in campaign mode, a range of different ATMPs active substances and products and within which equipment train either may or may not be dedicated to specific substances or products.

**Plasmid**

A plasmid is a piece of DNA usually present in a bacterial cell as a circular entity separated from the cell chromosome; it can be modified by molecular biology techniques, purified out of the bacterial cell and used to transfer its DNA to another cell.

**Primary cell lot**

A pool of primary cells minimally expanded to attain a sufficient number for a limited number of applications.

**Principles of GMP:**

The Annex 2A in conjunction with PIC/S GMP guidelines and annexes describes the manufacture of ATMP active substances and ATMP drug products. However, aspects of these guidelines are also relevant for early stages in the ATMP manufacture (e.g. manufacture of viral vectors, plasmids) where full GMP is not required under national legislation. As a result, the ATMP manufacturer should make sure that all relevant GMP aspects for the manufacturing of those materials are implemented that ensure process control and consistency, investigation of anomalies and control of change.

**Processing aids**

Substance used in the manufacture of the active substance and medicinal product, which may be present in the finished product e.g. anti-foaming agents, puffer and media additives (salts, pH indicators), enzymes not considered under raw materials

**Quality Target Product Profile (QTPP)**

A prospective summary of the quality characteristics of a drug product that ideally will be achieved to ensure the desired quality, taking into account safety and efficacy of the drug product. (ICHQ8R2)

**Raw materials**

All materials that come in direct contact with the product during the manufacturing process but are not necessarily part of the final formulation (e.g. cryoprotectants, feeder cells, reagents, culture media, buffers, serum, enzymes, cytokines, and growth factors).

**Responsible Person (RP) for blood or tissue establishment**

This term is equivalent to the EU term “Responsible Person”. The RP is responsible for the release of the starting material to the ATMP manufacturer. **Blood or tissue establishment:** this term is equivalent to the EU term and for the purpose of this annex is the facility that is authorised according to national law to perform processing (minimal manipulation) of the starting material of human origin.

**Scaffold**

A support, delivery vehicle or matrix that may provide structure for or facilitate the migration, binding or transport of cells and/or bioactive molecules.

**Somatic cells**

Cells, other than reproductive (germ line) cells, which make up the body of a human or animal. These cells may be autologous (from the patient), allogeneic (from another human being) or xenogeneic (from animals) somatic living cells, that have been manipulated or altered ex vivo, to be administered in humans to obtain a therapeutic, diagnostic or preventive effect.

**Specified pathogen free (SPF)**

Animal materials (e.g. chickens, embryos or cell cultures) used for the production or quality control of biological medicinal products derived from groups (e.g. flocks or herds) of animals free from specified pathogens (SPF). Such flocks or herds are defined as animals sharing a common environment and having their own caretakers who have no contact with non-SPF groups.

**Transgenic**

An organism that contains a foreign gene in its normal genetic component for the expression of biological pharmaceutical materials.

**Vector**

An agent of transmission, which transmits genetic information from one cell or organism to another, e.g. plasmids, liposomes, viruses.

**Viral vector**

A vector derived from a virus and modified by means of molecular biology techniques in a way as to retain some, but not all, the parental virus genes; if the genes responsible for virus replication capacity are deleted, the vector is made replication-incompetent.

**Viral Vector replication incompetent / devoid**

No ability of the vector to replicate.



**Viral Vector replication limited / defective / conditional replication**

A constrained ability to replicate where the intent is for the vector may be to target a particular tissue or target cell type with a planned integration required for clinical efficacy of the gene therapy.

**Working cell bank (WCB)**

A homogeneous pool of cells preferably derived from a MCB, which are distributed uniformly into a number of containers, stored in such a way to ensure stability and intended for use in production.

**Working transgenic bank (WTB)**

**As above but for transgenic plants or animals.**

**Working virus seed (WVS)**

As above but in relation to viruses.

**Zoonosis (zoonotic)**

Animal diseases that can be transmitted to humans.

---

## ANNEX 2B

# MANUFACTURE OF BIOLOGICAL MEDICINAL SUBSTANCES AND PRODUCTS FOR HUMAN USE

## SCOPE

The methods employed in the manufacture of biological active substances and biological medicinal products for human use ('biological active substances and medicinal products') are a critical factor in shaping the appropriate regulatory control. Biological active substances and medicinal products can be defined therefore largely by reference to their method of manufacture. This annex provides guidance on the full range of active substances and medicinal products defined as biological with the exception of Advanced Therapy Medicinal Products ("ATMPs"). The ATMPs are not covered by the present guideline. Manufacturers of ATMPs should refer to PIC/S Annex 2A Manufacture of Advanced Therapy Medicinal Products for Human Use.

This annex is divided into two main parts:

- a) Part A contains supplementary guidance on the manufacture of biological active substances and medicinal products, from control over seed lots and cell banks through to finishing activities and testing.
- b) Part B contains further guidance on selected types of biological active substances and medicinal products.

This annex, along with several other annexes of the PIC/S Guide to GMP, provides guidance which supplements that in Part I and in Part II of the Guide. There are two aspects to the scope of this annex:

- a) Stage of manufacture - for biological active substances to the point immediately prior to their being rendered sterile, the primary guidance source is Part II. Guidance for the subsequent manufacturing steps of biological products are covered in Part I.
- b) Type of product - this annex provides guidance on the full range of medicinal products defined as biological with the exception of ATMPs.

These two aspects are shown in Table 1; it should be noted that this table is illustrative only and is not meant to describe the precise scope. It should also be understood that in line with the corresponding table in Part II of the Guide, the level of GMP increases in detail from early to later steps in the manufacture of biological active substances but GMP principles should always be adhered to. The inclusion of some early steps of manufacture within the scope of this Annex does not imply that those steps will be routinely subject to inspection by the authorities.

Antibiotics are not defined as biological medicinal products, however where biological stages of manufacture occur, guidance in this Annex may be used.

Guidance for medicinal products derived from fractionated human blood or plasma is covered in Annex 14 and for non-transgenic plant products in Annex 7.

In certain cases, other legislation may be applicable to the starting materials for biologicals. For example,

- (a) Tissue and cells used as starting materials for medicinal products, donation, procurement, testing, processing, preservation, storage and distribution of human tissues and cells of tissue and cells may be covered by national legislation. Such tissues and cells may provide the active substances for some biological medicinal product within the scope of this annex at which point GMP and other medicinal product legislation requirements apply.
- (b) Blood or blood components used as starting materials for medicinal products, national legislation may provide the technical requirements for the selection of donors, collection, testing, processing, storage, and distribution of human blood and blood components<sup>1</sup>.

Additionally, the manufacture and control of genetically modified organisms needs to comply with local and national requirements. Appropriate containment should be established and maintained in facilities where any genetically modified micro-organism is handled<sup>2</sup>. Advice should be obtained according to national legislation in order to establish and maintain the appropriate Biological Safety Level. There should be no conflicts with GMP requirements.

**Table 1. Illustrative guide to manufacturing activities within the scope of Annex 2B**

Type and source of material	Example product	Application of this guide to manufacturing steps shown in grey			
1. Animal or plant sources: non-transgenic	Heparins, insulin, enzymes, proteins, allergen extract, immunosera	Collection of plant, organ, animal material or fluid <sup>3</sup>	Cutting, mixing, and / or initial processing	Isolation and purification	Formulation, filling
2. Virus or bacteria / fermentation / cell culture	Viral or bacterial vaccines; enzymes, proteins	Establishment & maintenance of MCB <sup>4</sup> , WCB, MVS, WVS	Cell culture and/or fermentation	Inactivation when applicable, isolation and purification	Formulation, filling
3. Biotechnology fermentation/ cell culture	Recombinant products, MAb, allergens, vaccines	Establishment & maintenance of MCB and WCB, MSL, WSL	Cell culture and /or fermentation	Isolation, purification, modification	Formulation, filling

<sup>1</sup> In the EEA, this is Directive 2002/98/EC and its Commission Directives.

<sup>2</sup> In the EEA, this is Directive 2009/41/EC on contained use of genetically modified micro-organisms.

<sup>3</sup> See section B1 for the extent to which GMP principles apply.

<sup>4</sup> See section on 'Seed lot and cell bank system' for the extent to which GMP applies.

4. Animal sources: transgenic	Recombinant proteins	Master and working transgenic bank	Collection, cutting, mixing, and/or initial processing	Isolation, purification and modification	Formulation, filling
5. Plant sources: transgenic	Recombinant proteins, vaccines, allergens	Master and working transgenic bank	Growing, harvesting <sup>5</sup>	Initial extraction, isolation, purification, modification	Formulation, filling
6. Human sources	Urine derived enzymes, hormones	Collection of fluid <sup>6</sup>	Mixing, and/or initial processing	Isolation and purification	Formulation, filling
7. Human sources	Products from cells and tissues, not classified as ATMPs	Donation, procurement and testing of starting tissue / cells <sup>7</sup>	Initial processing, isolation and purification.	Cell isolation, culture, purification, combination with non-cellular components	Formulation, combination, filling



See Glossary for explanation of acronyms.

## PRINCIPLE

The manufacture of biological active substances and medicinal products involves certain specific considerations arising from the nature of the products and the processes. The ways in which biological medicinal products are manufactured, controlled and administered make some particular precautions necessary.

Unlike conventional medicinal products, which are manufactured using chemical and physical techniques capable of a high degree of consistency, the manufacture of biological active substances and medicinal products involves biological processes and materials, such as cultivation of cells or extraction from living organisms. These biological processes may display inherent variability, so that the range and nature of by-products may be variable. As a result, quality risk management (QRM) principles are particularly important for this class of materials and should be used to develop the control strategy across all stages of manufacture so as to minimise variability and to reduce the opportunity for contamination and cross-contamination.

Since materials and processing conditions used in cultivation processes are designed to provide conditions for the growth of specific cells and microorganisms, this provides extraneous microbial contaminants the opportunity

<sup>5</sup> In the EEA: HMPC guideline on Good Agricultural and Collection Practice - EMEA/HMPC/246816/2005 may be applied to growing, harvesting and initial processing in open fields.

<sup>6</sup> For principles of GMP apply, see explanatory text in 'Scope'.

<sup>7</sup> In the EEA, human tissues and cells must comply with Directive 2004/23/EC and implementing Directives at these stages.

to grow. In addition, some products may be limited in their ability to withstand a wide range of purification techniques particularly those designed to inactivate or remove adventitious viral contaminants. The design of the processes, equipment, facilities, utilities, the conditions of preparation and addition of buffers and reagents, sampling and training of the operators are key considerations to minimise such contamination events.

Specifications related to products (such as those in Pharmacopoeial monographs, Clinical Trial Authorisation (CTA), and Marketing Authorisation (MA)) will dictate whether and to what stage substances and materials can have a defined level of bioburden or need to be sterile. Similarly, manufacturing must be consistent with other specifications set out in the CTA or MA (e.g. number of generations (doublings, passages) between the seed lot or cell bank).

For biological materials that cannot be sterilized (e.g. by filtration), processing must be conducted aseptically to minimise the introduction of contaminants. Where they exist, other guidance documents should be consulted on the validation of specific manufacturing methods, e.g. virus removal or inactivation. The application of appropriate environmental controls and monitoring and, wherever feasible, in-situ cleaning and sterilisation systems together with the use of closed systems can significantly reduce the risk of accidental contamination and cross-contamination.

Control usually involves biological analytical techniques, which typically have a greater variability than physico-chemical determinations. A robust manufacturing process is therefore crucial and in-process controls take on a particular importance in the manufacture of biological active substances and medicinal products.

Biological medicinal products which incorporate human tissues or cells must comply with national requirements for the coding, processing, preservation, storage and distribution of human tissues and cells.<sup>8</sup> Collection and testing of this material must be done in accordance with an appropriate quality system and in accordance with applicable national requirements<sup>9</sup>. Furthermore, national requirements<sup>10</sup> on traceability apply from the donor (while maintaining donor confidentiality) through stages applicable at the Tissue Establishment and then continued under medicines legislation through to the institution where the product is used.

Biological active substances and medicinal products must comply with the applicable national guidance on minimising the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products.

---

<sup>8</sup> In the EEA, these are Directive 2004/23/EC and Directive 2006/17/EC.

<sup>9</sup> In the EEA, this is the Commission Directive 2006/86/EC.

<sup>10</sup> In the EEA, this is Directive 2006/86/EC.

## **PART A: GENERAL GUIDANCE**

### **PERSONNEL**

1. Personnel (including those concerned with cleaning, maintenance or quality control) employed in areas where biological active substances and products are manufactured and tested should receive training, and periodic retraining, specific to the products manufactured and to their work, including any specific security measures to protect product, personnel and the environment.
2. The health status of personnel should be taken into consideration for product safety. Where necessary, personnel engaged in production, maintenance, testing and animal care (and inspections) should be vaccinated with appropriate specific vaccines and have regular health checks.
3. Any changes in the health status of personnel, which could adversely affect the quality of the product, should preclude work in the production area and appropriate records kept. Production of BCG vaccine and tuberculin products should be restricted to staff who are carefully monitored by regular checks of immunological status or chest X-ray. Health monitoring of staff should be commensurate with the risk, medical advice should be sought for personnel involved with hazardous organisms.
4. Where required to minimise the opportunity for cross-contamination, restrictions on the movement of all personnel (including quality control (QC), maintenance and cleaning staff) should be controlled on the basis of QRM principles. In general, personnel should not pass from areas where exposure to live micro-organisms, genetically modified organisms, toxins or animals to areas where other products, inactivated products or different organisms are handled. If such passage is unavoidable, the contamination control measures should be based on QRM principles.

### **PREMISES AND EQUIPMENT**

5. As part of the control strategy, the degree of environmental control of particulate and microbial contamination of the production premises should be adapted to the active substance, intermediate or finished product and the production step, bearing in mind the potential level of contamination of the starting materials and the risks to the product. The environmental monitoring programme should be supplemented by the inclusion of methods to detect the presence of specific microorganisms (i.e. host organism, yeasts, moulds, anaerobes, etc) where indicated by the QRM process.
6. Manufacturing and storage facilities, processes and environmental classifications should be designed to prevent the extraneous contamination of products. Prevention of contamination is more appropriate than detection and removal, although contamination is likely to become evident during processes such as fermentation and cell culture. Where processes are not closed and there is therefore exposure of the product to the immediate room environment (e.g. during additions of supplements, media, buffers, gasses,) control measures should be put in place, including engineering and environmental controls on the basis of

QRM principles. These QRM principles should take into account the principles and guidance from the appropriate sections of Annex 1<sup>11</sup> when selecting environmental classification cascades and associated controls.

7. Dedicated production areas should be used for the handling of live cells. Dedicated production area should be used for the manufacture of pathogenic organisms (i.e. Biosafety level 3 or 4).
8. Manufacture in a multi-product facility may be acceptable where the following, or equivalent (as appropriate to the product types involved) considerations and measures are part of an effective control strategy to prevent cross-contamination:
  - (a) Knowledge of key characteristics of all cells, organisms and any adventitious agents (e.g. pathogenicity, detectability, persistence, susceptibility to inactivation) within the same facility.
  - (b) Where production is characterised by multiple small batches from different starting materials, factors such as the health status of donors and the risk of total loss of product should be taken into account when considering the acceptance of concurrent working during development of the control strategy.
  - (c) Live organisms and spores are prevented from entering non-related areas or equipment by addressing all potential routes of cross-contamination and utilizing single use components and engineering measures such as closed systems.
  - (d) Control measures to remove the organisms and spores before the subsequent manufacture of other products, these control measures should also take the heating, ventilation and air conditioning (HVAC) system into account. Cleaning and decontamination for the organisms and spores should be validated.
  - (e) Environmental monitoring, specific for the micro-organism being manufactured, where the micro-organisms are capable of persistence in the manufacturing environment and where methods are available, is conducted in adjacent areas during manufacture and after completion of cleaning and decontamination. Attention should also be given to risks arising with use of certain monitoring equipment (e.g. airborne particle monitoring) in areas handling live and/or spore forming organisms.
  - (f) Products, equipment, ancillary equipment (e.g. for calibration and validation) and disposable items are only moved within and removed from such areas in a manner that prevents contamination of other areas, other products and different product stages (e.g. prevent contamination of inactivated or toxoided products with non-inactivated products).
  - (g) Campaign based manufacturing.

---

<sup>11</sup> Although the title of Annex 1 refers to the manufacture of sterile medicinal products it is not the intention to force the manufacture of sterile product at a stage when a low bioburden is appropriate and authorised. Its use is because it is the PIC/S GMP source of guidance on all of the classified manufacturing areas including the lower grades D and C.

9. For finishing (secondary) operations<sup>12</sup>, the need for dedicated facilities will depend on consideration of the above together with additional considerations such as the specific needs of the biological medicinal product and on the characteristics of other products, including any non-biological products, in the same facility. Other control measures for finishing operations may include the need for specific addition sequences, mixing speeds, time and temperature controls, limits on exposure to light and containment and cleaning procedures in the event of spillages.
10. The measures and procedures necessary for containment (i.e. for environment and operator safety) should not conflict with those for product quality.
11. Air handling units should be designed, constructed and maintained to minimise the risk of cross-contamination between different manufacturing areas and may need to be specific for an area. Consideration, based on QRM principles, should be given to the use of single pass air systems.
12. Positive pressure areas should be used to process sterile products but negative pressure in specific areas at the point of exposure of pathogens is acceptable for containment reasons. Where negative pressure areas or safety cabinets are used for aseptic processing of materials with particular risks (e.g. pathogens), they should be surrounded by a positive pressure clean zone of appropriate grade. These pressure cascades should be clearly defined and continuously monitored with appropriate alarm settings.
13. Equipment used during handling of live organisms and cells, including those for sampling, should be designed to prevent any contamination during processing.
14. Primary containment<sup>13</sup> should be designed and periodically tested to ensure the prevention of escape of biological agents into the immediate working environment.
15. The use of 'clean in place' and 'steam in place' ('sterilisation in place') systems should be used where possible. Valves on fermentation vessels should be completely steam sterilisable.
16. Air vent filters should be hydrophobic and validated for their scheduled life span with integrity testing at appropriate intervals based on appropriate QRM principles.
17. Drainage systems must be designed so that effluents can be effectively neutralised or decontaminated to minimise the risk of cross-contamination. Local regulation must be complied with to minimise the risk of contamination of the external environment according to the risk associated with the biohazardous nature of waste materials.
18. Due to the variability of biological products or manufacturing processes, relevant/critical raw materials (such as culture media and buffers) have to be measured or weighed during the production process. In these cases, small stocks

---

<sup>12</sup> Formulation, filling and packaging

<sup>13</sup> See main GMP Glossary on 'Containment'.



of these raw materials may be kept in the production area for a specified duration based on defined criteria such as for the duration of manufacture of the batch or of the campaign.

## ANIMALS

19. A wide range of animal species are used in the manufacture of a number of biological medicinal products. These can be divided into 2 broad types of sources:

- (a) Live groups, herds, flocks: examples include polio vaccine (monkeys), immunosera to snake venoms and tetanus (horses, sheep and goats), allergens (cats), rabies vaccine (rabbits, mice and hamsters), transgenic products (goats, cattle).
- (b) Animal materials derived post-mortem and from establishments such as abattoirs: examples include, abattoir sources for enzymes, anticoagulants and hormones (sheep and pigs).

In addition, animals may also be used in quality control either in generic assays, e.g. pyrogenicity, or specific potency assays, e.g. pertussis vaccine (mice), pyrogenicity (rabbits), BCG vaccine (guinea-pigs).

20. In addition to compliance with TSE regulations, other adventitious agents that are of concern (zoonotic diseases, diseases of source animals) should be monitored by an ongoing health programme and recorded. Specialist advice should be obtained in establishing such programmes. Instances of ill-health occurring in the source/donor animals should be investigated with respect to their suitability and the suitability of in-contact animals for continued use (in manufacture, as sources of starting and raw materials, in quality control and safety testing), the decisions must be documented. A look-back procedure should be in place which informs the decision making process on the continued suitability of the biological active substance or medicinal product in which the animal sourced starting or raw materials have been used or incorporated. This decision-making process may include the re-testing of retained samples from previous collections from the same donor animal (where applicable) to establish the last negative donation. The withdrawal period of therapeutic agents used to treat source/donor animals must be documented and used to determine the removal of those animals from the programme for defined periods.

21. Particular care should be taken to prevent and monitor infections in the source / donor animals. Measures should include the sourcing, facilities, husbandry, biosecurity procedures, testing regimes, control of bedding and feed materials. This is of special relevance to specified pathogen free animals where pharmacopoeial monograph requirements must be met. Housing and health monitoring should be defined for other categories of animals (e.g. healthy flocks or herds).

22. For products manufactured from transgenic animals, traceability should be maintained in the creation of such animals from the source animals.

23. Note should be taken of national requirements on the protection of animals used for scientific purposes<sup>14</sup>. Housing for animals used in production and control of biological active substances and medicinal products should be separated from production and control areas.
24. For different animal species, key criteria should be defined, monitored, and recorded. These may include age, weight and health status of the animals.
25. Animals, biological agents, and tests carried out should be the subject of an identification system to prevent any risk of confusion and to control all identified hazards.

## DOCUMENTATION

26. Starting and raw materials may need additional documentation on the source, origin, distribution chain, method of manufacture, and controls applied, to assure an appropriate level of control including their microbiological quality.
27. Some product types may require specific definition of what materials constitutes a batch, particularly cells.
28. Where human cell or tissue donors are used, full traceability is required from starting and raw materials, including all substances coming into contact with the cells or tissues through to confirmation of the receipt of the products at the point of use whilst maintaining the privacy of individuals and confidentiality of health related information<sup>15</sup>. Traceability records must be retained for 30 years after the expiry date of the medicinal product. Particular care should be taken to maintain the traceability of products for special use cases, such as donor-matched cells. National requirements<sup>16</sup> in regards to traceability requirements and notification of serious adverse reactions and events apply to blood components when they are used as starting or raw materials in the manufacturing process of medicinal products.

## PRODUCTION

29. Given the variability inherent in many biological active substances and medicinal products, steps to increase process robustness thereby reducing process variability and enhancing reproducibility at the different stages of the product lifecycle such as process design should be reassessed during Product Quality Reviews.
30. Since cultivation conditions, media and reagents are designed to promote the growth of cells or microbial organisms, typically in an axenic state, particular attention should be paid in the control strategy to ensure there are robust steps that prevent or minimise the occurrence of unwanted bioburden and associated metabolites and endotoxins. For medicinal products from cells and tissues where

---

<sup>14</sup> In the EEA, this is Directive 2010/63/EC.

<sup>15</sup> In the EEA, see Article 15 of Regulation 1394/ 2007.

<sup>16</sup> In the EEA, these are Directives 2002/98/EC and 2005/61/EC.

production batches are frequently small the risk of cross-contamination between cell preparations from different donors with various health status should be controlled under defined procedures and requirements.

## **STARTING AND RAW MATERIALS**

31. The source, origin and suitability of biological starting and raw materials (e.g. cryoprotectants, feeder cells, reagents, culture media, buffers, serum, enzymes, cytokines, growth factors) should be clearly defined. Where the necessary tests take a long time, it may be permissible to process starting materials before the results of the tests are available, the risk of using a potentially failed material and its potential impact on other batches should be clearly understood and assessed under the principles of QRM. In such cases, release of a finished product is conditional on satisfactory results of these tests. The identification of all starting materials should be in compliance with the requirements appropriate to its stage of manufacture. For biological medicinal products further guidance can be found in Part I and Annex 8 and for biological active substances in Part II.
32. The risk of contamination of starting and raw materials during their passage along the supply chain must be assessed, with particular emphasis on TSE. Materials that come into direct contact with manufacturing equipment or the product (such as media used in media fill experiments and lubricants that may contact the product) must also be taken into account.
33. Given that the risks from the introduction of contamination and the consequences to the finished product is the same irrespective of the stage of manufacture, establishment of a control strategy to protect the product and the preparation of solutions, buffers and other additions should be based on the principles and guidance contained in the appropriate sections of Annex 1. The controls required for the quality of starting and raw materials and on the aseptic manufacturing process, assume greater importance particularly for products, in respect of which final sterilisation is not possible. Where a CTA or MA provides for an allowable type and level of bioburden, for example at active substance stage, the control strategy should address the means by which this is maintained within the specified limits.
34. Where sterilisation of starting and raw materials is required, it should be carried out where possible by heat. Where necessary, other appropriate methods may also be used for inactivation of biological materials (e.g. irradiation and filtration).
35. Reduction in bioburden associated with procurement of living tissues and cells may require the use of other measures such as antibiotics at early manufacturing stages. This should be avoided, but where it is necessary their use should be justified, they should be removed from the manufacturing process at the stage specified in the CTA or MA.

36. The donation, procurement and testing of human tissues and cells used as starting materials for biological medicinal products should be in accordance with national law requirements.<sup>17</sup> Traceability for human tissues and cells used as starting materials for biological medicinal products should be maintained from the donor to the batch of a finished medicinal product. Appropriate arrangements should be made between the manufacturer and the supplier of tissues and cells regarding the transfer of health donor information that may become available after the supply of the starting material and which may have an impact on the quality or safety of the medicinal product manufactured therefrom.
- (a) Their procurement, donation and testing is regulated in some countries<sup>18</sup>. Such supply sites must hold appropriate approvals from the national competent authority(ies) which should be verified as part of starting material supplier management.
  - (b) Where such human cells or tissues are imported, they must meet equivalent national standards of quality and safety<sup>19</sup>. The traceability and serious adverse reaction and serious adverse event notification requirements may be set out in national legislation<sup>20</sup>.
  - (c) There may be some instances where processing of cells and tissues used as starting materials for biological medicinal products will be conducted at tissue establishments<sup>21</sup>.
  - (d) Tissue and cells are released by the Responsible Person (RP) in the tissue establishment before shipment to the medicinal product manufacturer, after which normal medicinal product starting material controls apply. The test results of all tissues / cells supplied by the tissue establishment should be available to the manufacturer of the medicinal product. Such information must be used to make appropriate material segregation and storage decisions. In cases where manufacturing must be initiated prior to receiving test results from the tissue establishment, tissue and cells may be shipped to the medicinal product manufacturer provided controls are in place to prevent cross-contamination with tissue and cells that have been released by the RP in the tissue establishment.
  - (e) The transport of human tissues and cells to the manufacturing site must be controlled by a written agreement between the responsible parties. The manufacturing sites should have documentary evidence of adherence to the specified storage and transport conditions.
  - (f) Continuation of traceability requirements started at tissue establishments through to the recipient(s), and vice versa, including materials in contact with the cells or tissues, should be maintained.
  - (g) A technical agreement should be in place between the responsible parties (e.g. manufacturers, tissue establishment, Sponsors, MA Holder) which defines the tasks of each party, including the RP and Authorised Person.

---

<sup>17</sup> In the EEA, this is Directive 2004/23/EC or for blood-derived cells, compliance with Directive 2002/98 regarding donation, procurement and testing.

<sup>18</sup> In the EEA, this is Directive 2004/23/EC and its Commission directives.

<sup>19</sup> In the EEA, they must be equivalent to those laid down in Directive 2004/23/EC.

<sup>20</sup> In the EEA, this is Directive 2006/86/EC.

<sup>21</sup> In the EEA, such processing steps, are under the scope of 2004/23/EC and the Responsible Person (RP).

37. (...)<sup>22</sup>
38. Where human or animal cells are used in the manufacturing process as feeder cells, appropriate controls over the sourcing, testing, transport and storage should be in place<sup>23</sup>, including control of compliance with national requirements for human cells.

## SEED LOT AND CELL BANK SYSTEM

39. In order to prevent the unwanted drift of properties which might ensue from repeated subcultures or multiple generations, the production of biological medicinal substances and products obtained by microbial culture, cell culture or propagation in embryos and animals should be based on a system of master and working virus seed lots and/or cell banks.
40. The number of generations (doublings, passages) between the seed lot or cell bank, the biological active substance and the finished product should be consistent with specifications in the CTA or MA.
41. As part of product lifecycle management, establishment of seed lots and cell banks, including master and working generations, should be performed under appropriate GMP conditions. This should include an appropriately controlled environment to protect the seed lot and the cell bank and the personnel handling it. During the establishment of the seed lot and cell bank, no other living or infectious material (e.g. virus, cell lines or cell strains) should be handled simultaneously in the same area or by the same persons. For all stages prior to the establishment of the master seed or cell bank generation, principles of GMP may be applied. For all pre-master bank stages, documentation should be available to support traceability. All issues related to components used during the development with potential impact on product safety (e.g. reagents of biological origin) from initial sourcing and genetic development should be documented. For vaccines the requirements of pharmacopoeial monographs will apply<sup>24</sup>.
42. Following the establishment of master and working cell banks and master and working seed lots, quarantine and release procedures should be followed. This should include adequate characterization and testing for contaminants. Their on-going suitability for use should be further demonstrated by the consistency of the characteristics and quality of the successive batches of product. Evidence of the stability and recovery of the seeds and banks should be documented and records should be kept in a manner permitting trend evaluation.
43. Seed lots and cell banks should be stored and used in such a way as to minimize the risks of contamination (e.g. stored in the vapour phase of liquid nitrogen in sealed containers) or alteration. Ensuring compliance with measures for the storage of different seeds and/or cells in the same area or equipment should

---

<sup>22</sup> This line has been intentionally left blank to harmonise with the formatting structure of the EU GMP Guide.

<sup>23</sup> In the EEA, this includes compliance with Directive 2004/23 EC for human cells.

<sup>24</sup> In the EEA, this is Ph Eur monograph 2005;153 "Vaccines for human use".

prevent mix-up and take into account the infectious nature of the materials to prevent cross contamination.

44. (...)<sup>25</sup>
45. Storage containers should be sealed, clearly labelled and kept at an appropriate temperature. A stock inventory must be kept. The storage temperature should be recorded continuously and, where used, the liquid nitrogen level monitored. Deviation from set limits and corrective and preventive action taken should be recorded.
46. It is desirable to split stocks and to store the split stocks at different locations so as to minimize the risks of total loss. The controls at such locations should provide the assurances outlined in the preceding paragraphs.
47. The storage and handling conditions for stocks should be managed according to the same procedures and parameters. Once containers are removed from the seed lot / cell bank management system, the containers should not be returned to stock.

## **OPERATING PRINCIPLES**

48. Change management should, on a periodic basis, take into account the effects, including cumulative effects of changes (e.g. to the process) on the quality, safety and efficacy of the finished product.
49. Critical operational (process) parameters, or other input parameters which affect product quality, need to be identified, validated, documented and be shown to be maintained within requirements.
50. A control strategy for the entry of articles and materials into production areas should be based on QRM principles. For aseptic processes, heat stable articles and materials entering a clean area or clean/contained area should preferably do so through a double-ended autoclave or oven. Heat labile articles and materials should enter through an air lock with interlocked doors where they are subject to effective surface sanitisation procedures. Sterilisation of articles and materials elsewhere is acceptable provided that they are multiple wrappings, as appropriate to the number of stages of entry to the clean area, and enter through an airlock with the appropriate surface sanitisation precautions.
51. The growth promoting properties of culture media should be demonstrated to be suitable for its intended use. If possible, media should be sterilized in situ. In-line sterilizing filters for routine addition of gases, media, acids or alkalis, anti-foaming agents etc. to fermenters should be used where possible.
52. Addition of materials or cultures to fermenters and other vessels and sampling should be carried out under carefully controlled conditions to prevent

---

<sup>25</sup> This line has been intentionally left blank to harmonise with the formatting structure of the EU GMP Guide.

- contamination. Care should be taken to ensure that vessels are correctly connected when addition or sampling takes place.
53. Continuous monitoring of some production processes (e.g. fermentation) may be necessary; such data should form part of the batch record. Where continuous culture is used, special consideration should be given to the quality control requirements arising from this type of production method.
  54. Centrifugation and blending of products can lead to aerosol formation and containment of such activities to minimise cross-contamination is necessary.
  55. Accidental spillages, especially of live organisms, must be dealt with quickly and safely. Qualified decontamination measures should be available for each organism or groups of related organisms. Where different strains of single bacteria species or very similar viruses are involved, the decontamination process may be validated with one representative strain, unless there is reason to believe that they may vary significantly in their resistance to the agent(s) involved.
  56. If obviously contaminated, such as by spills or aerosols, or if a potential hazardous organism is involved, production and control materials, including paperwork, must be adequately disinfected, or the information transferred out by other means.
  57. In cases where a virus inactivation or removal process is performed during manufacture, measures should be taken to avoid the risk of recontamination of treated products by non-treated products.
  58. For products that are inactivated by the addition of a reagent (e.g. micro-organisms in the course of vaccine manufacture) the process should ensure the complete inactivation of live organism. In addition to the thorough mixing of culture and inactivant, consideration should be given to contact of all product-contact surfaces exposed to live culture and, where required, the transfer to a second vessel.
  59. A wide variety of equipment is used for chromatography. QRM principles should be used to devise the control strategy on matrices, the housings and associated equipment when used in campaign manufacture and in multi-product environments. The re-use of the same matrix at different stages of processing is discouraged. Acceptance criteria, operating conditions, regeneration methods, life span and sanitization or sterilisation methods of columns should be defined.
  60. Where irradiated equipment and materials are used, Annex 12 should be consulted for further guidance.
  61. There should be a system to assure the integrity and closure of containers after filling where the final products or intermediates represent a special risk and procedures to deal with any leaks or spillages. Filling and packaging operations need to have procedures in place to maintain the product within any specified limits, e.g. time and/or temperature.
  62. Activities in handling vials containing live biological agents, must be performed in such a way to prevent the contamination of other products or egress of the live

agents into the work environment or the external environment. The viability of such organisms and their biological classification should take into consideration as part of the management of such risks.

63. Care should be taken in the preparation, printing, storage and application of labels, including any specific text for patient-specific product of the contents on the immediate and outer packaging.

In the case of autologous products, the unique patient identifier and the statement “for autologous use only” should be indicated on the outer packaging or, where there is no outer packaging, on the immediate packaging.

64. The compatibility of labels with ultra-low storage temperatures, where such temperatures are used, should be verified.
65. Where donor (human or animal health) information becomes available after procurement, which affects product quality, it should be taken into account in recall procedures.

## QUALITY CONTROL

66. In-process controls have a greater importance in ensuring the consistency of the quality of biological active substance and medicinal products than for conventional products. In-process control testing should be performed at appropriate stages of production to control those conditions that are important for the quality of the finished product.
67. Where intermediates can be stored for extended periods of time (days, weeks or longer), consideration should be given to the inclusion of finished product batches made from materials held for their maximum in-process periods in the on-going stability programme.
68. (...) <sup>26</sup>
69. For cellular products, sterility tests should be conducted on antibiotic-free cultures of cells or cell banks to provide evidence for absence of bacterial and fungal contamination and to be able to detect fastidious organisms where appropriate.
70. For biological medicinal products with a short shelf life, which for the purposes of the annex is taken to mean a period that does not permit release when sterility testing results are provided after 14 days or less, and which need batch certification before completion of all end product quality control tests (e.g. sterility tests) a suitable control strategy must be in place. Such controls need to be built on enhanced understanding of product and process performance and take into account the controls and attributes of starting and raw materials. The exact and detailed description of the entire release procedure, including the responsibilities of the different personnel involved in assessment of production and analytical

---

<sup>26</sup> This line has been intentionally left blank to harmonise with the formatting structure of the EU GMP Guide.



data is essential. A continuous assessment of the effectiveness of the quality assurance system must be in place including records kept in a manner which permit trend evaluation.

Where end product tests are not available due to their short shelf life, alternative methods of obtaining equivalent data to permit batch certification should be considered (e.g. rapid microbiological methods). The procedure for batch certification and release may be carried out in two or more stages:

- (a) Assessment by designated person(s) of batch processing records, results from environmental monitoring (where available) which should cover production conditions, all deviations from normal procedures and the available analytical results for review in preparation for the initial certification by the Responsible Person.
- (b) Assessment of the final analytical tests and other information available for final certification by the Authorised Person. A procedure should be in place to describe the measures to be taken (including liaison with clinical staff) where out of specification test results are obtained. Such events should be fully investigated and the relevant corrective and preventive actions taken to prevent recurrence documented.

## **PART B: SPECIFIC GUIDANCE ON SELECTED PRODUCT TYPES**

### **B1. ANIMAL SOURCED PRODUCTS<sup>27</sup>**

This guidance applies to animal materials which includes materials from establishments such as abattoirs. Since the supply chains can be extensive and complex, controls based on QRM principles need to be applied, see also requirements of appropriate pharmacopoeial monographs, including the need for specific tests at defined stages. Documentation to demonstrate the supply chain traceability<sup>28</sup> and clear roles of participants in the supply chain, typically including a sufficiently detailed and current process map, should be in place.

1. Monitoring programmes should be in place for animal disease that are of concern to human health. Organisations should take into account reports from trustworthy sources on national disease prevalence when compiling their assessment of risk and mitigation factors. Such organisations include the World Organisation for Animal Health (OIE, Office International des Epizooties<sup>29</sup>). This should be supplemented by information on health monitoring and control programme(s) at national and local levels, the latter to include the sources (e.g. farm or feedlot) from which the animals are drawn and the control measures in place during transport to the abattoirs.
2. Where abattoirs are used to source animal tissues, they should be shown to operate to stringent standards. Account should be taken of reports from national

---

<sup>27</sup> In the EEA, see also PhEur monograph requirements, 0333

<sup>28</sup> See PIC/S GMP Chapter 5.

<sup>29</sup> [http://www.oie.int/eng/en\\_index.htm](http://www.oie.int/eng/en_index.htm)

regulatory organisations<sup>30</sup> which verify compliance with the requirements of food safety and quality, veterinary and plant health legislation.

3. Control measures for starting or raw materials at establishments such as abattoirs should include appropriate elements of a Quality Management System to assure a satisfactory level of operator training, materials traceability, control and consistency. These measures may be drawn from sources outside PIC/S GMP but should be shown to provide equivalent levels of control.
4. Control measures for starting or raw materials should be in place which prevent interventions which may affect the quality of materials, or which at least provides evidence of such activities, during their progression through the manufacturing and supply chain. This includes the movement of material between sites of initial collection, partial and final purification(s), storage sites, hubs, consolidators and brokers. Details of such arrangements should be recorded within the traceability system and any breaches recorded, investigated and actions taken.
5. Regular audits of the starting or raw material supplier should be undertaken which verify compliance with controls for materials at the different stages of manufacture. Issues must be investigated to a depth appropriate to their significance, for which full documentation should be available. Systems should also be in place to ensure that effective corrective and preventive actions are taken.

## **B2. ALLERGEN PRODUCTS**

Materials may be manufactured by extraction from natural sources or manufactured by recombinant DNA technology.

1. Source materials should be described in sufficient detail to ensure consistency in their supply, e.g. common and scientific name, origin, nature, contaminant limits, method of collection. Those derived from animals should be from healthy sources. Appropriate biosecurity controls should be in place for colonies (e.g. mites, animals) used for the extraction of allergens. Allergen products should be stored under defined conditions to minimise deterioration.
2. The production process steps including pre-treatment, extraction, filtration, dialysis, concentration or freeze-drying steps should be described in detail and validated.
3. The modification processes to manufacture modified allergen extracts (e.g. allergoids, conjugates) should be described. Intermediates in the manufacturing process should be identified and controlled.
4. Allergen extract mixtures should be prepared from individual extracts from single source materials. Each individual extract should be considered as one active substance.

---

<sup>30</sup> In the EEA, this is the Food and Veterinary Office [http://ec.europa.eu/food/fvo/index\\_en.htm](http://ec.europa.eu/food/fvo/index_en.htm).

### **B.3 ANIMAL IMMUNOSERA PRODUCTS**

1. Particular care should be exercised on the control of antigens of biological origin to assure their quality, consistency and freedom from adventitious agents. The preparation of materials used to immunise the source animals (e.g. antigens, hapten carriers, adjuvants, stabilising agents), the storage of such material immediately prior to immunisation should be in accordance with documented procedures.
2. The immunisation, test bleed and harvest bleed schedules should conform to those approved in the CTA or MA.
3. The manufacturing conditions for the preparation of antibody sub-fragments (e.g. Fab or F(ab')<sub>2</sub>) and any further modifications must be in accordance with validated and approved parameters. Where such enzymes are made up of several components, their consistency should be assured.

### **B.4 VACCINES**

1. Where eggs are used, the health status of all source flocks used in the production of eggs (whether specified pathogen free or healthy flocks) should be assured.
2. The integrity of containers used to store intermediate products and the hold times must be validated.
3. Vessels containing inactivated products should not be opened or sampled in areas containing live biological agents.
4. The sequence of addition of active ingredients, adjuvants and excipients during the formulation of an intermediate or final product must be in compliance with specifications.
5. Where organisms with a higher biological safety level (e.g. pandemic vaccine strains) are to be used in manufacture or testing, appropriate containment arrangements must be in place. The approval of such arrangements should be obtained from the appropriate national authority(ies) and the approval documents be available for verification.

### **B.5 RECOMBINANT PRODUCTS**

1. Process condition during cell growth, protein expression and purification must be maintained within validated parameters to assure a consistent product with a defined range of impurities that is within the capability of the process to reduce to acceptable levels. The type of cell used in production may require increased measures to be taken to assure freedom from viruses. For production involving multiple harvest, the period of continuous cultivation should be within specified limits.

2. The purification processes to remove unwanted host cell proteins, nucleic acids, carbohydrates, viruses and other impurities should be within defined validated limits.

## **B6. MONOCLONAL ANTIBODY PRODUCTS**

1. Monoclonal antibodies may be manufactured from murine hybridomas, human hybridomas or by recombinant DNA technology. Control measures appropriate to the different source cells (including feeder cells if used) and materials used to establish the hybridoma / cell line should be in place to assure the safety and quality of the product. It should be verified that these are within approved limits. Freedom from viruses should be given particular emphasis. It should be noted that data originating from products generated by the same manufacturing technology platform may be acceptable to demonstrate suitability.
2. Criteria to be monitored at the end of a production cycle and for early termination of production cycles should be verified that these are within approved limits.
3. The manufacturing conditions for the preparation of antibody sub-fragment (e.g. Fab, F(ab')<sub>2</sub>, scFv) and any further modifications (e.g. radio labelling, conjugation, chemical linking) must be in accordance with validated parameters.

## **B7. TRANSGENIC ANIMAL PRODUCTS**

Consistency of starting material from a transgenic source is likely to be more problematic than is normally the case for non-transgenic biotechnology sources. Consequently, there is an increased requirement to demonstrate batch-to-batch consistency of product in all respects.

1. A range of species may be used to produce biological medicinal products, which may be expressed into body fluids (e.g. milk) for collection and purification. Animals should be clearly and uniquely identified and backup arrangements should be put in place in the event of loss of the primary marker.
2. The arrangements for housing and care of the animals should be defined such that they minimise the exposure of the animals to pathogenic and zoonotic agents. Appropriate measures to protect the external environment should be established. A health-monitoring programme should be established and all results documented, any incident should be investigated and its impact on the continuation of the animal and on previous batches of product should be determined. Care should be taken to ensure that any therapeutic products used to treat the animals do not contaminate the product.
3. The genealogy of the founder animals through to production animals must be documented. Since a transgenic line will be derived from a single genetic founder animal, materials from different transgenic lines should not be mixed.
4. The conditions under which the product is harvested should be in accordance with CTA or MA conditions. The harvest schedule and conditions under which animals may be removed from production should be performed according to approved procedures and acceptance limits.

## **B8. TRANSGENIC PLANT PRODUCTS**

Consistency of starting material from a transgenic source is likely to be more problematic than is normally the case for non-transgenic biotechnology sources. Consequently, there is an increased requirement to demonstrate batch-to-batch consistency of product in all respects.

1. Additional measures, over and above those given in Part A, may be required to prevent contamination of master and working transgenic banks by extraneous plant materials and relevant adventitious agents. The stability of the gene within defined generation numbers should be monitored.
2. Plants should be clearly and uniquely identified, the presence of key plant features, including health status, across the crop should be verified at defined intervals through the cultivation period to assure consistency of yield between crops.
3. Security arrangements for the protection of crops should be defined, wherever possible, such that they minimise the exposure to contamination by microbiological agents and cross-contamination with non-related plants. Measures should be in place to prevent materials such as pesticides and fertilisers from contaminating the product. A monitoring programme should be established and all results documented, any incident should be investigated and its impact on the continuation of the crop in the production programme should be determined.
4. Conditions under which plants may be removed from production should be defined. Acceptance limits should be set for materials (e.g. host proteins) that may interfere with the purification process. It should be verified that the results are within approved limits.
5. Environmental conditions (temperature, rain), which may affect the quality attributes and yield of the recombinant protein from time of planting, through cultivation to harvest and interim storage of harvested materials should be documented. The principles in documents such as 'Guideline on Good Agricultural and Collection Practice for Starting Materials of Herbal Origin'<sup>31</sup> should be taken into account when drawing up such criteria.

## **GLOSSARY**

See Annex 2A

---

<sup>31</sup> EMA, WHO or equivalent

## ANNEX 3

# MANUFACTURE OF RADIOPHARMACEUTICALS

## PRINCIPLE

The manufacture of radiopharmaceuticals should be undertaken in accordance with the principles of Good Manufacturing Practice for Medicinal Products Part I and II. This annex specifically addresses some of the practices, which may be specific for radiopharmaceuticals.

Note i. Preparation of radiopharmaceuticals in radiopharmacies (hospitals or certain pharmacies), using Generators and Kits with a marketing authorisation or a national licence, is not covered by this guideline, unless covered by national requirement.

Note ii. According to radiation protection regulations it should be ensured that any medical exposure is under the clinical responsibility of a practitioner. In diagnostic and therapeutic nuclear medicine practices a medical physics expert should be available.

Note iii. This annex is also applicable to radiopharmaceuticals used in clinical trials.

Note iv. Transport of radiopharmaceuticals is regulated by the International Atomic Energy Association (IAEA) and radiation protection requirements.

Note v. It is recognised that there are acceptable methods, other than those described in this annex, which are capable of achieving the principles of Quality Assurance. Other methods should be validated and provide a level of Quality Assurance at least equivalent to those set out in this annex.

## INTRODUCTION

1. The manufacturing and handling of radiopharmaceuticals is potentially hazardous. The level of risk depends in particular upon the types of radiation, the energy of radiation and the half-lives of radioactive isotopes. Particular attention must be paid to the prevention of cross-contamination, to the retention of radionuclide contaminants, and to waste disposal.
2. Due to short shelf-life of their radionuclides, some radiopharmaceuticals may be released before completion of all quality control tests. In this case, the exact and detailed description of the whole release procedure including the responsibilities of the involved personnel and the continuous assessment of the effectiveness of the quality assurance system is essential.
3. This guideline is applicable to manufacturing procedures employed by industrial manufacturers, Nuclear Centres/Institutes and PET Centres for the production and quality control of the following types of products:

- Radiopharmaceuticals
- Positron Emitting (PET) Radiopharmaceuticals
- Radioactive Precursors for radiopharmaceutical production
- Radionuclide Generators

Type of manufacture	Non - GMP *	GMP part II & I (Increasing) including relevant annexes			
Radiopharmaceuticals PET Radiopharmaceuticals Radioactive Precursors	<i>Reactor/Cyclotron Production</i>	<i>Chemical synthesis</i>	<i>Purification steps</i>	<i>Processing, formulation and dispensing</i>	<i>Aseptic or final sterilization</i>
Radionuclide Generators	<i>Reactor/Cyclotron Production</i>	<i>Processing</i>			

\* *Target and transfer system from cyclotron to synthesis rig may be considered as the first step of active substance manufacture.*

4. The manufacturer of the final radiopharmaceutical should describe and justify the steps for manufacture of the active substance and the final medicinal product and which GMP (part I or II) applies for the specific process/manufacturing steps.
5. Preparation of radiopharmaceuticals involves adherence to regulations on radiation protection.
6. Radiopharmaceuticals to be administered parenterally should comply with sterility requirements for parenterals and, where relevant, aseptic working conditions for the manufacture of sterile medicinal products, which are covered in PIC/S GMP Guide, Annex 1.
7. Specifications and quality control testing procedures for the most commonly used radiopharmaceuticals are specified in the European (or other relevant) Pharmacopoeia or in the marketing authorisation.

#### *Clinical Trials*

8. Radiopharmaceuticals intended for use in clinical trials as investigational medicinal products should in addition be produced in accordance with the principles in PIC/S GMP Guide, Annex 13.

## **QUALITY ASSURANCE**

9. Quality assurance is of even greater importance in the manufacture of radiopharmaceuticals because of their particular characteristics, low volumes and in some circumstances the need to administer the product before testing is complete.
10. As with all pharmaceuticals, the products must be well protected against contamination and cross-contamination. However, the environment and the operators must also be protected against radiation. This means that the role of an effective quality assurance system is of the utmost importance.

11. It is important that the data generated by the monitoring of premises and processes are rigorously recorded and evaluated as part of the release process.
12. The principles of qualification and validation should be applied to the manufacturing of radiopharmaceuticals and a risk management approach should be used to determine the extent of qualification/validation, focusing on a combination of Good Manufacturing Practice and Radiation Protection.

## **PERSONNEL**

13. All manufacturing operations should be carried out under the responsibility of personnel with additional competence in radiation protection. Personnel involved in production, analytical control and release of radiopharmaceuticals should be appropriately trained in radiopharmaceutical specific aspects of the quality management system. The Authorised Person should have the overall responsibility for release of the products.
- 14.. All personnel (including those concerned with cleaning and maintenance) employed in areas where radioactive products are manufactured should receive additional training adapted to this class of products. .
15. Where production facilities are shared with research institutions, the research personnel must be adequately trained in GMP regulations and the QA function must review and approve the research activities to ensure that they do not pose any hazard to the manufacturing of radiopharmaceuticals.

## **PREMISES AND EQUIPMENT**

### **General**

16. Radioactive products should be manufactured in controlled (environmental and radioactive) areas. All manufacturing steps should take place in self-contained facilities dedicated to radiopharmaceuticals
17. Measures should be established and implemented to prevent cross-contamination from personnel, materials, radionuclides etc. Closed or contained equipment should be used whenever appropriate. Where open equipment is used, or equipment is opened, precautions should be taken to minimize the risk of contamination. The risk assessment should demonstrate that the environmental cleanliness level proposed is suitable for the type of product being manufactured.
18. Access to the manufacturing areas should be via a gowning area and should be restricted to authorised personnel.
19. Workstations and their environment should be monitored with respect to radioactivity, particulate and microbiological quality as established during performance qualification (PQ).



20. Preventive maintenance, calibration and qualification programmes should be operated to ensure that all facilities and equipment used in the manufacture of radiopharmaceutical are suitable and qualified. These activities should be carried out by competent personnel and records and logs should be maintained.
21. Precautions should be taken to avoid radioactive contamination within the facility. Appropriate controls should be in place to detect any radioactive contamination, either directly through the use of radiation detectors or indirectly through a swabbing routine.
22. Equipment should be constructed so that surfaces that come into contact with the product are not reactive, additive or absorptive so as to alter the quality of the radiopharmaceutical.
23. Re-circulation of air extracted from area where radioactive products are handled should be avoided unless justified. Air outlets should be designed to minimize environmental contamination by radioactive particles and gases and appropriate measures should be taken to protect the controlled areas from particulate and microbial contamination.
24. In order to contain radioactive particles, it may be necessary for the air pressure to be lower where products are exposed, compared with the surrounding areas. However, it is still necessary to protect the product from environmental contamination. This may be achieved by, for example, using barrier technology or airlocks, acting as pressure sinks.

### **Sterile production**

25. Sterile radiopharmaceuticals may be divided into those, which are manufactured aseptically, and those, which are terminally sterilised. The facility should maintain the appropriate level of environmental cleanliness for the type of operation being performed. For manufacture of sterile products the working zone where products or containers may be exposed to the environment, the cleanliness requirements should comply with the requirements described in the PIC/S GMP Guide, Annex 1.
26. For manufacture of radiopharmaceuticals a risk assessment may be applied to determine the appropriate pressure differences, air flow direction and air quality.
27. In case of use of closed and automated systems (chemical synthesis, purification, on-line sterile filtration) a grade C environment (usually "Hot-cell") will be suitable. Hot-cells should meet a high degree of air cleanliness, with filtered feed air, when closed. Aseptic activities must be carried out in a grade A area.
28. Prior to the start of manufacturing, assembly of sterilised equipment and consumables (tubing, sterilised filters and sterile closed and sealed vials to a sealed fluid path) must be performed under aseptic conditions

### **DOCUMENTATION**

29. All documents related to the manufacture of radiopharmaceuticals should be prepared, reviewed, approved and distributed according to written procedures.

30. Specifications should be established and documented for raw materials, labelling and packaging materials, critical intermediates and the finished radiopharmaceutical. Specifications should also be in place for any other critical items used in the manufacturing process, such as process aids, gaskets, sterile filtering kits, that could critically impact on quality.
31. Acceptance criteria should be established for the radiopharmaceutical including criteria for release and shelf life specifications (examples: chemical identity of the isotope, radioactive concentration, purity, and specific activity).
32. Records of major equipment use, cleaning, sanitisation or sterilisation and maintenance should show the product name and batch number, where appropriate, in addition to the date and time and signature for the persons involved in these activities.
33. Records should be retained for at least 3 years unless another timeframe is specified in national requirements.

## **PRODUCTION**

34. Production of different radioactive products in the same working area (i.e. hot-cell, LAF unit), at the same time should be avoided in order to minimise the risk of cross-contamination or mix-up.
35. Special attention should be paid to validation including validation of computerised systems which should be carried out in accordance in compliance PIC/S GMP Guide, Annex 11. New manufacturing processes should be validated prospectively.
36. The critical parameters should normally be identified before or during validation and the ranges necessary for reproducible operation should be defined.
37. Integrity testing of the membrane filter should be performed for aseptically filled products, taking into account the need for radiation protection and maintenance of filter sterility.
38. Due to radiation exposure it is accepted that most of the labelling of the direct container, is done prior to manufacturing. Sterile empty closed vials may be labelled with partial information prior to filling providing that this procedure does not compromise sterility or prevent visual control of the filled vial.

## QUALITY CONTROL

39. Some radiopharmaceuticals may have to be distributed and used on the basis of an assessment of batch documentation and before all chemical and microbiology tests have been completed.  
Radiopharmaceutical product release may be carried out in two or more stages, before and after full analytical testing:
- a) Assessment by a designated person of batch processing records, which should cover production conditions and analytical testing performed thus far, before allowing transportation of the radiopharmaceutical under quarantine status to the clinical department.
  - b) Assessment of the final analytical data, ensuring all deviations from normal procedures are documented, justified and appropriately released prior to documented certification by the Authorised Person. Where certain test results are not available before use of the product, the Authorised Person should conditionally certify the product before it is used and should finally certify the product after all the test results are obtained.
40. Most radiopharmaceuticals are intended for use within a short time and the period of validity with regard to the radioactive shelf-life, must be clearly stated.
41. Radiopharmaceuticals having radionuclides with long half-lives should be tested to show, that they meet all relevant acceptance criteria before release and certification by the Authorised Person.
42. Before testing is performed samples can be stored to allow sufficient radioactivity decay. All tests including the sterility test should be performed as soon as possible.
43. A written procedure detailing the assessment of production and analytical data, which should be considered before the batch is dispatched, should be established.
44. Products that fail to meet acceptance criteria should be rejected. If the material is reprocessed, pre-established procedures should be followed and the finished product should meet acceptance criteria before release. Returned products may not be reprocessed and must be stored as radioactive waste.
45. A procedure should also describe the measures to be taken by Authorised Person if unsatisfactory test results (Out-of-Specification) are obtained after dispatch and before expiry. Such events should be investigated to include the relevant corrective and preventative actions taken to prevent future events.  
This process must be documented.
46. Information should be given to the clinical responsible persons, if necessary. To facilitate this, a traceability system should be implemented for radiopharmaceuticals.
47. A system to verify the quality of starting materials should be in place. Supplier approval should include an evaluation that provides adequate assurance that the

material consistently meets specifications. The starting materials, packaging materials and critical process aids should be purchased from approved suppliers.

## REFERENCE AND RETENTION SAMPLES

48. For radiopharmaceuticals sufficient samples of each batch of bulk formulated product should be retained for at least six months after expiry of the finished medicinal product unless otherwise justified through risk management.
49. Samples of starting materials, other than solvents gases or water used in the manufacturing process should be retained for at least two years after the release of the product. That period may be shortened if the period of stability of the material as indicated in the relevant specification is shorter.
50. Other conditions may be defined by agreement with the competent authority, for the sampling and retaining of starting materials and products manufactured individually or in small quantities or when their storage could raise special problems.

## DISTRIBUTION

51. Distribution of the finished product under controlled conditions, before all appropriate test results are available, is acceptable for radiopharmaceuticals, providing the product is not administered by the receiving institute until satisfactory test results has been received and assessed by a designated person.

## GLOSSARY

**Preparation:** handling and radiolabelling of kits with radionuclide eluted from generators or radioactive precursors within a hospital. Kits, generators and precursors should have a marketing authorisation or a national licence.

**Manufacturing:** production, quality control and release and delivery of radiopharmaceuticals from the active substance and starting materials.

**Hot-cells:** shielded workstations for manufacture and handling of radioactive materials. Hot-cells are not necessarily designed as an isolator.

**Authorised person:** Person recognised by the authority as having the necessary basic scientific and technical background and experience.

## ANNEX 4

# MANUFACTURE OF VETERINARY MEDICINAL PRODUCTS OTHER THAN IMMUNOLOGICALS

## MANUFACTURE OF PREMIXES FOR MEDICATED FEEDING STUFFS

For the purposes of these paragraphs,

- *a medicated feeding stuff* is any mixture of a veterinary medicinal product or products and feed or feeds which is ready prepared for marketing and intended to be fed to animals without further processing because of its curative or preventative properties or other properties (e.g. medical diagnosis, restoration, correction or modification of physiological functions in animals):
  - *a pre-mix for medicated feeding stuffs* is any veterinary medicinal product prepared in advance with a view to the subsequent manufacture of medicated feeding stuffs.
1. The manufacture of premixes for medicated feeding stuffs requires the use of large quantities of vegetable matter which is likely to attract insects and rodents. Premises should be designed, equipped and operated to minimize this risk (point 3.4.) and should also be subject to a regular pest control programme.
  2. Because of the large volume of dust generated during the production of bulk material for premixes, specific attention should be given to the need to avoid cross contamination and facilitate cleaning (point 3.14), for example through the installation of sealed transport systems and dust extraction, whenever possible. The installation of such systems does not, however, eliminate the need for regular cleaning of production areas.
  3. Parts of the process likely to have a significant adverse influence on the stability of the active ingredients) (e.g. use of steam in pellet manufacture) should be carried out in a uniform manner from batch to batch.
  4. Consideration should be given to undertake the manufacture of premixes in dedicated areas which, if at all possible, do not form part of a main manufacturing plant. Alternatively, such dedicated areas should be surrounded by a buffer zone in order to minimize the risk of contamination of other manufacturing areas.

## **THE MANUFACTURE OF ECTOPARASITICIDES**

5. In derogation from point 3.6, ectoparasiticides for external application to animals, which are veterinary medicinal products, and subject to marketing authorisation, may be produced and filled on a campaign basis in pesticide specific areas. However, other categories of veterinary medicinal products should not be produced in such areas.
6. Adequate validated cleaning procedures should be employed to prevent cross contamination, and steps should be taken to ensure the secure storage of the veterinary medicinal product in accordance with the guide.

## **THE MANUFACTURE OF VETERINARY MEDICINAL PRODUCTS CONTAINING PENICILLINS**

7. The use of penicillins in veterinary medicine does not present the same risks of hypersensitivity in animals as in humans. Although incidents of hypersensitivity have been recorded in horses and dogs, there are other materials which are toxic to certain species, e.g. the ionophore antibiotics in horses. Although desirable, the requirements that such products be manufactured in dedicated, self-contained facilities (point 3.6) may be dispensed with in the case of facilities dedicated to the manufacture of veterinary medicinal products only. However, all necessary measures should be taken to avoid cross contamination and any risk to operator safety in accordance with the guide. In such circumstances, penicillin-containing products should be manufactured on a campaign basis and should be followed by appropriate, validated decontamination and cleaning procedures.

## **RETENTION OF SAMPLES (POINT 1.4. VIII AND POINT 6.14.)**

8. It is recognized that because of the large volume of certain veterinary medicinal products in their final packaging, in particular premixes, it may not be feasible for manufacturers to retain samples from each batch in its final packaging. However, manufacturers should ensure that sufficient representative samples of each batch are retained and stored in accordance with the guide.
9. In all cases, the container used for storage should be composed of the same material as the market primary container in which the product is marketed.

## **STERILE VETERINARY MEDICINAL PRODUCTS**

10. Where this has been accepted by the competent authorities, terminally sterilized veterinary medicinal products may be manufactured in a clean area of a lower grade than the grade required in the annex on "Sterile preparations", but at least in a grade D environment.

## **ANNEX 5**

# **MANUFACTURE OF IMMUNOLOGICAL VETERINARY MEDICAL PRODUCTS**

## **PRINCIPLE**

The manufacture of immunological veterinary medicinal products has special characteristics which should be taken into consideration when implementing and assessing the quality assurance system.

Due to the large number of animal species and related pathogenic agents, the variety of products manufactured is very wide and the volume of manufacture is often low; hence, work on a campaign basis is common. Moreover, because of the very nature of this manufacture (cultivation steps, lack of terminal sterilization, etc.), the products must be particularly well protected against contamination and cross-contamination. The environment also must be protected especially when the manufacture involves the use of pathogenic or exotic biological agents and the worker must be particularly well protected when the manufacture involves the use of biological agents pathogenic to man.

These factors, together with the inherent variability of immunological veterinary medicinal products and the relative inefficiency in particular of final product quality control tests in providing adequate information about products, means that the role of the quality assurance system is of the utmost importance. The need to maintain control over all of the following aspects of GMP, as well as those outlined in this Guide, cannot be overemphasized. In particular, it is important that the data generated by the monitoring of the various aspects of GMP (equipment, premises, product etc.) are rigorously assessed and informed decisions, leading to appropriate action, are made and recorded.

## **PERSONNEL**

1. All personnel (including those concerned with cleaning and maintenance) employed in areas where immunological products are manufactured should be given training in and information on hygiene and microbiology. They should receive additional training specific to the products with which they work.
2. Responsible personnel should be formally trained in some or all of the following fields: bacteriology, biology, biometry, chemistry, immunology, medicine, parasitology, pharmacy, pharmacology, virology and veterinary medicine and should also have an adequate knowledge of environmental protection measures.

3. Personnel should be protected against possible infection with the biological agents used in manufacture. In the case of biological agents known to cause disease in humans, adequate measures should be taken to prevent infection of personnel working with the agent or with experimental animals.

Where relevant, the personnel should be vaccinated and subject to medical examination.

4. Adequate measures should be taken to prevent biological agents being taken outside the manufacturing plant by personnel acting as a carrier. Dependent on the type of biological agent, such measures may include complete change of clothes and compulsory showering before leaving the production area.

5. For immunological products, the risk of contamination or cross-contamination by personnel is particularly important.

Prevention of contamination by personnel should be achieved by a set of measures and procedures to ensure that appropriate protective clothing is used during the different stages of the production process.

Prevention of cross-contamination by personnel involved in production should be achieved by a set of measures and procedures to ensure that they do not pass from one area to another unless they have taken appropriate measures to eliminate the risk of contamination. In the course of a working day, personnel should not pass from areas where contamination with live microorganisms is likely or where animals are housed to premises where other products or organisms are handled. If such a passage is unavoidable, clearly defined decontamination procedures, including change of clothing and shoes, and, where necessary, showering, should be followed by staff involved in any such production.

Personnel entering a contained area where organisms had not been handled in open circuit operations in the previous twelve hours to check on cultures in sealed, surface decontaminated flasks would not be regarded as being at risk of contamination, unless the organism involved was an exotic.

## **PREMISES**

6. Premises should be designed in such a way as to control both the risk to the product and to the environment.

This can be achieved by the use of containment, clean, clean/contained or controlled areas.

7. Live biological agents should be handled in contained areas. The level of containment should depend on the pathogenicity of the microorganism and whether it has been classified as exotic.

8. Inactivated biological agents should be handled in clean areas. Clean areas should also be used when handling non-infected cells isolated from multicellular organisms and, in some cases, filtration-sterilized media.



9. Open circuit operations involving products or components not subsequently sterilized should be carried out within a laminar air flow work station (grade A) in a grade B area.
10. Other operations where live biological agents are handled (quality control, research and diagnostic services, etc.) should be appropriately, contained and separated if production operations are carried out in the same building. The level of containment should depend on the pathogenicity of the biological agent and whether they have been classified as exotic. Whenever diagnostic activities are carried out, there is the risk of introducing highly pathogenic organisms. Therefore, the level of containment should be adequate to cope with all such risks. Containment may also be required if quality control or other activities are carried out in buildings in close proximity to those used for production.
11. Containment premises should be easily disinfected and should have the following characteristics:
  - a) The absence of direct venting to the outside;
  - b) a ventilation with air at negative pressure. Air should be extracted through HEPA filters and not be recirculated except to the same area, and provided further HEPA filtration is used (normally this condition would be met by routing the recirculated air through the normal supply HEPAs for that area). However, recycling of air between areas may be permissible provided that it passes through two exhaust HEPAs, the first of which is continuously monitored for integrity, and there are adequate measures for safe venting of exhaust air should this filter fail;
  - c) air from manufacturing areas used for the handling of exotic organisms should be vented through 2 sets of HEPA filters in series, and that from production areas not recirculated;
  - d) a system for the collection and disinfection of liquid effluents including contaminated condensate from sterilizers, biogenerators, etc. Solid wastes, including animal carcasses, should be disinfected, sterilized or incinerated as appropriate. Contaminated filters should be removed using a safe method;
  - e) changing rooms designed and used as air locks, and equipped with washing and showering facilities if appropriate. Air pressure differentials should be such that there is no flow of air between the work area and the external environment or risk of contamination of outer clothing worn outside the area;
  - f) an air lock system for the passage of equipment, which is constructed so that there is no flow of contaminated air between the work area and the external environment or risk of contamination of equipment within the lock. The air lock should be of a size which enables the effective surface decontamination of materials being passed through it. Consideration should be given to having a timing device on the door interlock to allow sufficient time for the decontamination process to be effective.
  - g) in many instances, a barrier double-door autoclave for the secure removal of waste materials and introduction of sterile items.

12. Equipment passes and changing rooms should have an interlock mechanism or other appropriate system to prevent the opening of more than one door at a time. Changing rooms should be supplied with air filtered to the same standard as that for the work area, and extracts to produce an adequate air circulation independent of that of the work area. Equipment passes should normally be ventilated in the same way, but unventilated passes, or those equipped with supply air only, may be acceptable.
13. Production operations such as cell maintenance, media preparation, virus culture, etc. likely to cause contamination should be performed in separate areas. Animals and animal products should be handled with appropriate precautions.
14. Production areas where biological agents particularly resistant to disinfection (e.g. spore-forming bacteria) are handled should be separated and dedicated to that particular purpose until the biological agents have been inactivated.
15. With the exception of blending and subsequent filling operations, one biological agent only should be handled at a time within an area.
16. Production areas should be designed to permit disinfection between campaigns, using validated methods.
17. Production of biological agents may take place in controlled areas provided it is carried out in totally enclosed and heat sterilized equipment, all connections being also heat sterilized after making and before breaking. It may be acceptable for connections to be made under local laminar air flow provided these are few in number and proper aseptic techniques are used and there is no risk of leakage. The sterilization parameters used before breaking the connections must be validated for the organisms being used. Different products may be placed in different biogenerators, within the same area, provided that there is no risk of accidental cross-contamination. However, organisms generally subject to special requirements for containment should be in areas dedicated to such products.
18. Animal houses where animals intended or used for production are accommodated, should be provided with the appropriate containment and/or clean area measures, and should be separate from other animal accommodation.  
  
Animal houses where animals used for quality control, involving the use of pathogenic biological agents, are accommodated, should be adequately contained.
19. Access to manufacturing areas should be restricted to authorised personnel. Clear and concise written procedures should be posted as appropriate.
20. Documentation relating to the premises should be readily available in a plant master file.  
  
The manufacturing site and buildings should be described in sufficient detail (by means of plans and written explanations) so that the designation and conditions of use of all the rooms are correctly identified as well as the biological agents which are handled in them. The flow of people and product should also be clearly marked.  
  
The animal species accommodated in the animal houses or otherwise on the site should be identified.

The activities carried out in the vicinity of the site should also be indicated.

Plans of contained and/or clean area premises, should describe the ventilation system indicating inlets and outlets, filters and their specifications, the number of air changes per hour, and pressure gradients. They should indicate which pressure gradients are monitored by pressure indicator.

## EQUIPMENT

21. The equipment used should be designed and constructed so that it meets the particular requirements for the manufacture of each product.

Before being put into operation the equipment should be qualified and validated and subsequently be regularly maintained and validated.

22. Where appropriate, the equipment should ensure satisfactory primary containment of the biological agents.

Where appropriate, the equipment should be designed and constructed as to allow easy and effective decontamination and/or sterilization.

23. Closed equipment used for the primary containment of the biological agents should be designed and constructed as to prevent any leakage or the formation of droplets and aerosols.

Inlets and outlets for gases should be protected so as to achieve adequate containment e.g. by the use of sterilizing hydrophobic filters.

The introduction or removal of material should take place using a sterilizable closed system, or possibly in an appropriate laminar air flow.

24. Equipment where necessary should be properly sterilized before use, preferably by pressurized dry steam. Other methods can be accepted if steam sterilization cannot be used because of the nature of the equipment. It is important not to overlook such individual items as bench centrifuges and water baths.

Equipment used for purification, separation or concentration should be sterilized or disinfected at least between use for different products. The effect of the sterilization methods on the effectiveness and validity of the equipment should be studied in order to determine the life span of the equipment.

All sterilization procedures should be validated.

25. Equipment should be designed so as to prevent any mix-up between different organisms or products. Pipes, valves and filters should be identified as to their function.

Separate incubators should be used for infected and non-infected containers and also generally for different organisms or cells. Incubators containing more than one organism or cell type will only be acceptable if adequate steps are taken to seal, surface decontaminate and segregate the containers. Culture vessels, etc. should be individually labelled. The cleaning and disinfection of the items can be particularly difficult and should receive special attention.

Equipment used for the storage of biological agents or products should be designed and used in such a manner as to prevent any possible mix-up. All stored items should be clearly and unambiguously labelled and in leak-proof containers. Items such as cells and organisms seed stock should be stored in dedicated equipment.

26. Relevant equipment, such as that requiring temperature control, should be fitted with recording and/or alarm systems.

To avoid breakdowns, a system of preventive maintenance, together with trend analyses of recorded data, should be implemented.

27. The loading of freeze driers requires an appropriate clean/contained area.

Unloading freeze driers contaminates the immediate environment. Therefore, for single-ended freeze driers, the clean room should be decontaminated before a further manufacturing batch is introduced into the area, unless this contains the same organisms, and double door freeze driers should be sterilized after each cycle unless opened in a clean area.

Sterilization of freeze driers should be done in accordance with item 23. In case of campaign working, they should at least be sterilized after each campaign.

## **ANIMALS AND ANIMAL HOUSES**

28. ...

29. Animal houses should be separated from the other production premises and suitably designed.

30. The sanitary status of the animals used for production should be defined, monitored, and recorded. Some animals should be handled as defined in specific monographs (e.g. Specific Pathogens Free flocks).

31. Animals, biological agents, and tests carried out should be the subject of an identification system so as to prevent any risk of confusion and to control all possible hazards.

## **DISINFECTION - WASTE DISPOSAL**

32. Disinfection and/or wastes and effluents disposal may be particularly important in the case of manufacture of immunological products. Careful consideration should therefore be given to procedures and equipment aiming at avoiding environmental contamination as well as to their validation and qualification.

## **PRODUCTION**

33. Because of the wide variety of products, the frequently large number of stages involved in the manufacture of immunological veterinary medicinal products and the nature of the biological processes, careful attention must be paid to adherence to validated operating procedures, to the constant monitoring of production at all stages and to in-process controls.

34. Additionally, special consideration should be given to starting materials, media and the use of a seed lot system.

## **STARTING MATERIALS**

35. The suitability of starting materials should be clearly defined in written specifications. These should include details of the supplier, the method of manufacture, the geographical origin and the animal species from which the materials are derived. The controls to be applied to starting materials must be included. Microbiological controls are particularly important.
36. The results of tests on starting materials must comply with the specifications. Where the tests take a long time (e.g. eggs from SPF flocks) it may be necessary to process starting materials before the results of analytical controls are available. In such cases, the release of a finished product is conditional upon satisfactory results of the tests on starting materials.
37. Special attention should be paid to a knowledge of the supplier's quality assurance system in assessing the suitability of a source and the extent of quality control testing required.
38. Where possible, heat is the preferred method for sterilizing starting materials. If necessary, other validated methods, such as irradiation, may be used.

### *Media*

39. The ability of media to support the desired growth should be properly validated in advance.
40. Media should preferably be sterilized in situ or in line. Heat is the preferred method. Gases, media, acids, alkalis, defoaming agents and other materials introduced into sterile biogenerators should themselves be sterile.

### *Seed lot and cell bank system*

41. In order to prevent the unwanted drift of properties which might ensue from repeated subcultures or multiple generations, the production of immunological veterinary medicinal products obtained by microbial, cell or tissue culture, or propagation in embryos and animals, should be based on a system of seed lots and/or cell banks.
42. The number of generations (doublings, passages) between the seed lot or cell bank and the finished product should be consistent with the dossier of authorisation for marketing.
43. Seed lots and cell banks should be adequately characterized and tested for contaminants. Acceptance criteria for new seed lots should be established. Seed lots and cell banks should be established, stored and used in such a way as to minimize the risks of contamination, or any alteration. During the establishment of the seed lot and cell bank, no other living or infectious material (e.g. virus or cell lines) should be handled simultaneously in the same area or by the same person.
44. Establishment of the seed lot and cell bank should be performed in a suitable environment to protect the seed lot and the cell bank and, if applicable, the personnel handling it and the external environment.
45. The origin, form and storage conditions of seed material should be described in full. Evidence of the stability and recovery of the seeds and banks should be provided. Storage containers should be hermetically sealed, clearly labelled and

---

stored at an appropriate temperature. Storage conditions should be properly monitored. An inventory should be kept and each container accounted for.

46. Only authorised personnel should be allowed to handle the material and this handling should be done under the supervision of a responsible person. Different seed lots or cell banks should be stored in such a way to avoid confusion or cross-contamination errors. It is desirable to split the seed lots and cell banks and to store the parts at different locations so as to minimize the risk of total loss.

*Operating principles*

47. The formation of droplets and the production of foam should be avoided or minimized during manufacturing processes. centrifugation and blending procedures which can lead to droplet formation should be carried out in appropriate contained or clean/contained areas to prevent transfer of live organisms.
48. Accidental spillages, especially of live organisms, must be dealt with quickly and safely. Validated decontamination measures should be available for each organism. Where different strains of single bacteria species or very similar viruses are involved, the process need be validated against only one of them, unless there is reason to believe that they may vary significantly in their resistance to the agent(s) involved.
49. Operations involving the transfer of materials such as sterile media, cultures or product should be carried out in pre-sterilized closed systems wherever possible. Where this is not possible, transfer operations must be protected by laminar airflow work stations.
50. Addition of media or cultures to biogenerators and other vessels should be carried out under carefully controlled conditions to ensure that contamination is not introduced. Care must be taken to ensure that vessels are correctly connected when addition of cultures takes place.
51. When necessary, for instance when two or more fermentors are within a single area, sampling and addition ports, and connectors (after connection, before the flow of product, and again before disconnection) should be sterilized with steam. In other circumstances, chemical disinfection of ports and laminar air flow protection of connections may be acceptable.
52. Equipment, glassware, the external surfaces of product containers and other such materials must be disinfected before transfer from a contained area using a validated method (see 47 above). Batch documentation can be a particular problem. only the absolute minimum required to allow operations to GMP standards should enter and leave the area. If obviously contaminated, such as by spills or aerosols, or if the organism involved is an exotic, the paperwork must be adequately disinfected through an equipment pass, or the information transferred out by such means as photocopy or fax.
53. Liquid or solid wastes such as the debris after harvesting eggs, disposable culture bottles, unwanted cultures or biological agents, are best sterilized or disinfected before transfer from a contained area. However, alternatives such as sealed containers or piping may be appropriate in some cases.
54. Articles and materials, including documentation, entering a production room should be carefully controlled to ensure that only materials concerned with production are introduced. There should be a system which ensures that materials entering a room are reconciled with those leaving so that accumulation

of materials within the room does not occur.

55. Heat stable articles and materials entering a clean area or clean/contained area should do so through a double-ended autoclave or oven. Heat labile articles and materials should enter through an airlock with interlocked doors where they are disinfected. Sterilization of articles and materials elsewhere is acceptable provided that they are double wrapped and enter through an airlock with the appropriate precautions.
56. Precautions must be taken to avoid contamination or confusion during incubation. There should be a cleaning and disinfection procedure for incubators. Containers in incubators should be carefully and clearly labelled.
57. With the exception of blending and subsequent filling operations (or when totally enclosed systems are used) only one live biological agent may be handled within a production room at any given time. Production rooms must be effectively disinfected between the handling of different live biological agents.
58. Products should be inactivated by the addition of inactivant accompanied by sufficient agitation. The mixture should then be transferred to a second sterile vessel, unless the container is of such a size and shape as to be easily inverted and shaken so as to wet all internal surfaces with the final culture/ inactivant mixture.
59. Vessels containing inactivated product should not be opened or sampled in areas containing live biological agents. All subsequent processing of inactivated products should take place in clean areas grade A-B or enclosed equipment dedicated to inactivated products.
60. Careful consideration should be given to the validation of methods for sterilization, disinfection, virus removal and inactivation.
61. Filling should be carried out as soon as possible following production. Containers of bulk product prior to filling should be sealed, appropriately labelled and stored under specified conditions of temperature.
62. There should be a system to assure the integrity and closure of containers after filling.
63. The capping of vials containing live biological agents must be performed in such a way that ensures that contamination of other products or escape of the live agents into other areas or the external environment does not occur.
64. For various reasons there may be a delay between the filling of final containers and their labelling and packaging. Procedures should be specified for the storage of unlabelled containers in order to prevent confusion and to ensure satisfactory storage conditions. Special attention should be paid to the storage of heat labile or photosensitive products. Storage temperatures should be specified.
65. For each stage of production, the yield of product should be reconciled with that expected from that process. Any significant discrepancies should be investigated.

## QUALITY CONTROL

66. In-process controls play a specially important role in ensuring the consistency of the quality of biological medicinal products. Those controls which are crucial for the quality (e.g. virus removal) but which cannot be carried out on the finished

67. It may be necessary to retain samples of intermediate products in sufficient amount and under appropriate storage conditions to allow repetition or confirmation of a batch control.
68. There may be a requirement for the continuous monitoring of data during a production process, for example monitoring of physical parameters during fermentation.
69. Continuous culture of biological products is a common practice and special consideration needs to be given to the quality control requirements arising from this type of production method.



## ANNEX 6

# MANUFACTURE OF MEDICINAL GASES

### PRINCIPLE

This Annex deals with the manufacture of active substance gases and the manufacture of medicinal gases.

The delineation between the manufacture of the active substance and the manufacture of the medicinal product should be clearly defined in each Marketing Authorisation dossier. Normally, the production and purification steps of the gas belong to the field of manufacture of active substances. Gases enter the pharmaceutical field from the first storage of gas intended for such use.

Manufacture of active substance gases should comply with the Basic Requirements of this Guide (Part II), with the relevant part of this Annex, and with the other Annexes of the Guide if relevant.

Manufacture of medicinal gases should comply with the basic requirements of this Guide (Part I), with the relevant part of this Annex and with the other Annexes of the Guide if relevant.

In the exceptional cases of continuous processes where no intermediate storage of gas between the manufacture of the active substance and the manufacture of the medicinal product is possible, the whole process (from starting materials of active substance to medicinal finished product) should be considered as belonging to the pharmaceutical field. This should be clearly stated in the Marketing Authorisation dossier.

The Annex does not cover the manufacture and handling of medicinal gases in hospitals unless this is considered industrial preparation or manufacturing. However, relevant parts of this Annex may be used as a basis for such activities.

#### ***Manufacture of active substance gases***

Active substance gases can be prepared by chemical synthesis or be obtained from natural sources followed by purification steps, if necessary (as for example in an air separation plant).

1. The processes corresponding to these two methods of manufacturing active substance gases should comply with Part II of the Basic Requirements. However:
  - (a) the requirements regarding starting materials for active substances (Part II, Chapter 7) do not apply to the production of active substance gases by air separation (however, the manufacturer should ensure that the quality of ambient air is suitable for the established process and any changes in the quality of ambient air do not affect the quality of the active substance gas);

- (b) the requirements regarding on-going stability studies (Part II, Chapter 11.5), which are used to confirm storage conditions and expiry/retest dates (Part II, Chapter 11.6), do not apply in case initial stability studies have been replaced by bibliographic data; and
  - (c) the requirements regarding reserve/retention samples (Part II, Chapter 11.7) do not apply to active substance gases, unless otherwise specified.
- 2. The production of active substance gases through a continuous process (e.g. air separation) should be continuously monitored for quality. The results of this monitoring should be kept in a manner permitting trend evaluation.
  - 3. In addition:
    - (a) transfers and deliveries of active substance gases in bulk should comply with the same requirements as those mentioned below for the medicinal gases (sections 19 to 21 of this Annex);
    - (b) filling of active substance gases into cylinders or into mobile cryogenic vessels should comply with the same requirements as those mentioned below for the medicinal gases (sections 22 to 37 of this Annex) as well as Part II Chapter 9.

### ***Manufacture of medicinal gases***

Manufacture of medicinal gases is generally carried out in closed equipment. Consequently, environmental contamination of the product is minimal. However, risks of contamination (or cross contamination with other gases) may arise, in particular because of the reuse of containers.

- 4. Requirements applying to cylinders should also apply to cylinders bundles (except storage and transportation under cover).

## **PERSONNEL**

- 5. All personnel involved in the manufacture and distribution of medicinal gases should receive an appropriate GMP training applying to this type of products. They should be aware of the critically important aspects and potential hazards for patients from these products.
- 6. Personnel of subcontractors that could influence the quality of medicinal gases (such as personnel in charge of maintenance of cylinders or valves) should be appropriately trained.

## PREMISES AND EQUIPMENT

### Premises

7. Cylinders and mobile cryogenic vessels should be checked, prepared, filled and stored in a separate area from non-medicinal gases, and there should be no exchange of cylinders/mobile cryogenic vessels between these areas. However, it could be accepted to check, prepare, fill and store other gases in the same areas, provided they comply with the specifications of medicinal gases and that the manufacturing operations are performed according to GMP standards.
8. Premises should provide sufficient space for manufacturing, testing and storage operations to avoid the risk of mix-up. Premises should be designated to provide:
  - a) separate marked areas for different gases;
  - b) clear identification and segregation of cylinders/mobile cryogenic vessels at various stages of processing (e.g. "waiting checking", "awaiting filling", "quarantine", "certified", "rejected", "prepared deliveries").

The method used to achieve these various levels of segregation will depend on the nature, extent and complexity of the overall operation. Marked-out floor areas, partitions, barriers, signs, labels or other appropriate means could be used.

9. Empty cylinders/home cryogenic vessels after sorting or maintenance, and filled cylinders/home cryogenic vessels should be stored under cover, protected from adverse weather conditions. Filled cylinders/mobile cryogenic vessels should be stored in a manner that ensures that they will be delivered in a clean state, compatible with the environment in which they will be used.
10. Specific storage conditions should be provided as required by the Marketing Authorisation (e.g. for gas mixtures where phase separation occurs on freezing).

### Equipment

11. Equipment should be designed to ensure the correct gas is filled into the correct container. There should normally be no cross connections between pipelines carrying different gases. If cross connections are needed (e.g. filling equipment of mixtures), qualification should ensure that there is no risk of cross contamination between the different gases. In addition, the manifolds should be equipped with specific connections. These connections may be subject to international or national standards. The use of connections meeting different standards at the same filling site should be carefully controlled, as well as the use of adaptors needed in some situations to bypass the specific fill connection systems.
12. Tanks and tankers should be dedicated to a single and defined quality of gas. However, medicinal gases may be stored or transported in the same tanks, other containers used for intermediate storage, or tankers, as the same non-medicinal gas, provided that the quality of the latter is at least equal to the quality of the medicinal gas and that GMP standards are maintained. In such cases, quality risk management should be performed and documented.

13. A common system supplying gas to medicinal and non-medicinal gas manifolds is only acceptable if there is a validated method to prevent backflow from the non-medicinal gas line to the medicinal gas line.
14. Filling manifolds should be dedicated to a single medicinal gas or to a given mixture of medicinal gases. In exceptional cases, filling gases used for other medical purposes on manifolds dedicated to medicinal gases may be acceptable if justified and performed under control. In these cases, the quality of the non-medicinal gas should be at least equal to the required quality of the medicinal gas and GMP standards should be maintained. Filling should then be carried out by campaigns.
15. Repair and maintenance operations (including cleaning and purging) of equipment, should not adversely affect the quality of the medicinal gases. In particular, procedures should describe the measures to be taken after repair and maintenance operations involving breaches of the system's integrity. Specifically, it should be demonstrated that the equipment is free from any contamination that may adversely affect the quality of the finished product before releasing it for use. Records should be maintained.
16. A procedure should describe the measures to be taken when a tanker is back into medicinal gas service (after transporting non-medicinal gas in the conditions mentioned in section 12, or after a maintenance operation). This should include analytical testing.

## DOCUMENTATION

17. Data included in the records for each batch of cylinders / mobile cryogenic vessels must ensure that each filled cylinder is traceable to significant aspects of the relevant filling operations. As appropriate, the following should be entered:
  - a) the name of the product;
  - b) batch number;
  - c) the date and the time of the filling operations;
  - d) identification of the person(s) carrying out each significant step (e.g. line clearance, receipt, preparation before filling, filling etc.);
  - e) batch(es) reference(s) for the gas(es) used for the filling operation as referred to in section 22, including status;
  - f) equipment used (e.g. filling manifold);
  - g) quantity of cylinders/mobile cryogenic vessels before filling, including individual identification references and water capacity(ies);
  - h) pre-filling operations performed (see section 30);
  - i) key parameters that are needed to ensure correct fill at standard conditions;
  - j) results of appropriate checks to ensure the containers have been filled;
  - k) a sample of the batch label;
  - l) specification of the finished product and results of quality control tests (including reference to the calibration status of the test equipment);
  - m) quantity of rejected cylinders/mobile cryogenic vessels, with individual identification references and reasons for rejections;

- 
- n) details of any problems or unusual events, and signed authorisation for any deviation from filling instructions; and
  - o) certification statement by the Authorised Person, date and signature.
18. Records should be maintained for each batch of gas intended to be delivered into hospital tanks. These records should, as appropriate, include the following (items to be recorded may vary depending on local legislation):
- a) name of the product;
  - b) batch number;
  - c) identification reference for the tank (tanker) in which the batch is certified;
  - d) date and time of the filling operation;
  - e) identification of the person(s) carrying out the filling of the tank (tanker);
  - f) reference to the supplying tanker (tank), reference to the source gas as applicable;
  - g) relevant details concerning the filling operation;
  - h) specification of the finished product and results of quality control tests (including reference to the calibration status of the test equipment);
  - i) details of any problems or unusual events, and signed authorisation for any deviation from filling instructions; and
  - j) certification statement by the Authorised Person, date and signature.

## PRODUCTION

### Transfers and deliveries of cryogenic and liquefied gas

19. The transfers of cryogenic or liquefied gases from primary storage, including controls before transfers, should be in accordance with validated procedures designed to avoid any contamination. Transfer lines should be equipped with non-return valves or other suitable alternatives. Flexible connections, and coupling hoses and connectors should be flushed with the relevant gas before use.
20. The transfer hoses used to fill tanks and tankers should be equipped with product-specific connections. The use of adaptors allowing the connection of tanks and tankers not dedicated to the same gases should be adequately controlled.
21. Deliveries of gas may be added to tanks containing the same quality of gas provided that a sample is tested to ensure that the quality of the delivered gas is acceptable. This sample may be taken from the gas to be delivered or from the receiving tank after delivery.

*Note: See specific arrangements in section 42 for filling of tanks retained by customers at the customer's premises.*

### Filling and labelling of cylinders and mobile cryogenic vessels

22. Before filling cylinders and mobile cryogenic vessels, a batch (batches) of gas(es) should be determined, controlled according to specifications and approved for filling.

23. In the case of continuous processes as those mentioned in 'Principle', there should be adequate in-process controls to ensure that the gas complies with specifications.
24. Cylinders, mobile cryogenic vessels and valves should conform to appropriate technical specifications and any relevant requirements of the Marketing Authorisation. They should be dedicated to a single medicinal gas or to a given mixture of medicinal gases. Cylinders should be colour-coded according to relevant standards. They should preferably be fitted with minimum pressure retention valves with non-return mechanism in order to get adequate protection against contamination.
25. Cylinders, mobile cryogenic vessels and valves should be checked before first use in production, and should be properly maintained. Where medical devices have gone through a conformity assessment procedure<sup>1</sup>, the maintenance should address the medical device manufacturer's instructions.
26. Checks and maintenance operations should not affect the quality and the safety of the medicinal product. The water used for the hydrostatic pressure testing carried out on cylinders should be at least of drinking quality.
27. As part of the checks and maintenance operations, cylinders should be subject to an internal visual inspection before fitting the valve, to make sure they are not contaminated with water or other contaminants. This should be done:
  - when they are new and initially put into medicinal gas service;
  - following any hydrostatic statutory pressure test or equivalent test where the valve is removed;
  - whenever the valve is replaced.

After fitting, the valve should be kept closed to prevent any contamination from entering the cylinder. If there is any doubt about the internal condition of the cylinder, the valve should be removed and the cylinder internally inspected to ensure it has not been contaminated.

Maintenance and repair operations of cylinders, mobile cryogenic vessels and valves are the responsibility of the manufacturer of the medicinal product. If subcontracted, they should only be carried out by approved subcontractors, and contracts including technical agreements should be established. Subcontractors should be audited to ensure that appropriate standards are maintained.

28. There should be a system in place to ensure traceability of cylinders, mobile cryogenic vessels and valves.

---

<sup>1</sup> In the EU/EEA, these devices are marked «CE».

29. Checks to be performed before filling should include:
- a) in the case of cylinders, a check, carried out according to defined procedure, to ensure there is a positive residual pressure in each cylinder;
    - if the cylinder is fitted with a minimum pressure retention valve, when there is no signal indicating there is a positive residual pressure, the correct functioning of the valve should be checked, and if the valve is shown not to function properly the cylinder should be sent to maintenance,
    - if the cylinder is not fitted with a minimum pressure retention valve, when there is no positive residual pressure the cylinder should be put aside for additional measures, to make sure it is not contaminated with water or other contaminants; additional measures could consist of internal visual inspection followed by cleaning using a validated method;
  - b) a check to ensure that all previous batch labels have been removed;
  - c) a check that any damaged product labels have been removed and replaced;
  - d) a visual external inspection of each cylinder, mobile cryogenic vessel and valve for dents, arc burns, debris, other damage and contamination with oil or grease; cleaning should be done if necessary;
  - e) a check of each cylinder or mobile cryogenic vessel outlet connection to determine that it is the proper type for the particular gas involved;
  - f) a check of the date of the next test to be performed on the valve (in the case of valves that need to be periodically tested);
  - g) a check of the cylinders or mobile cryogenic vessels to ensure that any tests required by national or international regulations (e.g. hydrostatic pressure test or equivalent for cylinders) have been conducted and still is valid; and
  - h) a check to determine that each container is colour-coded as specified in the Marketing Authorisation (colour-coding of the relevant national / international standards).
30. A batch should be defined for filling operations.
31. Cylinders which have been returned for refilling should be prepared with care in order to minimise risks for contamination in line with the procedures defined in the Marketing Authorisation. These procedures, which should include evacuation and/or purging operations, should be validated.
- Note: For compressed gases a maximum theoretical impurity of 500 ppm v/v should be obtained for a filling pressure of 200 bar at 15°C (and equivalent for other filling pressures).*
32. Mobile cryogenic vessels that have been returned for refilling should be prepared with care in order to minimise the risks of contamination, in line with the procedures defined in the Marketing Authorisation. In particular, mobile vessels with no residual pressure should be prepared using a validated method.
33. There should be appropriate checks to ensure that each cylinder/mobile cryogenic vessel has been properly filled.
34. Each filled cylinder should be tested for leaks using an appropriate method, prior

---

to fitting the tamperevident seal or device (see section 36). The test method should not introduce any contaminant into the valve outlet and, if applicable, should be performed after any quality sample is taken.

35. After filling, cylinders valves should be fitted with covers to protect the outlets from contamination. Cylinders and mobile cryogenic vessels should be fitted with tamper-evident seals or devices.
36. Each cylinder or mobile cryogenic vessel should be labelled. The batch number and the expiry date may be on a separate label.
37. In the case of medicinal gases produced by mixing two or more different gases (in-line before filling or directly into the cylinders); the mixing process should be validated to ensure that the gases are properly mixed in every cylinder and that the mixture is homogeneous.

## QUALITY CONTROL

38. Each batch of medicinal gas (cylinders, mobile cryogenic vessels, hospital tanks) should be tested in accordance with the requirements of the Marketing Authorisation and certified.
39. Unless different provisions are required in the Marketing Authorisation, the sampling plan and the analysis to be performed should comply, in the case of cylinders with the following requirements.
  - a) In the case of a single medicinal gas filled via a multi-cylinder manifold, the gas from at least one cylinder from each manifold filling cycle should be tested for identity and assay each time the cylinders are changed on the manifold.
  - b) In the case of a single medicinal gas filled put into cylinders one at a time, the gas from at least one cylinder of each uninterrupted filling cycle should be tested for identity and assay. An example of an uninterrupted filling cycle is one shift's production using the same personnel, equipment, and batch of gas to be filled.
  - c) In the case of a medicinal gas produced by mixing two or more gases in a cylinder from the same manifold, the gas from every cylinder should be tested for assay and identity of each component gas. For excipients, if any, testing on identity could be performed on one cylinder per manifold filling cycle (or per uninterrupted filling cycle in case of cylinders filled one at a time). Fewer cylinders may be tested in case of validated automated filling system.
  - d) Premixed gases should follow the same principles as single gases when continuous in-line testing of the mixture to be filled is performed.

Premixed gases should follow the same principle as medicinal gases produced by mixing gases in the cylinders when there is no continuous in-line testing of the mixture to be filled.

Testing for water content should be performed unless otherwise justified.

Other sampling and testing procedures that provide at least equivalent level of quality assurance may be justified

40. Unless different provisions are required in the Marketing Authorisation, final testing on mobile cryogenic vessels should include a test for assay and identity



on each vessel. Testing by batches should only be carried out if it has been demonstrated that the critical attributes of the gas remaining in each vessel before refilling have been maintained.

41. Cryogenic vessels retained by customers (hospital tanks or home cryogenic vessels), which are refilled in place from dedicated tankers do not need to be sampled after filling, provided that a certificate of analysis on the contents of the tanker accompanies the delivery. However, it should be demonstrated that the specification of the gas in the vessels is maintained over the successive refillings.
42. Reference and retention samples are not required, unless otherwise specified.
43. On-going stability studies are not required in case initial stability studies have been replaced by bibliographic data.

## TRANSPORTATION OF PACKAGED GASES

44. Filled gas cylinders and home cryogenic vessels should be protected during transportation so that, in particular, they are delivered to customers in a clean state compatible with the environment in which they will be used.

## GLOSSARY

Definition of terms relating to manufacture of medicinal gases, which are not given in the glossary of the current PIC/S Guide to GMP, but which are used in this Annex are given below.

### **Active substance gas**

Any gas intended to be an active substance for a medicinal product.

### **Air separation**

Separation of atmospheric air into its constituent gases using fractional distillation at cryogenic temperatures.

### **Compressed gas**

Gas which, when packaged under pressure is entirely gaseous at all temperatures above  $-50^{\circ}$  C.

### **Container**

A container is a cryogenic vessel, (tank, tanker or other type of mobile cryogenic vessel), a cylinder, a cylinder bundle or any other package that is in direct contact with the gas.

### **Cryogenic gas**

Gas which liquefies at 1.013 bar at temperatures below  $-150^{\circ}$  C.

### **Cylinder**

Container usually cylindrical suited for compressed, liquefied or dissolved gas, fitted with a device to regulate the spontaneous outflow of gas at atmospheric pressure and room temperature.

### **Cylinder bundle**

An assembly of cylinders, which are fastened together interconnected by a manifold, transported and used as a unit.

### **Evacuate**

To remove the residual gas from a container / system to a pressure less than 1.013 bar using a vacuum system.

**Gas**

Any substance that is completely gaseous at 1.013 bar and +20<sup>0</sup> C or has a vapour pressure exceeding 3 bar at + 50<sup>0</sup> C.

**Home cryogenic vessel**

Mobile cryogenic vessel designed to hold liquid oxygen and dispense gaseous oxygen at patients' home.

**Hydrostatic pressure test**

Test performed as required by national or international regulations in order to ensure that pressure containers are able to withstand pressures up to the container's design pressure.

**Liquefied gas**

A gas which, when packaged for transport, is partially liquid (or solid) at a temperature above -50<sup>0</sup> C.

**Manifold**

Equipment or apparatus designed to enable one or more gas containers to be emptied and filled at the same time.

**Maximum theoretical residual impurity**

Gaseous impurity coming from a possible backflow that remains after the cylinders pre-treatment before filling. The calculation of the maximum theoretical residual impurity is only relevant for compressed gases and supposes that these gases act as perfect gases.

**Medicinal gas**

Any gas or mixture of gases classified as a medicinal product.

**Minimum pressure retention valve**

A cylinder valve, which maintains a positive pressure above atmospheric pressure in a gas cylinder after use, in order to prevent internal contamination of the cylinder.

**Mobile cryogenic vessel**

Mobile thermally insulated container designed to maintain the contents in a liquid state. In the Annex, this term does not include the tankers.

**Non-return valve**

Valve which permits flow in one direction only.

**Purge**

To remove the residual gas from a container / system by first pressurising and then venting the gas used for purging to 1.013 bar.

**Tank**

Static thermally insulated container designed for the storage of liquefied or cryogenic gas. They are also called "Fixed cryogenic vessels".

**Tanker**

In the context of the Annex, thermally insulated container fixed on a vehicle for the transport of liquefied or cryogenic gas.

**Valve**

Device for opening and closing containers.

**Vent**

To remove the residual gas from a container / system down to 1.013 bar, by opening the container / system to atmosphere.

## ANNEX 7

# MANUFACTURE OF HERBAL MEDICINAL PRODUCTS

## PRINCIPLE

Because of their often complex and variable nature, control of starting materials, storage and processing assume particular importance in the manufacture of herbal medicinal products.

The “starting material” in the manufacture of an herbal medicinal product<sup>1</sup> can be a medicinal plant, an herbal substance<sup>2</sup> or an herbal preparation<sup>1</sup>. The herbal substance should be of suitable quality and supporting data should be provided to the manufacturer of the herbal preparation/herbal medicinal product. Ensuring consistent quality of the herbal substance may require more detailed information on its agricultural production. The selection of seeds, cultivation and harvesting conditions represent important aspects of the quality of the herbal substance and can influence the consistency of the finished product. Recommendations on an appropriate quality assurance system for good agricultural and collection practice are provided in national or international guidance documents on Good Agricultural and Collection Practice for starting materials of herbal origin<sup>3</sup>.

This Annex applies to all herbal starting materials: medicinal plants, herbal substances or herbal preparations.

---

<sup>1</sup> Throughout the annex and unless otherwise specified, the term “herbal medicinal product / preparation” includes “traditional herbal medicinal product / preparation”.

<sup>2</sup> The terms herbal substance and herbal preparation are considered to be equivalent to the terms herbal drug and herbal drug preparation respectively.

<sup>3</sup> European Medicines Agency (EMA), World Health Organization (WHO) or equivalent.

**Table illustrating the application of Good Practices to the manufacture of herbal medicinal products <sup>4</sup>**

Activity	Good Agricultural and Collection Practice (GACP) #	Part II of the GMP Guide †	Part I of the GMP Guide †
Cultivation, collection and harvesting of plants, algae, fungi and lichens, and collection of exudates			
Cutting, and drying of plants, algae, fungi, lichens and exudates *			
Expression from plants and distillation**			
Comminution, processing of exudates, extraction from plants, fractionation, purification, concentration or fermentation of herbal substances			
Further processing into a dosage form including packaging as a medicinal product			

**Explanatory Notes**

†..The GMP classification of the herbal material is dependent upon the use made of it by the manufacturing authorisation holder. The material may be classified as an active substance, an intermediate or a finished product. It is the responsibility of the manufacturer of the medicinal product to ensure that the appropriate GMP classification is applied.

\* Manufacturers should ensure that these steps are carried out in accordance with the marketing authorisation / registration. For those initial steps that take place in the field, as justified in the marketing authorisation / registration, the national or international standards of Good Agricultural and Collection Practice for starting materials of herbal origin (GACP)# are applicable. GMP is applicable to further cutting and drying steps.

\*\* Regarding the expression from plants and distillation, if it is necessary for these activities to be an integral part of harvesting to maintain the quality of the product within the approved specifications, it is acceptable that they are performed in the field, provided that the cultivation is in compliance with national or international standards of GACP#. These circumstances should be regarded as exceptional and justified in the relevant marketing authorisation / registration documentation. For activities carried out in the field, appropriate documentation, control, and validation according to the GMP principles should be assured. Regulatory authorities may carry out GMP inspections of these activities in order to assess compliance.

<sup>4</sup> This table expands in detail the herbal section of Table 1 in Part II of the GMP Guide.

# EMA, WHO or equivalent

## PREMISES

### Storage areas

1. Herbal substances should be stored in separate areas. The storage area should be equipped in such a way as to give protection against the entry of insects or other animals, especially rodents. Effective measures should be taken to prevent the spread of any such animals and micro-organisms brought in with the crude substance, to prevent fermentation or mould growth and to prevent cross-contamination. Different enclosed areas should be used to quarantine incoming herbal substances and for the approved herbal substances.
2. The storage area should be well aerated and the containers should be located in such a way as to allow free circulation of air.
3. Special attention should be paid to the cleanliness and good maintenance of the storage areas particularly when dust is generated.
4. Storage of herbal substances and herbal preparations may require special conditions of humidity, temperature or light protection; these conditions should be provided and monitored.

### Production area

5. Specific provisions should be made during sampling, weighing, mixing and processing operations of herbal substances and herbal preparations whenever dust is generated, to facilitate cleaning and to avoid cross-contamination, as for example, dust extraction, dedicated premises, etc.

### Equipment

6. The equipment, filtering materials etc. used in the manufacturing process must be compatible with the extraction solvent, in order to prevent any release or undesirable absorption of substance that could affect the product.

## DOCUMENTATION

### Specifications for starting materials

7. Herbal medicinal product manufacturers must ensure that they use only herbal starting materials manufactured in accordance with GMP and the Marketing Authorisation dossier. Comprehensive documentation on audits of the herbal starting material suppliers carried out by, or on behalf of the herbal medicinal product manufacturer should be made available. Audit trails for the active substance are fundamental to the quality of the starting material. The manufacturer should verify, where appropriate, whether the suppliers of the herbal substance / preparation are in compliance with Good Agricultural and Collection Practice<sup>5</sup> and – if not – apply appropriate controls in line with Quality Risk Management (QRM).

---

<sup>5</sup> EMA, WHO or equivalent

8. To fulfil the specification requirements described in the basic requirements of the Guide (Chapter 4), documentation for herbal substances / preparations should include:
- the binomial scientific name of plant (genus, species, subspecies / variety and author (e.g. Linnaeus); other relevant information such as the cultivar name and the chemotype should also be provided, as appropriate;
  - details of the source of the plant (country or region of origin and where applicable, cultivation, time of harvesting, collection procedures, possible pesticides used, possible radioactive contamination, etc.);
  - which part(s) of the plant is/are used;
  - when a dried plant is used, the drying system should be specified;
  - a description of the herbal substance and its macro and microscopic examination;
  - suitable identification tests including, where appropriate, identification tests for constituents with known therapeutic activity, or markers. Specific distinctive tests are required where an herbal substance is liable to be adulterated / substituted. A reference authentic specimen should be available for identification purposes;
  - the water content for herbal substances, determined in accordance with the relevant Pharmacopoeia;
  - assay of constituents of known therapeutic activity or, where appropriate, of markers; the methods suitable to determine possible pesticide contamination and limits accepted in accordance with relevant Pharmacopoeia methods or, in absence of thereof, with an appropriate validated method, unless otherwise justified;
  - tests to determine fungal and/or microbial contamination, including aflatoxins, other mycotoxins, pest-infestations and limits accepted, as appropriate;
  - tests for toxic metals and for likely contaminants and adulterants, as appropriate;
  - tests for foreign materials, as appropriate;
  - any other additional test according to the relevant Pharmacopoeia general monograph on herbal substances or to the specific monograph of the herbal substance, as appropriate.

Any treatment used to reduce fungal/microbial contamination or other infestation should be documented. Specifications and procedures should be available and should include details of process, tests and limits for residues.

### **Processing instructions**

9. The processing instructions should describe the different operations carried out upon the herbal substance such as cleaning, drying, crushing and sifting, and include drying time and temperatures, and methods used to control cut size or particle size.
10. In particular, there should be written instructions and records, which ensure that each container of herbal substance is carefully examined to detect any adulteration/substitution or presence of foreign matter, such as metal or glass pieces, animal parts or excrement, stones, sand, etc., or rot and signs of decay.

11. The processing instructions should also describe security sieving or other methods of removing foreign materials and appropriate procedures for cleaning/selection of plant material before the storage of the approved herbal substance or before the start of manufacturing.
12. For the production of an herbal preparation, instructions should include details of solvent, time and temperatures of extraction, details of any concentration stages and methods used.

## **QUALITY CONTROL**

### **Sampling**

13. Due to the fact that medicinal plant/herbal substances are heterogeneous in nature, their sampling should be carried out with special care by personnel with particular expertise. Each batch should be identified by its own documentation.
14. A reference sample of the plant material is necessary, especially in those cases where the herbal substance is not described in the relevant Pharmacopoeia. Samples of unmilled plant material are required if powders are used.
15. Quality Control personnel should have particular expertise and experience in herbal substances, herbal preparations and/or herbal medicinal products in order to be able to carry out identification tests and recognise adulteration, the presence of fungal growth, infestations, non-uniformity within a delivery of crude material, etc.
16. The identity and quality of herbal substances, herbal preparations and herbal medicinal products should be determined in accordance with the relevant current national or international guidance on quality and specifications of herbal medicinal products and traditional herbal medicinal products and, where relevant, to specific pharmacopoeial monographs.

---

## ANNEX 8

# SAMPLING OF STARTING AND PACKAGING MATERIALS

## PRINCIPLE

Sampling is an important operation in which only a small fraction of a batch is taken. Valid conclusions on the whole cannot be based on tests which have been carried out on non-representative samples. Correct sampling is thus an essential part of a system of Quality Assurance.

Note: Sampling is dealt with in Chapter 6 of the Guide to GMP, items 6.11 to 6.14. These supplementary guidelines give additional guidance on the sampling of starting and packaging materials.

## PERSONNEL

1. Personnel who take samples should receive initial and on-going regular training in the disciplines relevant to correct sampling. This training should include:
  - sampling plans,
  - written sampling procedures,
  - the techniques and equipment for sampling,
  - the risks of cross-contamination,
  - the precautions to be taken with regard to unstable and/or sterile substances,
  - the importance of considering the visual appearance of materials, containers and labels,
  - the importance of recording any unexpected or unusual circumstances.

## STARTING MATERIALS

2. The identity of a complete batch of starting materials can normally only be ensured if individual samples are taken from all the containers and an identity test performed on each sample. It is permissible to sample only a proportion of the containers where a validated procedure has been established to ensure that no single container of starting material will be incorrectly identified on its label.
3. This validation should take account of at least the following aspects:
  - nature and status of the manufacturer and of the supplier and their understanding of the GMP requirements of the Pharmaceutical Industry;
  - the Quality Assurance system of the manufacturer of the starting material;
  - the manufacturing conditions under which the starting material is produced and controlled;
  - the nature of the starting material and the medicinal products in which it will



be used.

Under such arrangements, it is possible that a validated procedure exempting identity testing of each incoming container of starting material could be accepted for:

- starting materials coming from a single product manufacturer or plant;
- starting materials coming directly from a manufacturer or in the manufacturer's sealed container where there is a history of reliability and regular audits of the manufacturer's Quality Assurance system are conducted by the purchaser (the manufacturer of the medicinal products or by an officially accredited body.

It is improbable that a procedure could be satisfactorily validated for:

- starting materials supplied by intermediaries such as brokers where the source of manufacture is unknown or not audited;
- starting materials for use in parenteral products.

4. The quality of a batch of starting materials may be assessed by taking and testing a representative sample. The samples taken for identity testing could be used for this purpose. The number of samples taken for the preparation of a representative sample should be determined statistically and specified in a sampling plan. The number of individual samples which may be blended to form a composite sample should also be defined, taking into account the nature of the material, knowledge of the supplier and the homogeneity of the composite sample.

## **PACKAGING MATERIAL**

5. The sampling plan for packaging materials should take account of at least the following: the quantity received, the quality required, the nature of the material (e.g. primary packaging materials and/or printed packaging materials), the production methods, and the knowledge of Quality Assurance system of the packaging materials manufacturer based on audits. The number of samples taken should be determined statistically and specified in a sampling plan.

## ANNEX 9

# MANUFACTURE OF LIQUIDS, CREAMS AND OINTMENTS

## PRINCIPLE

Liquids, creams and ointments may be particularly susceptible to microbial and other contamination during manufacture. Therefore, special measures must be taken to prevent any contamination.

Note: The manufacture of liquids, creams and ointments must be done in accordance with the GMP described in the PIC Guide to GMP and with the other supplementary guidelines, where applicable. The present guidelines only stress points which are specific to this manufacture.

## PREMISES AND EQUIPMENT

1. The use of closed systems of processing and transfer is recommended in order to protect the product from contamination. Production areas where the products or open clean containers are exposed should normally be effectively ventilated with filtered air.
2. Tanks, containers, pipework and pumps should be designed and installed so that they may be readily cleaned and if necessary sanitised. In particular, equipment design should include a minimum of dead-legs or sites where residues can accumulate and promote microbial proliferation.
3. The use of glass apparatus should be avoided wherever possible. High quality stainless steel is often the material of choice for product contact parts.

## PRODUCTION

4. The chemical and microbiological quality of water used in production should be specified and monitored. Care should be taken in the maintenance of water systems in order to avoid the risk of microbial proliferation. After any chemical sanitization of the water systems, a validated flushing procedure should be followed to ensure that the sanitising agent has been effectively removed.
5. The quality of materials received in bulk tankers should be checked before they are transferred to bulk storage tanks.
6. Care should be taken when transferring materials via pipelines to ensure that they are delivered to their correct destination.
7. Materials likely to shed fibres or other contaminants, like cardboard or wooden pallets, should not enter the areas where products or clean containers are exposed.
8. Care should be taken to maintain the homogeneity of mixtures, suspensions, etc. during filling. Mixing and filling processes should be validated. Special care

should be taken at the beginning of a filling process, after stoppages and at the end of the process to ensure that homogeneity is maintained.

9. When the finished product is not immediately packaged, the maximum period of storage and the storage conditions should be specified and respected.

---

## **ANNEX 10**

# **MANUFACTURE OF PRESSURISED METERED DOSE AEROSOL PREPARATIONS FOR INHALATION**

## **PRINCIPLE**

Manufacture of pressurised aerosol products for inhalation with metering valves requires some special provisions arising from the particular nature of this pharmaceutical form. It should occur under conditions which minimise microbial and particulate contamination. Assurance of the quality of the valve components and, in the case of suspensions, of uniformity is also of particular importance.

Note: The manufacture of metered dose aerosols must be done in accordance with the GMP described in the PIC Guide to GMP and with the other supplementary guidelines, where applicable. The present guidelines only stress points which are specific to this manufacture.

## **GENERAL**

1. There are presently two common manufacturing and filling methods as follows:
  - a) Two-shot system (pressure filling). The active ingredient is suspended in a high boiling point propellant, the dose is filled into the container, the valve is crimped on and the lower boiling point propellant is injected through the valve stem to make up the finished product. The suspension of active ingredient in propellant is kept cool to reduce evaporation loss.
  - b) One-shot process (cold filling). The active ingredient is suspended in a mixture of propellants and held either under high pressure and/or at a low temperature. The suspension is then filled directly into the container in one shot.

## **PREMISES AND EQUIPMENT**

2. Manufacture and filling should be carried out as far as possible in a closed system.
3. Where products or clean components are exposed, the area should be fed with filtered air, should comply with the requirements of at least a Grade D environment and should be entered through airlocks.

## PRODUCTION AND QUALITY CONTROL

4. Metering valves for aerosols are a more complex engineering article than most pharmaceutical components. Specifications, sampling and testing should be appropriate for this situation. Auditing the Quality Assurance system of the valve manufacturer is of particular importance.
5. All fluids (e.g. liquid or gaseous propellants) should be filtered to remove particles greater than 0.2 micron. An additional filtration where possible immediately before filling is desirable.
6. Containers and valves should be cleaned using a validated procedure appropriate to the use of the product to ensure the absence of any contaminants such as fabrication aids (e.g. lubricants) or undue microbiological contaminants. After cleaning, valves should be kept in clean, closed containers and precautions taken not to introduce contamination during subsequent handling, e.g. taking samples. Containers should be provided to the filling line in a clean condition or cleaned on line immediately before filling.
7. Precautions should be taken to ensure uniformity of suspensions at the point of fill throughout the filling process.
8. When a two-shot filling process is used, it is necessary to ensure that both shots are of the correct weight in order to achieve the correct composition. For this purpose, 100% weight checking at each stage is often desirable.
9. Controls after filling should ensure the absence of undue leakage. Any leakage test should be performed in a way which avoids microbial contamination or residual moisture.

---

## ANNEX 11

# COMPUTERISED SYSTEMS

## PRINCIPLE

This annex applies to all forms of computerised systems used as part of a GMP regulated activities. A computerised system is a set of software and hardware components which together fulfil certain functionalities.

The application should be validated; IT infrastructure should be qualified.

Where a computerised system replaces a manual operation, there should be no resultant decrease in product quality, process control or quality assurance. There should be no increase in the overall risk of the process.

## GENERAL

### 1. *Risk Management*

Risk management should be applied throughout the lifecycle of the computerised system taking into account patient safety, data integrity and product quality. As part of a risk management system, decisions on the extent of validation and data integrity controls should be based on a justified and documented risk assessment of the computerised system.

### 2. *Personnel*

There should be close cooperation between all relevant personnel such as Process Owner, System Owner, Authorised Persons and IT. All personnel should have appropriate qualifications, level of access and defined responsibilities to carry out their assigned duties.

### 3. *Suppliers and Service Providers*

- 3.1 When third parties (e.g. suppliers, service providers) are used e.g. to provide, install, configure, integrate, validate, maintain (e.g. via remote access), modify or retain a computerised system or related service or for data processing, formal agreements must exist between the manufacturer and any third parties, and these agreements should include clear statements of the responsibilities of the third party. IT-departments should be considered analogous.
- 3.2 The competence and reliability of a supplier are key factors when selecting a product or service provider. The need for an audit should be based on a risk assessment.
- 3.3 Documentation supplied with commercial off-the-shelf products should be reviewed by regulated users to check that user requirements are fulfilled.
- 3.4 Quality system and audit information relating to suppliers or developers of software and implemented systems should be made available to inspectors on request.

## PROJECT PHASE

### 4. *Validation*

- 4.1 The validation documentation and reports should cover the relevant steps of the life cycle. Manufacturers should be able to justify their standards, protocols, acceptance criteria, procedures and records based on their risk assessment.
- 4.2 Validation documentation should include change control records (if applicable) and reports on any deviations observed during the validation process.
- 4.3 An up to date listing of all relevant systems and their GMP functionality (inventory) should be available.

For critical systems an up-to-date system description detailing the physical and logical arrangements, data flows and interfaces with other systems or processes, any hardware and software pre-requisites, and security measures should be available.

- 4.4 User Requirements Specifications should describe the required functions of the computerised system and be based on documented risk assessment and GMP impact. User requirements should be traceable throughout the life-cycle.
- 4.5 The regulated user should take all reasonable steps to ensure that the system has been developed in accordance with an appropriate quality management system. The supplier should be assessed appropriately.
- 4.6 For the validation of bespoke or customised computerised systems there should be a process in place that ensures the formal assessment and reporting of quality and performance measures for all the life-cycle stages of the system.
- 4.7 Evidence of appropriate test methods and test scenarios should be demonstrated. Particularly, system (process) parameter limits, data limits and error handling should be considered. Automated testing tools and test environments should have documented assessments for their adequacy.
- 4.8 If data are transferred to another data format or system, validation should include checks that data are not altered in value and/or meaning during this migration process.

## OPERATIONAL PHASE

### 5. *Data*

Computerised systems exchanging data electronically with other systems should include appropriate built-in checks for the correct and secure entry and processing of data, in order to minimize the risks.

### 6. *Accuracy Checks*

For critical data entered manually, there should be an additional check on the accuracy of the data. This check may be done by a second operator or by validated electronic means. The criticality and the potential consequences of erroneous or incorrectly entered data to a system should be covered by risk management.

---

**7. Data Storage**

- 7.1 Data should be secured by both physical and electronic means against damage. Stored data should be checked for accessibility, readability and accuracy. Access to data should be ensured throughout the retention period.
- 7.2 Regular back-ups of all relevant data should be done. Integrity and accuracy of backup data and the ability to restore the data should be checked during validation and monitored periodically.

**8. Printouts**

- 8.1 It should be possible to obtain clear printed copies of electronically stored data.
- 8.2 For records supporting batch release it should be possible to generate printouts indicating if any of the data has been changed since the original entry.

**9. Audit Trails**

Consideration should be given, based on a risk assessment, to building into the system the creation of a record of all GMP-relevant changes and deletions (a system generated "audit trail"). For change or deletion of GMP-relevant data the reason should be documented. Audit trails need to be available and convertible to a generally intelligible form and regularly reviewed.

**10. Change and Configuration Management**

Any changes to a computerised system including system configurations should only be made in a controlled manner in accordance with a defined procedure.

**11. Periodic Evaluation**

Computerised systems should be periodically evaluated to confirm that they remain in a valid state and are compliant with GMP. Such evaluations should include, where appropriate, the current range of functionality, deviation records, incidents, problems, upgrade history, performance, reliability, security and validation status reports.

**12. Security**

- 12.1 Physical and/or logical controls should be in place to restrict access to computerised system to authorised persons. Suitable methods of preventing unauthorised entry to the system may include the use of keys, pass cards, personal codes with passwords, biometrics, restricted access to computer equipment and data storage areas.
- 12.2 The extent of security controls depends on the criticality of the computerised system.
- 12.3 Creation, change, and cancellation of access authorisations should be recorded.
- 12.4 Management systems for data and for documents should be designed to record the identity of operators entering, changing, confirming or deleting data including date and time.



**13. Incident Management**

All incidents, not only system failures and data errors, should be reported and assessed. The root cause of a critical incident should be identified and should form the basis of corrective and preventive actions.

**14. Electronic Signature**

Electronic records may be signed electronically. Electronic signatures are expected to:

- a. have the same impact as hand-written signatures within the boundaries of the company,
- b. be permanently linked to their respective record,
- c. include the time and date that they were applied.

**15. Batch release**

When a computerised system is used for recording certification and batch release, the system should allow only Authorised Persons to certify the release of the batches and it should clearly identify and record the person releasing or certifying the batches. This should be performed using an electronic signature.

**16. Business Continuity**

For the availability of computerised systems supporting critical processes, provisions should be made to ensure continuity of support for those processes in the event of a system breakdown (e.g. a manual or alternative system). The time required to bring the alternative arrangements into use should be based on risk and appropriate for a particular system and the business process it supports. These arrangements should be adequately documented and tested.

**17. Archiving**

Data may be archived. This data should be checked for accessibility, readability and integrity. If relevant changes are to be made to the system (e.g. computer equipment or programs), then the ability to retrieve the data should be ensured and tested.

**GLOSSARY****Application**

Software installed on a defined platform/hardware providing specific functionality.

**Bespoke/Customised computerised system**

A computerised system individually designed to suit a specific business process.

**Commercial off-the-shelf software**

Software commercially available, whose fitness for use is demonstrated by a broad spectrum of users.

**IT Infrastructure**

The hardware and software such as networking software and operation systems, which makes it possible for the application to function.

**Life cycle**

All phases in the life of the system from initial requirements until retirement including

design, specification, programming, testing, installation, operation, and maintenance.

**Process owner**

The person responsible for the business process.

**System owner**

The person responsible for the availability, and maintenance of a computerised system and for the security of the data residing on that system.

**Third Party**

Parties not directly managed by the holder of the manufacturing and/or import authorisation.

---

## ANNEX 12

# USE OF IONISING RADIATION IN THE MANUFACTURE OF MEDICINAL PRODUCTS

## INTRODUCTION

Ionising radiation may be used during the manufacturing process for various purposes including the reduction of bioburden and the sterilisation of starting materials, packaging components or products and the treatment of blood products.

There are two types of irradiation process: Gamma irradiation from a radioactive source and high energy Electron irradiation (Beta radiation) from an accelerator.

Gamma irradiation: two different processing modes may be employed:

- (i) Batch mode: the products is arranged at fixed locations around the radiation source and cannot be loaded or unloaded while the radiation source is exposed.
- (ii) Continuous mode: an automatic system conveys the products into the radiation cell, past the exposed radiation source along a defined path and at an appropriate speed, and out of the cell.

Electron irradiation: the product is conveyed past a continuous or pulsed beam of high energy electrons (Beta radiation) which is scanned back and forth across the product pathway.

## RESPONSIBILITIES

1. Treatment by irradiation may be carried out by the pharmaceutical manufacturer or by an operator of a radiation facility under contract (a "contract manufacturer"), both of whom must hold an appropriate manufacturing authorisation.
2. The pharmaceutical manufacturer bears responsibility for the quality of the product including the attainment of the objective of irradiation. The contract operator of the radiation facility bears responsibility for ensuring that the dose of radiation required by the manufacturer is delivered to the irradiation container (i.e. the outermost container in which the products are irradiated).
3. The required dose including justified limits will be stated in the marketing authorisation for the product.

## DOSIMETRY

4. Dosimetry is defined as the measurement of the absorbed dose by the use of dosimeters. Both understanding and correct use of the technique is essential for the validation, commissioning and control of the process.
5. The calibration of each batch of routine dosimeters should be traceable to a national or international standard. The period of validity of the calibration should be stated, justified and adhered to.
6. The same instrument should normally be used to establish the calibration curve of the routine dosimeters and to measure the change in their absorbance after irradiation. If a different instrument is used, the absolute absorbance of each instrument should be established.
7. Depending on the type of dosimeter used, due account should be taken of possible causes of inaccuracy including the change in moisture content, change in temperature, time elapsed between irradiation and measurement, and the dose rate.
8. The wavelength of the instrument used to measure the change in absorbance of dosimeters and the instrument used to measure their thickness should be subject to regular checks of calibration at intervals established on the basis of stability, purpose and usage.

## VALIDATION OF THE PROCESS

9. Validation is the action of proving that the process, i.e. the delivery of the intended absorbed dose to the product, will achieve the expected results. The requirements for validation are given more fully in the note for guidance on "the use of ionising radiation in the manufacture of medicinal products".
10. Validation should include dose mapping to establish the distribution of absorbed dose within the irradiation container when packed with product in a defined configuration.
11. An irradiation process specification should include at least the following:
  - a) details of the packaging of the product;
  - b) the loading pattern(s) of product within the irradiation container. Particular care needs to be taken, when a mixture of products is allowed in the irradiation container, that there is no underdosing of dense product or shadowing of other products by dense product. Each mixed product arrangement must be specified and validated;
  - c) the loading pattern of irradiation containers around the source (batch mode) or the pathway through the cell (continuous mode);
  - d) maximum and minimum limits of absorbed dose to the product [and associated routine dosimetry];
  - e) maximum and minimum limits of absorbed dose to the irradiation container and associated routine dosimetry to monitor this absorbed dose;

- f) other process parameters, including dose rate, maximum time of exposure, number of exposures, etc.

When irradiation is supplied under contract at least parts (d) and (e) of the irradiation process specification should form part of that contract.

## **COMMISSIONING OF THE PLANT**

### **General**

12. Commissioning is the exercise of obtaining and documenting evidence that the irradiation plant will perform consistently within predetermined limits when operated according to the process specification. In the context of this annex, predetermined limits are the maximum and minimum doses designed to be absorbed by the irradiation container. It must not be possible for variations to occur in the operation of the plant which give a dose to the container outside these limits without the knowledge of the operator.
13. Commissioning should include the following elements:
- a. Design
  - b. Dose mapping;
  - c. Documentation;
  - d. Requirement for re-commissioning.

### **Gamma irradiators**

#### **Design**

14. The absorbed dose received by a particular part of an irradiation container at any specific point in the irradiator depends primarily on the following factors:
- a) the activity and geometry of the source;
  - b) the distance from source to container;
  - c) the duration of irradiation controlled by the timer setting or conveyor speed;
  - d) the composition and density of material, including other products, between the source and the particular part of the container.
15. The total absorbed dose will in addition depend on the path of containers through a continuous irradiator or the loading pattern in a batch irradiator, and on the number of exposure cycles.
16. For a continuous irradiator with a fixed path or a batch irradiator with a fixed loading pattern, and with a given source strength and type of product, the key plant parameter controlled by the operator is conveyor speed or timer setting.

#### **Dose Mapping**

17. For the dose mapping procedure, the irradiator should be filled with irradiation containers packed with dummy products or a representative product of uniform density. Dosimeters should be placed throughout a minimum of three loaded irradiation containers which are passed through the irradiator, surrounded by similar containers or dummy products. If the product is not uniformly packed,

18. The positioning of dosimeters will depend on the size of the irradiation container. For example, for containers up to 1 x 1 x 0.5 m, a three-dimensional 20 cm grid throughout the container including the outside surfaces might be suitable. If the expected positions of the minimum and maximum dose are known from a previous irradiator performance characterisation, some dosimeters could be removed from regions of average dose and replaced to form a 10 cm grid in the regions of extreme dose.
19. The results of this procedure will give minimum and maximum absorbed doses in the product and on the container surface for a given set of plant parameters, product density and loading pattern.
20. Ideally, reference dosimeters should be used for the dose mapping exercise because of their greater precision. Routine dosimeters are permissible but it is advisable to place reference dosimeters beside them at the expected positions of minimum and maximum dose and at the routine monitoring position in each of the replicate irradiation containers. The observed values of dose will have an associated random uncertainty which can be estimated from the variations in replicate measurements.
21. The minimum observed dose, as measured by the routine dosimeters, necessary to ensure that all irradiation containers receive the minimum required dose will be set in the knowledge of the random variability of the routine dosimeters used.
22. Irradiator parameters should be kept constant, monitored and recorded during dose mapping. The records, together with the dosimetry results and all other records generated, should be retained.

## **Electron Beam Irradiators**

### **Design**

23. The absorbed dose received by a particular portion of an irradiated product depends primarily on the following factors:
  - a) the characteristics of the beam, which are: electron energy, average beam current, scan width and scan uniformity;
  - b) the conveyor speed;
  - c) the product composition and density;
  - d) the composition, density and thickness of material between the output window and the particular portion of product;
  - e) the output window to container distance.
24. Key parameters controlled by the operator are the characteristics of the beam and the conveyor speed.

### **Dose Mapping**

25. For the dose mapping procedure, dosimeters should be placed between layers of homogeneous absorber sheets making up a dummy product, or between layers of representative products of uniform density, such that at least ten measurements can be made within the maximum range of the electrons. Reference should also be made to sections 18 to 21.

26. Irradiator parameters should be kept constant, monitored and recorded during dose mapping. The records, together with the dosimetry results and all other records generated, should be retained.

### **Re-commissioning**

27. Commissioning should be repeated if there is a change to the process or the irradiator which could affect the dose distribution to the irradiation container (e.g. change of source pencils). The extent to re-commissioning depends on the extent of the change in the irradiator or the load that has taken place. If in doubt, re-commission.

## **PREMISES**

28. Premises should be designed and operated to segregate irradiated from non-irradiated containers to avoid their cross-contamination. Where materials are handled within closed irradiation containers, it may not be necessary to segregate pharmaceutical from non-pharmaceutical materials, provided there is no risk of the former being contaminated by the latter.

Any possibility of contamination of the products by radionuclide from the source must be excluded.

## **PROCESSING**

29. Irradiation containers should be packed in accordance with the specified loading pattern(s) established during validation.
30. During the process, the radiation dose to the irradiation containers should be monitored using validated dosimetry procedures. The relationship between this dose and the dose absorbed by the product inside the container must have been established during process validation and plant commissioning.
31. Radiation indicators should be used as an aid to differentiating irradiated from non-irradiated containers. They should not be used as the sole means of differentiation or as an indication of satisfactory processing.
32. Processing of mixed loads of containers within the irradiation cell should only be done when it is known from commissioning trials or other evidence that the radiation dose received by individual containers remains within the limits specified.
33. When the required radiation dose is by design given during more than one exposure or passage through the plant, this should be with the agreement of the holder of the marketing authorisation and occur within a predetermined time period. Unplanned interruptions during irradiation should be notified to the holder of the marketing authorisation if this extends the irradiation process beyond a previously agreed period.
34. Non-irradiated products must be segregated from irradiated products at all times. Methods or doing this include the use of radiation indicators (31.) and appropriate design of premises (28.).

### **Gamma irradiators**

35. For continuous processing modes, dosimeters should be placed so that at least

36. For batch modes, at least two dosimeters should be exposed in positions related to the minimum dose position.
37. For continuous process modes, there should be a positive indication of the correct position of the source and an interlock between source position and conveyor movement. Conveyor speed should be monitored continuously and recorded.
38. For batch process modes source movement and exposure times for each batch should be monitored and recorded.
39. For a given desired dose, the timer setting or conveyor speed requires adjustment for source decay and source additions. The period of validity of the setting or speed should be recorded and adhered to.

### **Electron Beam Irradiators**

40. A dosimeter should be placed on every container.
41. There should be continuous recording of average beam current, electron energy, scan-width and conveyor speed. These variables, other than conveyor speed, need to be controlled within the defined limits established during commissioning since they are liable to instantaneous change.

### **DOCUMENTATION**

42. The numbers of containers received, irradiated and dispatched should be reconciled with each other and with the associated documentation. Any discrepancy should be reported and resolved.
43. The irradiation plant operator should certify in writing the range of doses received by each irradiated container within a batch or delivery.
44. Process and control records for each irradiation batch should be checked and signed by a nominated responsible person and retained. The method and place or retention should be agreed between the plant operator and the holder of the marketing authorisation.
45. The documentation associated with the validation and commissioning of the plant should be retained for one year after the expiry date or at least five years after the release of the last product processed by the plant, whichever is the longer.

### **MICROBIOLOGICAL MONITORING**

46. Microbiological monitoring is the responsibility of the pharmaceutical manufacturer. It may include environmental monitoring where product is manufactured and pre-irradiation monitoring of the product as specified in the marketing authorisation.



## ANNEX 13

# MANUFACTURE OF INVESTIGATIONAL MEDICINAL PRODUCTS

## INTRODUCTION

These guidelines lay down appropriate tools to address specific issues concerning investigational medicinal products with regard to good manufacturing practice. The tools are flexible to provide for changes as knowledge of the process increases and appropriate to the stage of development of the product.

An investigational medicinal product is a pharmaceutical form of an active substance or placebo being tested or used as a reference in a clinical trial, including a product with a marketing authorisation when used or assembled (formulated or packaged) in a way different from the authorised form, or when used for an unauthorised indication, or when used to gain further information about the authorised form.

Unless otherwise defined in national law, manufacturing is defined as total and partial manufacture, as well as the various processes of dividing up, packaging and labelling (including blinding).

Investigational medicinal products shall be manufactured by applying manufacturing practices which ensure the quality of such medicinal products in order to safeguard the safety of the subject and the reliability and robustness of clinical data generated in the clinical trial ("good manufacturing practice").

The good manufacturing practice requirements for investigational medicinal products are set out in these guidelines. Various other parts of the PIC/S GMP Guide provide useful guidance also and they should be considered.

Procedures need to be flexible to provide for changes as knowledge of the process increases and appropriate to the stage of development of the products.

In clinical trials there may be added risk to the subjects compared to patients treated with authorised medicinal products. The application of good manufacturing practice for the manufacture and import of investigational medicinal products is intended to ensure that subjects are not placed at undue risk, and that the results of clinical trials are unaffected by inadequate quality, safety or efficacy arising from unsatisfactory manufacture or import. (Note: the reference to 'Import' here and in other parts of this annex refers to importation activities into the relevant country, which should be performed in accordance with applicable national laws/requirements.) Equally, it is intended to ensure that there is consistency between batches of the same investigational medicinal product used in the same or different clinical trials and that changes during the development of an investigational medicinal product are adequately documented and justified.

The production of investigational medicinal products involves added complexity in comparison with authorised medicinal products by virtue of lack of fixed routines, variety of clinical trial designs and consequent packaging designs. Randomisation and blinding add to that complexity an increased risk of product cross-contamination and mix-up. Furthermore, there may be incomplete knowledge of the potency and toxicity of the product and a lack of full process validation. Moreover, authorised products may be used which have been re-packaged or modified in some way. These challenges require personnel with a thorough understanding of and training in the application of good manufacturing practice to investigational medicinal products. The increased complexity in manufacturing operations requires a highly effective quality system.

For manufacturers to be able to apply and comply with good manufacturing practice for investigational medicinal products, co-operation between manufacturers and sponsors of clinical trials is required. This co-operation should be described in a technical agreement between the sponsor and manufacturer.

## 1. SCOPE

These guidelines apply to manufacture or import of investigational medicinal products for human use.

Reconstitution of investigational medicinal products is not considered manufacturing, unless otherwise subject to national law, and therefore is not covered by this guideline.

The reconstitution is understood as the simple process of dissolving or dispersing the investigational medicinal product for administration of the product to a trial subject, or diluting or mixing the investigation medicinal product with some other substance(s) used as a vehicle for the purpose of administering it to a trial subject.

Reconstitution is not mixing several ingredients, including the active substance, together to produce the investigational medicinal product. An investigational medicinal product must exist before a process can be defined as reconstitution.

The process of reconstitution has to be undertaken as close in time as possible to administration and has to be defined in the clinical trial application dossier and document available at the clinical trial site.

While these guidelines do not apply to the activities listed below, PIC/S Participating Authorities should, in accordance with national law, make those processes subject to appropriate and proportionate requirements to ensure subject safety and reliability and robustness of the data generated in the clinical trial:

- Re-labelling or re-packaging, where those processes are carried out in hospitals, health centres or clinics, by pharmacists or other persons legally authorised in the country concerned to carry out such processes, and if the investigational medicinal products are intended to be used exclusively in hospitals, health centres or clinics taking part in the same clinical trial in the same country;

- The preparation of radiopharmaceuticals used as diagnostic investigational medicinal products where this process is carried out in hospitals, health centres or clinics, by pharmacists or other persons legally authorised in the country concerned to carry out such processes, and where the investigational medicinal products are intended to be used exclusively in hospitals, health centres or clinics taking part in the same clinical trial in the same country;
- The preparation of medicinal products for use as investigational medicinal products, where this process is carried out in hospitals, health centres or clinics legally authorised in the country concerned to carry out such process and where the investigational medicinal products are intended to be used exclusively in hospitals, health centres or clinics taking part in the same clinical trial in the same country.

## 2. PHARMACEUTICAL QUALITY SYSTEM

The pharmaceutical quality system which is designed, set-up and verified by the manufacturer should be described in written procedures, taking into account the guidance in Chapter 1 of Part 1 of the PIC/S GMP Guide, as applicable, to investigational medicinal products.

The product specifications and manufacturing instructions may be changed during development, but full control and traceability of the changes should be documented and maintained. Deviations from any predefined specifications and instructions should be registered, investigated and corrective and preventive action measures initiated as appropriate.

The selection, qualification, approval and maintenance of suppliers of starting materials, together with their purchase and acceptance, should be documented as part of the pharmaceutical quality system to ensure the integrity of the supply chain and protect against falsified products. The level of supervision should be proportionate to the risks posed by the individual materials, taking into account their source, manufacturing process, supply chain complexity and the final use to which the material is put in the investigational medicinal product. The supporting evidence for each supplier approval and material approval should be documented and maintained.

### 2.1. Product specification file

1. The product specification file brings together and contains all of the essential reference documents to ensure that investigational medicinal products are manufactured according to good manufacturing practice for investigational medicinal products and the clinical trial authorisation. The product specification file is one of the essential elements of the pharmaceutical quality system.
2. Applicable sections of the product specification file should be available at the start of manufacturing of the first batch of the investigational medicinal product for use in a clinical trial.

3. The product specification file should be continually updated as development of the product proceeds, ensuring appropriate traceability to the previous versions. It should include, or refer to, at least the following documents:
  - i. specifications and analytical methods for starting materials, packaging materials, intermediate product, bulk product and finished product;
  - ii. manufacturing methods;
  - iii. in-process testing and methods;
  - iv. approved label copy;
  - v. relevant clinical trial authorisations and amendments thereof, clinical trial protocol and randomisation codes, as appropriate;
  - vi. relevant technical agreements with contract givers and acceptors, as appropriate;
  - vii. stability plan and reports;
  - viii. details of plans and arrangements for reference and retention samples;
  - ix. storage and transport conditions; and
  - x. details of the supply chain including manufacturing, packaging, labelling and testing sites for the investigational medicinal products, preferably in the format of a comprehensive diagram.
4. This list of documents is neither exhaustive nor exclusive.
5. The contents of the product specification file will vary depending on the product and the stage of development.
6. Where different manufacturing steps are carried out at different locations under the responsibility of different Authorised Persons, it is acceptable to maintain separate files limited to information of relevance to the activities at the respective locations. The manufacturing site should have access to the necessary documentation of the product specification file, including changes, to enable the relevant activities to be performed.

### **3. PERSONNEL**

1. The guidance in Chapter 2 of Part 1 of the PIC/S GMP Guide should be taken into account, as appropriate, in relation to the manufacture of investigational medicinal products.
2. All personnel involved with the manufacture, import, storage or handling of investigational medicinal products should be appropriately trained in the requirements specific to these types of product.
3. Even where the number of staff involved in the manufacturing or import of investigational medicinal products is small, there should be, for each batch, separate people responsible for production and quality control.
4. The Authorised Person who certifies the finished batch of investigational medicinal products for use in the clinical trial should ensure that there are systems in place that meet the requirements of good manufacturing practice and should have a broad knowledge of pharmaceutical development, clinical trial processes and supply chain of the batch concerned.

## 4. PREMISES AND EQUIPMENT

1. The toxicity, potency or sensitising potential may not be fully understood for investigational medicinal products and this reinforces the need to minimise all risks of cross-contamination. The design of equipment and premises, inspection/test methods and acceptance limits to be used after cleaning should reflect the nature of these risks and take account of the quality risk management principles detailed in Chapters 3 and 5 of Part 1 of the PIC/S GMP Guide.
2. Consideration should be given to campaign manufacturing, where appropriate. Account should be taken of the solubility of the product in decisions about the choice of cleaning solvent.
3. A quality risk management process, which includes a potency and toxicological evaluation, should be used to assess and control the cross-contamination risks presented by the investigational medicinal products manufactured. Factors that should be taken into account include:
  - i. facility/equipment design and use;
  - ii. personnel and material flow;
  - iii. microbiological controls;
  - iv. physio-chemical characteristics of the active substance;
  - v. process characteristics;
  - vi. cleaning processes;
  - vii. analytical capabilities relative to the relevant limits established from the evaluation of the investigational medicinal products.
4. Premises and equipment are expected to be qualified in accordance with Annex 15 to the PIC/S GMP Guide.

## 5. DOCUMENTATION

1. Documentation should be generated and controlled in line with the principles detailed in the PIC/S GMP Guide, Part I, Chapter 4. The retention period for instructions and records required to demonstrate compliance with good manufacturing practice should be defined according to the type of document while complying with any relevant national laws. The documentation shall be consistent with the Product Specification File. Documents which are part of the Product Specification File shall be retained for the period of at least 5 years, unless otherwise specified in relevant national laws.
2. The sponsor may have specific responsibilities for document retention of the clinical trial master file according to relevant national laws but unless otherwise specified in national laws, should retain such documentation for at least 25 years after the end of the trial. If the sponsor and the manufacturer are not the same entity, the sponsor has to make appropriate arrangements with the manufacturer to fulfil the sponsor's requirement to retain the clinical trial master file. Arrangement for retention of such documents and the type of documents to be retained should be defined in an agreement between the sponsor and manufacturer.

## 5.1 Specification and instructions

1. Specifications for starting materials, immediate packaging materials, intermediate products, bulk products and finished products, manufacturing formulae and processing and packing instructions should be as comprehensive as possible given the current state of knowledge. They should be re-assessed during development and updated as necessary. Each new version should take into account the latest data, current technology used, regulatory and pharmacopoeial developments and should allow traceability to the previous document. Any changes should be carried out according to a written procedure which should address any implications for product quality such as stability and bioequivalence. The approval process for instructions and changes thereof shall include responsible personnel at the manufacturing site.
2. Rationales for changes should be recorded and the consequences of a change on product quality and on any on-going clinical trials should be investigated and fully documented.

## 5.2 Order

The manufacturer should retain the order for the investigational medicinal product as part of the batch documentation. The order should request the processing and/or packaging of a certain number of units and/or their distribution and be given by or on behalf of the sponsor to the manufacturer. The order should be in writing, though it may be transmitted by electronic means, and be precise enough to avoid any ambiguity. It should be formally authorised by the sponsor or his representative and refer to the product specification file and the relevant clinical trial protocol as appropriate.

## 5.3 Manufacturing formulae and processing instructions

1. For every manufacturing operation or supply there should be clear and adequate written instructions and written records which are prepared using the specific clinical study information detailed in the product specification file. Records are particularly important for the preparation of the final version of the documents to be used in routine manufacture once the marketing authorisation is granted.
2. The relevant information in the product specification file should be used to draft the detailed written instructions on processing, packaging, quality control testing, and storage, including storage conditions.

## 5.4 Packaging instructions

1. Investigational medicinal products are normally packed in an individual way for each subject included in the clinical trial. The number of units to be packaged should be specified prior to the start of the packaging operations, including units necessary for carrying out quality control and for any retention samples to be kept. Sufficient reconciliations should take place to ensure that the correct quantity of each product required has been accounted for at each stage of processing.
2. Procedures should describe the specification, generation, testing, security, distribution, handling and retention of any randomisation code used for packaging investigational medicinal products as well as code-break

## 5.5 Batch records

1. Batch records should be kept in sufficient detail for the sequence of operations to be accurately determined. These records should contain any relevant remarks which justify procedures used and any changes made, enhance knowledge of the product, develop the manufacturing operations and document deviations from predefined requirements.
2. Batch manufacturing records should be retained by the manufacturer for at least 5 years after the completion or formal discontinuation of the last clinical trial in which the batch was used, or in accordance with the requirements of national laws.

## 6. PRODUCTION

### 6.1. Packaging materials

Specifications and quality control checks should include measures to guard against unintentional unblinding due to changes in appearance between different batches of packaging materials.

### 6.2. Manufacturing operations

1. During development critical parameters should be identified and in-process controls primarily used to control the process. Provisional production parameters and in-process controls may be deduced from prior experience, including that gained from earlier development work. Careful consideration by key personnel is called for in order to formulate the necessary instructions and to adapt them continually to the experience gained in production. Parameters identified and controlled should be justifiable based on knowledge available at the time.
2. The manufacturing process is not required to be validated to the extent necessary for routine production but shall be validated in its entirety, as far as is appropriate, taking into account the stage of product development. The validation should be documented in accordance with the requirements detailed in Annex 15 of the PIC/S GMP Guide. The manufacturer shall identify the process steps that safeguard the safety of the subject and the reliability and robustness of the clinical trial data generated in the clinical study.
3. To avoid cross-contamination, written cleaning procedures and analytical methods to verify the cleaning process should be available.
4. For sterile products, the validation of controls and processes related to assurance of sterility should be of the same standards as for authorised medicinal products and take account of the principles for the manufacture of sterile medicinal products as detailed in Annex 1 to the PIC/S GMP Guide. Likewise, when required, virus inactivation/removal and removal of other impurities of biological origin should be demonstrated, to assure the safety of biotechnologically derived and biological products by following the scientific principles and techniques defined in the available guidance in this area.
5. Validation of aseptic processes presents special problems where the batch size is small; in these cases, the number of units filled may be the maximum

number filled in production. If practicable, and otherwise consistent with simulating the process, a larger number of units should be filled with media to provide greater confidence in the results obtained. Filling and sealing is often a manual or semi-automated operation presenting great challenges to sterility, so enhanced attention should be given to operator training and validating the aseptic technique of individual operators.

### 6.3. Modification of comparator products

1. If a product is modified, data should be available (e.g. stability, comparative dissolution or bioavailability) to demonstrate that these changes do not significantly alter the original quality characteristics of the product.
2. The expiry date stated for the comparator product in its original packaging might not be applicable to the product where it has been repackaged in a different container that may not offer equivalent protection, or be compatible with the product. A suitable retest date, taking into account the nature of the product, the characteristics of the container and the storage conditions to which the product may be subjected, should be determined by or on behalf of the sponsor. Such a date should be justified and must not be later than the expiry date of the original package. There should be compatibility of expiry dating and clinical trial duration.
3. A reference sample of comparator product, which has been repackaged or over encapsulated for blinding purposes, should be taken at a point representative of the additional processing and retained, as the additional processing step could have an impact on stability or be needed for identification purposes in the event of a quality defect investigation, which would not be covered by the commercial retained sample.

### 6.4 Blinding operations

1. Where products are blinded, systems should be in place to ensure that the blind is achieved and maintained while allowing for identification of "blinded" products, when necessary, including batch numbers of the products before the blinding operation. Rapid identification of product should also be possible in an emergency. Where the manufacturer has been delegated the responsibility for generation of randomisation codes, the manufacturer should enable that unblinding information is available to the appropriate responsible investigator site personnel before investigational medicinal products are supplied.
2. Where products are blinded, the expiry date assigned to all products should be stated at the expiry of the shortest dated product so that the blinding is maintained.

### 6.5 Packaging

1. During packaging of investigational medicinal products, it may be necessary to handle different products on the same packaging line at the same time. The risk of product unintentional mixing (mix-ups) must be minimised by using appropriate procedures and/or specialised equipment as appropriate and relevant staff training. Documentation must be sufficient to demonstrate that appropriate segregation has been maintained during any packaging operations.

2. Packaging and labelling of investigational medicinal products are likely to be



more complex and more liable to errors which are also harder to detect than for authorised medicinal products, particularly when blinded products with similar appearance are used. Precautions against mislabelling such as reconciliation, line clearance, in-process control checks by appropriately trained staff should accordingly be intensified.

3. The packaging must ensure that the investigational medicinal product remains in good condition during transport and storage at intermediate destinations. Any opening or tampering of the outer packaging during transport should be readily discernible.
4. Re-packaging operations may be performed by authorised personnel at a hospital, health centre or clinic that meet the requirements of relevant national laws or requirements (i.e. in healthcare establishments that are not otherwise subject to good manufacturing practices).

## 6.6 Labelling

1. The labelling of investigational medicinal products shall comply with the requirements of relevant national laws or requirements, and where no such requirements exist, it should address at least the following elements, unless their absence can be justified, e.g. use of a centralised electronic randomisation system:
  - i. name, address and telephone number of the sponsor, contract research organisation or investigator (the main contact for information on the product, clinical trial and emergency unblinding);
  - ii. the name/identifier and strength/potency, and in the case of blinded trials, all product labelling should indicate “placebo/comparator or [name/identifier] + [strength/potency]”
  - iii. pharmaceutical dosage form, route of administration, and quantity of dosage units;
  - iv. the batch and/or code number to identify the contents and packaging operation;
  - v. a trial reference code allowing identification of the trial, site, investigator and sponsor if not given elsewhere;
  - vi. the trial subject identification number/treatment number and where relevant, the visit number;
  - vii. the name of the investigator (if not included in (i) or (v));
  - viii. directions for use (reference may be made to a leaflet or other explanatory document intended for the trial subject or person administering the product);
  - ix. “For clinical trial use only” or similar wording;
  - x. the storage conditions;
  - xi. period of use (use-by date, expiry date or re-test date as applicable), in month/year format and in a manner that avoids any ambiguity; and
  - xii. “keep out of reach of children” except when the product is for use in trials where the product is not taken home by subjects.
2. The information which shall appear on the labelling should comply with any relevant national laws or requirements. The labelling operation should be performed at an authorised manufacturing site in accordance with relevant national laws or requirements.

3. If it becomes necessary to change the expiry date, an additional label should be affixed to the investigational medicinal product. This additional label should state the new expiry date and repeat the batch number and clinical trial reference number. It may be superimposed on the old expiry date, but for quality control reasons, not on the original batch number.
4. The re-labelling operation should be performed by appropriately trained staff in accordance with good manufacturing practice principles and specific standard operating procedures and should be checked by a second person. This additional labelling should be properly documented in the batch records. To avoid mistakes the additional labelling activity should be carried out in an area which is partitioned or separated from other activities. A line clearance at the start and end of activity should be carried out and label reconciliation performed. Any discrepancies observed during reconciliation should be investigated and accounted for before release.
5. The re-labelling operation may be performed by authorised personnel at a hospital, health centre or clinic that meet the requirements of relevant national laws or requirements (i.e. in healthcare establishments that are not subject to good manufacturing practices).

## 7. QUALITY CONTROL

1. The manufacturer should establish and maintain a quality control system placed under the authority of a person who has the requisite qualifications and is independent of production.
2. As processes may not be standardised or fully validated, testing takes on more importance in ensuring that each batch meets the approved specification at the time of testing.
3. Quality control of the investigational medicinal product, including that of the comparator product, should be performed in accordance with the information submitted in the application for the clinical trial, as authorised by the relevant country.
4. Verification of the effectiveness of blinding should be performed and recorded.
5. Retention periods for samples of investigational medicinal products should comply with the relevant national laws or other requirements.
6. Samples are retained to fulfil two purposes: firstly, to provide a sample for future analytical testing, and secondly, to provide a specimen of the finished investigational medicinal product which may be used in the investigation of a product quality defect.
7. Samples may therefore fall into two categories:
  - Reference sample: a sample of a batch of starting material, packaging material or finished product which is stored for the purpose of being analysed should the need arise. Where stability permits, reference samples from critical intermediate stages, e.g. those requiring analytical testing and release, or intermediates which are transported outside of the manufacturer's control, should be kept.
  - Retention sample: a sample of a fully packaged unit from a batch of

finished product. It is stored for identification purposes. For example, presentation, packaging, labelling, package leaflet, batch number, expiry date should the need arise during the shelf life of the batch concerned.

8. There may be exceptional circumstances where this requirement can be met without retention of duplicate samples, e.g. where small amounts of a batch are packaged for different markets or in the production of very expensive medicinal products.
9. For retention samples it is acceptable to store information related to the final packaging as written, photographic or electronic records, if such records provide sufficient information, e.g. examples of packaging, labelling and any accompanying documentation to permit investigations associated with the use of the product. In case of electronic records, the system should comply with the requirements of Annex 11 of the PIC/S GMP Guide.
10. Where reference samples and retention samples are presented identically, i.e. as fully packaged units, the samples may be regarded as interchangeable.
11. Samples are not expected of an investigational medicinal product which is an unblinded comparator in its original packaging and sourced from the authorised supply chain in the country in which the clinical trial is intended to occur or of a product which holds a marketing authorisation granted by the national competent authority of the country in which the clinical trial occurs. (Note: In the EU, it might be the European Commission that has granted the marketing authorisation.)
12. The storage location of samples should be defined in a technical agreement between the sponsor and the manufacturer(s) and should allow timely access by the competent authorities.
13. Reference samples of finished product should be stored under defined storage conditions in the country in which the manufacturer is located or in another country where appropriate arrangements have been made between (or on behalf of) the two countries to ensure that the manufacturer of the investigational medicinal product applies standards of good manufacturing practice at least equivalent to those laid down by the PIC/S GMP Guide. In exceptional circumstances, the reference samples of the finished product may be stored by the manufacturer in another country, in which case this should be justified and documented in a technical agreement between the sponsor, the manufacturer and the storage site.
14. The reference sample should be of sufficient size to perform, on at least two occasions, all critical quality attribute tests as defined in the investigational medicinal product dossier authorised by the relevant country. Any exception to this should be justified to, and agreed with, the national competent authority.

## **8. RELEASE OF BATCHES**

1. Release of investigational medicinal products should not occur until after the Authorised Person has certified that the relevant requirements have been met. The Authorised Person should take into account the elements listed below, as appropriate.
2. The scope of the certification can be limited to assuring that the products are in accordance with the authorisation of the clinical trial and any subsequent

processing carried out by the manufacturer for the purpose of blinding, trial-specific packaging and labelling.

3. The information in the product specification file should form the basis for assessment of the suitability for certification and release of a particular batch by the Authorised Person and should therefore be accessible to him or her.
4. Assessment by the Authorised Person of each batch for certification prior to release should take account of the principles detailed in Annex 16 of the PIC/S GMP Guide and may include as appropriate;
  - i. batch records, including control reports, in-process test reports and release reports demonstrating compliance with the product specification file, the order, protocol and randomisation code. These records should include all deviations or planned changes, and any consequent additional checks and tests, and should be completed and endorsed by the staff authorised to do so according to the quality system;
  - ii. production conditions;
  - iii. cleaning records;
  - iv. the qualification status of facilities, validation status of processes and methods;
  - v. examination of finished packs;
  - vi. the results of any analyses or tests performed after importation, where relevant;
  - vii. stability plan and reports;
  - viii. the source and verification of conditions of storage and shipment;
  - ix. audit reports concerning the quality system of the manufacturer;
  - x. documents certifying that the manufacturer is authorised to manufacture investigational medicinal product for export (as applicable under national law); by the appropriate authorities in the relevant country;
  - xi. where relevant, regulatory requirements for marketing authorisation, good manufacturing practice standards applicable and any official verification of compliance with good manufacturing practice;
  - xii. verification of the supply chain including manufacturing, packaging, labelling and testing sites for the investigational medicinal products; and
  - xiii. all factors of which the Authorised Person is aware that are relevant to the quality of the batch.
5. The relevance of the above elements is affected by the country of origin of the product, the manufacturer, the status of the product, i.e. with or without a marketing authorisation granted by the relevant competent authority, and the phase of development of the product.
6. Where investigational medicinal products are produced and packaged at different sites under the supervision of different Authorised Persons, sharing of responsibilities amongst the Authorised Persons in relation to compliance of a batch must be defined in a document formally agreed by all parties.
7. Where required to support certification, the Authorised Person has to ensure that the investigational medicinal product has been stored and transported under conditions that maintain product quality and supply chain security.

Relevant situations may include short expiry date products released prior to final Authorised Person certification, or where return of investigational medicinal products to an authorised manufacturer for re-labelling and re-packaging remains a possibility.

8. Where the manufacturer is delegated by the sponsor to perform the regulatory release in addition to certification by the Authorised Person, the arrangements should be defined in an agreement between the sponsor and the manufacturer. Relevant clinical trial authorisation and amendment information should be available for reference in the product specification file and the manufacturer should ensure the necessary clinical trial authorisations are in place and prior to shipping product for use in the trial.
9. After certification by the Authorised Person, the investigational medicinal product should be stored and transported under conditions that maintain product quality and supply chain security.
10. The Authorised Person is not required to certify re-packaging (section 6.5) or re-labelling (section 6.6) performed by authorised personnel at a hospital, health centre or clinic that meet the requirements of relevant national laws or requirements.

## **9. OUTSOURCED OPERATIONS**

Activities which are outsourced should be defined, agreed and controlled by written contracts between the contract giver and the party to whom the operations are outsourced in accordance with the principles detailed in Part I, Chapter 7 of the PIC/S GMP Guide.

## **10. COMPLAINTS**

1. There should be written procedures describing the actions to be taken upon receipt of a complaint at the manufacturing, storage or importation site. All complaints should be documented and assessed to establish if they represent a potential quality defect or other issue. The procedures should ensure that the sponsor is able to assess the complaints to determine if they justify the reporting of a serious breach to the relevant competent authority.
2. The investigation of quality defect should be performed in accordance with the principles detailed in Part I, Chapter 8 of the PIC/S GMP Guide.
3. The conclusions of the investigation should be discussed between the manufacturer and the sponsor, if different, in a timely manner. This should involve the Authorised Person and those responsible for the relevant clinical trial in order to assess any potential impact on the trial, product development and on subjects.

## **11. RECALLS AND RETURNS**

### **11.1 Recalls**

1. Procedures for retrieving investigational medicinal products and documenting such retrievals should be in line with relevant national laws and guidelines, and be agreed by the sponsor in cooperation with the manufacturer, where different. The manufacturer, investigator and the sponsor's representative need to understand their obligations under the retrieval procedure. The

procedures for retrieval of investigational medicinal products should be in accordance with the principles detailed in Chapter 8 of the PIC/S GMP Guide.

2. To facilitate recall, a detailed inventory of the shipments made by the manufacturer should be maintained.

## 11.2 Returns

Returned investigational medicinal products should be clearly identified and stored in an appropriately controlled, dedicated area. Inventory records of returned products should be kept.

## 11.3 Destruction

1. The manufacturer or sponsor's representative should destroy investigational medicinal products only with prior written authorisation by the sponsor. The arrangements for destruction of investigational medicinal products have to be described in the protocol. Any arrangement between sponsor and manufacturer in this regard should be defined in their technical agreement.
2. Destruction of unused investigational medicinal products should be carried out only after reconciliation of delivered, used and recovered products and after investigation and satisfactory explanation of any discrepancies upon which the reconciliation has been accepted.
3. Records of destruction operations should be retained, including a dated certificate of destruction or a receipt for destruction to the sponsor. These documents should clearly identify or allow traceability to the batches and/or patient numbers involved and the actual quantities destroyed.

## GLOSSARY TO ANNEX 13

### Blinding

A procedure in which one or more parties to the trial are kept unaware of the treatment assignment(s). Single-blinding usually refers to the subject(s) being unaware, and double-blinding usually refers to the subject(s), investigator(s), monitor, and, in some cases, data analyst(s) being unaware of the treatment assignment(s). In relation to an investigational medicinal product, blinding shall mean the deliberate disguising of the identity of the product in accordance with the instructions of the sponsor. Unblinding shall mean the disclosure of the identity of blinded products.

### Campaign manufacturing

Manufacturing a series of batches of the same product in sequence in a given period of time followed by an appropriate (validated) cleaning procedure.

### Clinical trial

Any investigation in human subjects intended to discover or verify the clinical, pharmacological and/or other pharmacodynamic effects of an investigational product(s) and/or to identify any adverse reactions to an investigational product(s), and/or to study absorption, distribution, metabolism, and excretion of one or more investigational medicinal product(s) with the object of ascertaining its/their safety and/or efficacy.

### Comparator product

An investigational medicinal product used as a reference, including as a placebo, in a clinical trial.

**Expiry date**

The date placed on the container/labels of an investigational medicinal products designating the time during which the investigational medicinal products is expected to remain within established shelf life specifications if stored under defined conditions, and after which it should not be used.

**Investigational medicinal product**

A pharmaceutical form of an active substance or placebo being tested or used as a reference in a clinical trial, including a product with a marketing authorisation when used or assembled (formulated or packaged) in a way different from the authorised form, or when used for an unauthorised indication, or when used to gain further information about the authorised form.

**Investigator**

A person responsible for the conduct of the clinical trial at a trial site. If a trial is conducted by a team of individuals at a trial site, the investigator is the responsible leader of the team and may be called the principal investigator.

**Manufacturer/importer of Investigational Medicinal Products**

Any holder of the authorisation to manufacture/import.

**Manufacture**

All operations of purchase of materials and products, production, quality control, release, storage, distribution of investigational medicinal products and the related controls. Note that the word 'preparation' as used in this Annex should be taken as synonymous with the word 'manufacture'.

**Order**

The order should request the processing and/or packaging of a certain number of units and/or their shipment and be given by or on behalf of the sponsor to the manufacturer.

**Preparation**

See 'Manufacture' above.

**Product Specification File**

A reference file containing, or referring to files containing, all the information necessary to draft the detailed written instructions on processing, packaging, quality control testing, batch release and shipping of an investigational medicinal product.

**Randomisation**

The process of assigning trial subjects to treatment or control groups using an element of chance to determine the assignments in order to reduce bias.

**Randomisation Code**

A listing in which the treatment assigned to each subject from the randomisation process is identified.

**Retest date**

The date when a material should be re-examined to ensure that it is still suitable for use.

**Regulatory Release**

The verification of batch certification and that the clinical trial site is trained, qualified and has the necessary approvals, thus is ready to receive investigational medicinal product.

**Shipping**

The operation of packaging for shipment and sending of ordered medicinal products for clinical trials.

**Sponsor**

An individual, company, institution or organisation which takes responsibility for the initiation, management and/or financing of a clinical trial.



## ANNEX 14

# MANUFACTURE OF MEDICINAL PRODUCTS DERIVED FROM HUMAN BLOOD OR PLASMA

## CONTENTS

### Glossary

1. Scope
2. Principles
3. Quality Management
4. Traceability and Post Collection Measures
5. Premises and equipment
6. Manufacturing
7. Quality Control
8. Release of intermediate and finished products
9. Retention of plasma pool samples
10. Disposal of waste

## GLOSSARY

### **Blood**

Blood<sup>1</sup> means whole blood collected from a single (human) donor and processed either for transfusion or for further manufacturing.

### **Blood component**

A blood component<sup>2</sup> means a therapeutic constituent of blood (red cells, white cells, platelets and plasma) that can be prepared by various methods, using conventional blood bank methodology (e.g. centrifugation, filtration, freezing). This does not include haematopoietic progenitor cells.

### **Blood establishment**

A blood establishment<sup>3</sup> is any structure or body that is responsible for any aspect of the collection and testing of human blood and blood components, whatever their intended purpose, and their processing, storage and distribution when intended for transfusion.

### **Blood products**

A blood product<sup>4</sup> means any therapeutic product derived from human blood or plasma.

### **Fractionation, fractionation plant**

Fractionation is the manufacturing process in a plant (fractionation plant) during which plasma components are separated/purified by various physical and chemical methods such as e.g. precipitation, chromatography.

---

<sup>1</sup> For EU/EEA as referred to in Directive 2002/98/EC (Art. 3a)

<sup>2</sup> For EU/EEA as referred to in Directive 2002/98/EC (Art. 3b)

<sup>3</sup> For EU/EEA as referred to in Directive 2002/98/EC (Art. 3e)

<sup>4</sup> For EU/EEA as referred to in Directive 2002/98/EC (Art. 3c)

### **Good Practice guidelines**

Good practice guidelines give interpretation on the national standards and specifications defined for quality systems in blood establishments<sup>5</sup>.

### **Medicinal products derived from human blood or human plasma**

Medicinal products derived from human blood or human plasma<sup>6</sup> are medicinal products based on blood constituents which are prepared industrially by public or private establishments.

### **Plasma for fractionation**

Plasma for fractionation is the liquid part of human blood remaining after separation of the cellular elements from blood collected in a container containing an anticoagulant, or separated by continuous filtration or centrifugation of anti-coagulated blood in an apheresis procedure; it is intended for the manufacture of plasma derived medicinal products, in particular albumin, coagulation factors and immunoglobulins of human origin and specified in the European (or other relevant) Pharmacopoeia (Ph. Eur.) monograph "Human Plasma for fractionation" (0853).

### **Plasma Master File (PMF)**

A Plasma Master File<sup>7</sup> is a stand-alone document, which is separate from the dossier for marketing authorisation. It provides all relevant detailed information on the characteristics of the entire human plasma used as a starting material and/or a raw material for the manufacture of sub/intermediate fractions, constituents of the excipients and active substances, which are part of plasma, derived medicinal products or medical devices.

### **Processing**

Processing<sup>8</sup> means any step in the preparation of blood component that is carried out between the collection of blood and the issuing of a blood component, e.g. separation and freezing of blood components. In this Annex, processing in addition refers to those operations performed at the blood establishment that are specific to plasma to be used for fractionation.

### **Responsible Person (RP)**

A person responsible for securing that each batch of (biological) active substance or medicinal product has been manufactured and checked in compliance with the laws in force and in accordance with the specifications and/or requirements of the marketing authorisation. The RP is equivalent to the EU term "Qualified Person"<sup>9</sup>.

### **Responsible Person (RP) for blood establishment**

A person responsible for ensuring that every unit of blood or blood components has been collected and tested, processed, stored and distributed in compliance with the laws in force. This term is equivalent to the EU term "Responsible Person"<sup>10</sup>.

---

<sup>5</sup> For EU/EEA as established in the Annex of Directive 2005/62/EC

<sup>6</sup> For EU/EEA as referred to as referred to in Directive 2001/83/EC (Art. 1 No. 10)

<sup>7</sup> For EU/EEA as referred to in Directive 2001/83/EC (Annex I, Part III, No. 1.1.a)

<sup>8</sup> For EU/EEA as according to the terminology of directive 2005/62/EC

<sup>9</sup> For EU/EEA, see Article 48 of Directive 2001/83/EC and Article 52 of Directive 2001/82/EC.

<sup>10</sup> For EU/EEA, see Article 9 of Directive 2002/98/EC.

### **Contract fractionation program**

This is a contract fractionation in a national plant of a fractionator/manufacturer, using starting material from other countries and manufacturing products not intended for the national market.

## **1. SCOPE**

- 1.1 The provisions of this Annex apply to medicinal products derived from human blood or plasma, fractionated in or imported into the country. The Annex applies also to the starting material (e.g. human plasma) for these products. In line with national legislation<sup>11</sup> the requirements may apply also for stable derivatives of human blood or human plasma (e.g. Albumin) incorporated into medical devices.
- 1.2 This Annex defines specific Good Manufacturing Practices (GMP) requirements for collection, processing, storage and transport of human plasma used for fractionation and for the manufacture of medicinal products derived from human blood or plasma.
- 1.3 The Annex addresses specific provisions for when starting material is imported from other countries and for contract fractionation programs for other countries.
- 1.4 The Annex does not apply to blood components intended for transfusion.

## **2. PRINCIPLES**

- 2.1 Medicinal products derived from human blood or plasma (and their active substances which are used as starting materials) must comply with the principles and guidelines of Good Manufacturing Practice<sup>12</sup> as well as the relevant marketing authorisation. They are considered to be biological medicinal products and the starting materials include biological substances, such as cells or fluids (including blood or plasma) of human origin. Certain special features arise from the biological nature of the source material. For example, disease-transmitting agents, especially viruses, may contaminate the source material. The quality and safety of these products relies therefore on the control of source materials and their origin as well as on the subsequent manufacturing procedures, including infectious marker testing, virus removal and virus inactivation.
- 2.2 In principle active substances used as starting material for medicinal products must comply with the principles and guidelines of Good Manufacturing Practice (see 2.1). For starting materials derived from human blood and plasma national<sup>13</sup> or international requirements for blood establishments involved in the collection, preparation and testing are to be followed. Collection, preparation and testing

---

<sup>11</sup> For EU/EEA as set out in Directive 2003/63/EC

<sup>12</sup> For EU/EEA this is laid down in Commission Directive 2003/94/EC and the EU Guidelines on GMP published by the European Commission.

<sup>13</sup> For EU/EEA requirement for the collection and testing are defined in Directive 2002/98/EC.

must be performed in accordance with an appropriate quality system<sup>14</sup> and for which standards and specifications are defined. Furthermore, the national<sup>15</sup> or international requirements on traceability and serious adverse reactions and serious adverse event notifications from the donor to the recipient should be applied. Reference is hereby made to international guidelines as defined in the addendum. In addition the monographs of the relevant Pharmacopoeia<sup>16</sup> are to be observed.

- 2.3 Starting material for the manufacture of medicinal products derived from human blood or plasma imported from other countries and intended for use or distribution within the country must meet the national<sup>17</sup> standards.
- 2.4 In the case of contract fractionation programs the starting material imported from other countries must comply with the national or equivalent<sup>18</sup> quality and safety requirements for blood components. The activities conducted within the country must fully comply with GMP. Consideration should be given to national<sup>19</sup> standards and specifications relating to a quality system for blood establishments, the traceability requirements and notification of serious adverse reactions and events and the relevant WHO guidelines and recommendations as listed in the addendum.
- 2.5 All subsequent steps after collection and testing (e.g. processing (including separation), freezing, storage and transport to the manufacturer) must therefore be done in accordance with the principles and guidelines of Good Manufacturing Practice<sup>20</sup>. Normally, these activities would be carried out under the responsibility of a Responsible Person in an establishment with a manufacturing authorisation. Where specific processing steps in relation to plasma for fractionation take place in a blood establishment, the specific appointment of a Responsible Person may, however, not be proportionate given the presence and responsibility of a Responsible Person of the blood establishment. To address this particular situation and to ensure the legal responsibilities of the Responsible Person are properly addressed, the fractionation plant/manufacturer should establish a contract in accordance with Chapter 7 of the GMP Guide with the blood establishment that defines respective responsibilities and the detailed

---

<sup>14</sup> For EU/EEA standards and specifications for quality systems are defined in the Annex of Directive 2005/62/EC and interpreted in the Good Practice guidelines referred to in Article 2 (2) of Directive 2005/62/EC.

<sup>15</sup> For EU/EEA requirements on traceability and serious adverse reactions and serious adverse event notifications are defined in Directive 2005/61/EC.

<sup>16</sup> For EU/EEA this is the European Pharmacopoeia as defined in Directive 2002/98/EC.

<sup>17</sup> For EU/EEA these standards are equivalent to Community Standards and specifications relating to a quality system for blood establishments as set out in Commission Directive 2005/62/EC (Recital 6; Article 2(3)), the traceability and serious adverse reaction and serious adverse event notification requirements as set out in Commission Directive 2005/61/EC (Recital 5; Article 7), and the technical requirements for blood and blood components as set out in Commission Directive 2004/33/EC (Recital 4; point 2.3 of Annex V).

<sup>18</sup> For EU/EEA reference is made to the quality and safety requirements as laid down in Directive 2002/98/EC and in Annex V of Directive 2004/33/EC.

<sup>19</sup> For EU/EEA considerations should be given to the Community standards and specifications relating to a quality system for blood establishments set out in Commission Directive 2005/62/EC and the traceability requirements and notification of serious adverse reactions and events as set out in Commission Directive 2005/61/EC.

<sup>20</sup> For EU/EEA the requirements of Directive 2001/83/EC apply.

requirements in order to ensure compliance. The Responsible Person of the blood establishment and the Responsible Person of the fractionation/manufacturing plant (see 3.5) should be involved in drawing up this contract. The Responsible Person should ensure that audits are performed to confirm that the blood establishment complies with the contract.

- 2.6 Depending on national legislation, specific requirements for documentation and other arrangements relating to the starting material of plasma-derived medicinal products are defined in the Plasma Master File.

### **3. QUALITY MANAGEMENT**

- 3.1 Quality management should govern all stages from donor selection in the blood establishment up to delivery of the finished product by the finished product manufacturer. Traceability of each donation up to and including the delivery of plasma to the fractionation plant should be ensured by the blood establishment through accurate identification procedures, record maintenance and an appropriate labelling system according to national<sup>21</sup> or international requirements, and should be maintained during further manufacturing and distribution of final products by the manufacturer.

- 3.2 Blood or plasma used as source material for the manufacture of medicinal products must be collected and processed by blood establishments and be tested in laboratories which apply quality systems in accordance with national<sup>22</sup> or international standards. Reference is made to documents listed in the addendum. The blood establishments have to be authorised and subject to regular inspections by a national competent authority<sup>23</sup>. Contract fractionation programs have to be notified to the competent authority by the manufacturer<sup>24</sup>.

- 3.3 If plasma is imported from other countries it should only be purchased from approved suppliers (e.g. blood establishments, including external warehouses). They should be named in the specifications for starting materials as defined by the fractionation plant/manufacturer, and be accepted by the competent authority (e.g. following an inspection) of the importing country and by the Responsible Person of the importing fractionation plant. Certification and release of plasma (plasma for fractionation) as starting material is mentioned in section 6.8.

- 3.4 Supplier qualification, including audits, should be performed by the fractionation plant/manufacturer of the finished product including test laboratory according to written procedures. Re-qualification of suppliers should be performed at regular intervals taking a risk-based approach into account.

- 3.5 The fractionation plant/manufacturer of the finished product should establish written contracts with the supplying blood establishments. As a minimum the following key aspects should be addressed:

- definition of duties and respective responsibilities

---

<sup>21</sup> For EU/EEA reference is made to Directive 2005/61/EC and to Directive 2005/62/EC.

<sup>22</sup> For EU/EEA reference is made to Directive 2005/62/EC.

<sup>23</sup> For EU/EEA as referred to in Directive 2002/98/EC

<sup>24</sup> For EU/EEA it is the competent authority as referred to in Directive 2001/83/EC.

- quality system and documentation requirements
- donor selection criteria and testing
- requirements for the separation of blood into blood components/plasma
- freezing of plasma
- storage and transport of plasma
- traceability and post donation / collection information (including adverse events).

The test results of all units supplied by the blood establishment should be available to the fractionation plant/manufacturer of the medicinal product. In addition, any fractionation step subcontracted should be defined in a written contract.

- 3.6 A formal change control system should be in place to plan, evaluate and document all changes that may affect the quality or safety of the products, or traceability. The potential impact of proposed changes should be evaluated. The need for additional testing and validation, especially viral inactivation and removal steps, should be determined.
- 3.7 An adequate safety strategy should be in place to minimise the risk from infectious agents and emerging infectious agents. This strategy should involve a risk assessment that:
- defines an inventory holding time (internal quarantine time) before processing the plasma i.e. to remove look back units<sup>25</sup>.
  - considers all aspects of virus reduction and/or testing for infectious agents or surrogates.
  - considers the virus reduction capabilities, the pool size and other relevant aspects of the manufacturing processes.

#### **4. TRACEABILITY AND POST COLLECTION MEASURES**

- 4.1 There must be a system in place that enables each donation to be traced, from the donor and the donation via the blood establishment through to the batch of medicinal product and vice versa.
- 4.2 Responsibilities for traceability of the product should be defined (there should be no gaps):
- from the donor and the donation in the blood establishment to the fractionation plant (this is the responsibility of the RP of the blood establishment);
  - from the fractionation plant to the manufacturer of the medicinal product and any secondary facility, whether a manufacturer of a medicinal product or of a medical device (this is the responsibility of the RP).

---

<sup>25</sup> Plasma units donated by donors during a defined period (as defined on a national / EU basis) before it is found that a donation from a high-risk donor should have been excluded from processing, e.g. due to a positive test result.

- 4.3 Data needed for full traceability must be stored according to national legislation<sup>26</sup>.
- 4.4 The contracts (as mentioned in 3.5) between the blood establishments (including testing laboratories) and the fractionation plant/manufacturer should ensure that traceability and post collection measures cover the complete chain from the collection of the plasma to all manufacturers responsible for release of the final products.
- 4.5 The blood establishments should notify the fractionating plant/manufacturer of any event which may affect the quality or safety of the product including serious adverse events and reactions<sup>27</sup> and other relevant information found subsequent to donor acceptance or release of the plasma, e.g. look back information<sup>28</sup> (post-collection information). Where the fractionation plant/manufacturer is located in another country, the information should be forwarded to the manufacturer responsible for release in the country of any product manufactured from the plasma concerned. In both cases, if relevant for the quality or safety of the final product, this information should be forwarded to the competent authority<sup>29</sup> responsible for the fractionation plant/manufacturer as required by national legislation.
- 4.6 The notification procedure as described in 4.5 also applies when an inspection of a blood establishment by a competent authority leads to a withdrawal of an existing licence/certificate/ approval.
- 4.7 The management of post-collection information should be described in standard operating procedures and taking into account obligations and procedures for informing the competent authorities. Post-collection measures should be available as defined in national or relevant international recommendations<sup>30</sup>.

The blood establishment and the fractionation/manufacturer should inform each other if, following donation:

- It is found that the donor did not meet the relevant donor health criteria;
- A subsequent donation from a donor previously found negative for viral markers is found positive for any of the viral markers;
- It is discovered that testing for viral markers has not been carried out according to agreed procedures;
- The donor has developed an infectious disease caused by an agent potentially transmissible by plasma-derived products (HBV, HCV, HAV and other non-A, non-B, non-C hepatitis viruses, HIV-1 and 2 and other agents in the light of current knowledge);

---

<sup>26</sup> For EU/EEA this is for at least 30 years according to Article 4 of Directive 2005/61/EC and Article 14 of Directive 2002/98/EC. Both Directives are linked to Article 109 of Directive 2001/83/EC by defining specific rules for medicinal products derived from human blood or plasma.

<sup>27</sup> For EU/EEA reference is made to in Annex II part A and Annex III part A of Directive 2005/61/EC.

<sup>28</sup> Information that appears if a subsequent donation from a donor previously found negative for viral markers is found positive for any of the viral markers or any other risk factors which may induce a viral infection.

<sup>29</sup> For EU/EEA this is the competent authority as referred to in Directive 2001/83/EC.

<sup>30</sup> For EU/EEA referene is made to the "Note for Guidance on Plasma Derived Medicinal Products" in its current version as adopted by the Committee for Medicinal Products for Human Use (CHMP) and published by the European Medicines Agency. Current version at date of publication: CPMP/BWP/269/95.

- The donor develops Creutzfeldt-Jakob disease (CJD or vCJD);
- The recipient of blood or a blood component develops post-transfusion infection which implicates or can be traced back to the donor.

In the event of any of the above, a re-assessment of the batch documentation should always be carried out. The need for withdrawal of the given batch should be carefully considered, taking into account criteria such as the transmissible agent involved, the size of the pool, the time period between donation and seroconversion, the nature of the product and its manufacturing method.

## 5. PREMISES AND EQUIPMENT

- 5.1 In order to minimise microbiological contamination or the introduction of foreign material into the plasma pool, thawing and pooling of plasma units should be performed in an area conforming at least to the Grade D requirements defined in Annex 1 of the PIC/S GMP Guide. Appropriate clothing should be worn including face masks and gloves. All other open manipulations during the manufacturing process should be done under conditions conforming to the appropriate requirements of Annex 1 of the PIC/S GMP Guide.
- 5.2 Environmental monitoring should be performed regularly, especially during the 'opening' of plasma containers, and during subsequent thawing and pooling processes in accordance with Annex 1 of the PIC/S GMP Guide.
- 5.3 In the production of plasma-derived medicinal products, appropriate viral inactivation or removal procedures are used and steps should be taken to prevent cross contamination of treated with untreated products. Dedicated and distinct premises and equipment should be used for manufacturing steps before and after viral inactivation treatment.
- 5.4 To avoid placing routine manufacture at risk of contamination from viruses used during validation studies, the validation of methods for virus reduction should not be conducted in production facilities. Validation should be performed according to international recommendations<sup>31</sup>.

## 6. MANUFACTURING

### Starting material

- 6.1 The starting material should comply with the requirements of all relevant monographs of the relevant Pharmacopoeia and of the conditions laid down in the respective marketing authorisation dossier (including the Plasma Master File if applicable). These requirements should be defined in the written contract (see 3.5) between the blood establishment and the fractionating plant/manufacturer and controlled through the quality system.

---

<sup>31</sup> For EU/EEA reference is made to the "Note for Guidance on Virus Validation Studies: The Design, Contribution and Interpretation of Studies validating the Inactivation and Removal of Viruses" in its current version as adopted by the Committee for Medicinal Products for Human Use (CHMP) and published by the European Medicines Agency. Current version at date of publication: CHMP/BWP/268/95.



- 6.2. Starting material imported for contract fractionation programs should comply with the requirements as specified in 2.4.
- 6.3 Depending on the type of collection (i.e. either whole blood collection or automated apheresis) different processing steps may be required. All processing steps (e.g. centrifugation and/or separation, sampling, labelling, freezing) should be defined in written procedures.
- 6.4 Any mix-ups of units and of samples, especially during labelling, as well as any contamination, e.g. when cutting the tube segments/sealing the containers, must be avoided.
- 6.5 Freezing is a critical step for the recovery of proteins that are labile in plasma, e.g. clotting factors. Freezing should therefore be performed as soon as possible after collection (see the European Pharmacopoeia monograph No 0853 "*Human Plasma for Fractionation*" and where relevant, monograph No 1646 "*Human Plasma pooled and treated for virus inactivation*", or other relevant Pharmacopoeia), following a validated method.
- 6.6 The storage and transport of blood or plasma at any stage in the transport chain to the fractionation plant should be defined and recorded. Any deviation from the defined temperature should be notified to the fractionation plant. Qualified equipment and validated procedures should be used.

#### **Certification/release of plasma for fractionation as starting material**

- 6.7 Plasma for fractionation should only be released, i.e. from a quarantine status, through systems and procedures that assure the quality needed for the manufacture of the finished product. It should only be distributed to the plasma fractionation plant/manufacturer after it has been documented by the Responsible Person of the blood establishment (or in case of blood/plasma collection in other countries by a person with equivalent responsibilities and qualifications) that the plasma for fractionation does comply with the requirements and specifications defined in the respective written contracts and that all steps have been performed in accordance with Good Practice and GMP Guidelines, as appropriate.
- 6.8 On entering the fractionation plant, the plasma units should be released for fractionation under the responsibility of the Responsible Person. The Responsible Person should confirm that the plasma complies with the requirements of all relevant monographs and the conditions laid down in the respective marketing authorisation dossier (including the Plasma Master File if applicable) or, in case of plasma to be used for contract fractionation programs, with the requirements as specified in 2.4.

#### **Processing of plasma for fractionation**

- 6.9 The steps used in the fractionation process vary according to product and manufacturer and usually include several fractionation/purification procedures, some of which may contribute to the inactivation and/or removal of potential contamination.

- 6.10 Requirements for the processes of pooling, pool sampling and fractionation/purification and virus inactivation/removal should be defined and followed thoroughly.
- 6.11 The methods used in the viral inactivation process should be undertaken with strict adherence to validated procedures and in compliance with the methods used in the virus validation studies. Detailed investigation of failures in virus inactivation procedures should be performed. Adherence to the validated production process is especially important in the virus reduction procedures as any deviation could result in a safety risk for the final product. Procedures which take this risk into consideration should be in place.
- 6.12 Any reprocessing or reworking may only be performed after a quality risk management exercise has been performed and using processing steps as defined in the relevant marketing authorisation.
- 6.13 A system for clearly segregating/distinguishing between products or intermediates which have undergone a process of virus reduction, from those which have not, should be in place.
- 6.14 Depending on the outcome of a thorough risk management process (taking into consideration possible differences in epidemiology) production in campaigns including clear segregation and defined validated cleaning procedures should be adopted when plasma/intermediates of different origins is processed at the same plant. The requirement for such measures should be based on international recommendations<sup>32</sup>. The risk management process should consider whether it is necessary to use dedicated equipment in the case of contract fractionation programs.
- 6.15 For intermediate products intended to be stored, a shelf-life should be defined based on stability data.
- 6.16 The storage and transport of intermediate and finished medicinal products at any stage of the transport chain should be specified and recorded. Qualified equipment and validated procedures should be used.

## 7. QUALITY CONTROL

- 7.1 Testing requirements for viruses or other infectious agents should be considered in the light of knowledge emerging on infectious agents and on the availability of appropriate, validated test methods.
- 7.2 The first homogeneous plasma pool (e.g. after separation of the cryoprecipitate from the plasma pool) should be tested using validated test methods of suitable sensitivity and specificity, according to the relevant Pharmacopoeia monographs<sup>33</sup>.

---

<sup>32</sup> For EU/EEA, see Guideline on Epidemiological Data on Blood Transmissible Infections, EMEA/CPMP/BWP/125/04.

<sup>33</sup> For EU/EEA reference is made to the relevant European Pharmacopoeia monographs (e.g. No 0853).

## **8. RELEASE OF INTERMEDIATE AND FINISHED PRODUCTS**

- 8.1 Only batches derived from plasma pools tested and found negative for virus markers / antibodies and found in compliance with the relevant Pharmacopoeia monographs, including any specific virus cut-off limits, and with the approved specifications (e.g. Plasma Master File if applicable), should be released.
- 8.2 The release of intermediates intended for further in-house processing or delivery to a different site and the release of finished products should be performed by the Responsible Person and in accordance with the approved marketing authorisation.
- 8.3. The release of intermediates and final products used in contract fractionation programs should be performed by the Responsible Person on the basis of standards agreed with the contract giver and compliance with PIC/S GMP standards.

## **9. RETENTION OF PLASMA POOL SAMPLES**

One plasma pool may be used to manufacture more than one batch and/or product. Retention samples and corresponding records from every pool should be kept for at least one year after the expiry date of the finished medicinal product with the longest shelf-life derived from the pool.

## **10. DISPOSAL OF WASTE**

There should be written procedures for the safe and documented storage and disposal of waste, disposable and rejected items (e.g. contaminated units, units from infected donors, out of date blood, plasma, intermediate or finished products).

## **ADDENDUM**

The Addendum lists EU-specific directives and guidelines which give further guidance on specific topics or must be implemented by EU/EEA Member States.

## Addendum

A) EU/EEA Member States have been obliged to implement the following Directives and guidelines:

1. for collection and testing of blood and blood components:

Directive/Guidelines	Title	Scope
Directive 2002/98/EC of the European Parliament and of the Council	Setting standards of quality and safety for the collection, testing, processing, storage and distribution of human blood and blood components, amending Directive 2001/83/EC.	Art.2 Defines standards of quality and safety for the collection and testing of human blood and blood components, whatever their intended purpose, and for their processing, storage and distribution when intended for transfusion.
Commission Directive 2004/33/EC	Implementing Directive 2002/98/EC of the European Parliament and of the Council as regards certain technical requirements for blood and blood components	Defines the provision of information to prospective donors and information required from donors (Part A and B, Annex II), eligibility of donors (Annex III), storage, transport and distribution conditions for blood and blood components (Annex IV), as well as quality and safety requirements for blood and blood components (Annex V).
Commission Directive 2005/61/EC	Implementing Directive 2002/98/EC of the European Parliament and of the Council as regards traceability requirements and notification of serious adverse reactions and events.	Defines traceability requirements for blood establishments, donors, blood and blood components, and for the final destination of each unit, whatever the intended purpose. It further defines the reporting requirements in the event of serious adverse events and reactions.
Commission Directive 2005/62/EC	Implementing Directive 2002/98/EC of the European Parliament and of the Council as regards Community standards and specifications relating to a quality system for blood establishments.	Defines the implementation of quality system standards and specifications as referred to in article 47 of Directive 2001/83/EC.

2. for collection and regulatory submission of data/information for plasma for fractionation:

<b>Directive/ Guidelines</b>	<b>Title</b>	<b>Scope</b>
Directive 2001/83/EC of the European Parliament and the Council	On the Community Code relating to medicinal products for human use.	Art. 2 Medicinal products for human use intended to be placed on the market in Member States and either prepared industrially or manufactured by a method involving an industrial process, covering medicinal products derived from human blood or human plasma.
Commission Directive 2003/63/EC	Amending Directive 2001/83/EC of the European Parliament and of the Council on the Community code relating to medicinal products for human use; Amending the Annex on documentation of medicinal products	
Commission Directive 2003/94/EC	Laying down the principles and guidelines of good manufacturing practice in respect of medicinal products for human use and investigational medicinal products for human use	Art. 1 Principles and guidelines of good manufacturing practice in respect of medicinal products for human use and investigational medicinal products for human use
EU Guidelines to Good Manufacturing Practice	Giving interpretation on the principles and guidelines on GMP	
EMA/CHMP/BWP/37 94/03 Rev.1, 15. Nov. 2006	Guideline on the Scientific data requirements for a Plasma Master File (PMF) Revision 1	
EMA/CPMP/BWP/12 5/04 EMA Guideline	Guideline on Epidemiological Data on Blood Transmissible Infections	

B. Other relevant documents:

<b>Document</b>	<b>Title</b>	<b>Scope</b>
PE 005	PIC/S GMP Guide for blood establishments	Guidance for GMP for blood establishments
Recommendation No. R (95) 15 (Council of Europe)	Guide to the Preparation, use and quality assurance of blood components	
World Health Organization WHO Technical Report Series No 941, 2007; Annex 4	WHO Recommendations for the production, control and regulation of human plasma for fractionation	Guidance on the production, control and regulation of human plasma for fractionation, adopted by the 56 <sup>th</sup> meeting of the WHO Expert Committee on Biological Standardization, 24-28 October 2005
World Health Organization, WHO Technical Report Series, No. 961, 2011; Annex 4	WHO guidelines on Good Manufacturing Practices for blood establishments	

Reference should be made to the latest revisions of these documents for current guidance.

---

## ANNEX 15

# QUALIFICATION AND VALIDATION

## PRINCIPLE

This Annex describes the principles of qualification and validation which are applicable to the facilities, equipment, utilities and processes used for the manufacture of medicinal products and may also be used as supplementary optional guidance for active substances without introduction of additional requirements to Part II. It is a GMP requirement that manufacturers control the critical aspects of their particular operations through qualification and validation over the life cycle of the product and process. Any planned changes to the facilities, equipment, utilities and processes, which may affect the quality of the product, should be formally documented and the impact on the validated status or control strategy assessed. Computerised systems used for the manufacture of medicinal products should also be validated according to the requirements of Annex 11. The relevant concepts and guidance presented in ICH Q8, Q9, Q10 and Q11 should also be taken into account.

## GENERAL

A quality risk management approach should be applied throughout the lifecycle of a medicinal product. As part of a quality risk management system, decisions on the scope and extent of qualification and validation should be based on a justified and documented risk assessment of the facilities, equipment, utilities and processes. Retrospective validation is no longer considered an acceptable approach.

Data supporting qualification and/or validation studies which were obtained from sources outside of the manufacturers own programmes may be used provided that this approach has been justified and that there is adequate assurance that controls were in place throughout the acquisition of such data.

### 1. ORGANISING AND PLANNING FOR QUALIFICATION AND VALIDATION

- 1.1 All qualification and validation activities should be planned and take the life cycle of facilities, equipment, utilities, process and product into consideration.
- 1.2 Qualification and validation activities should only be performed by suitably trained personnel who follow approved procedures.
- 1.3 Qualification/validation personnel should report as defined in the pharmaceutical quality system although this may not necessarily be to a quality management or a quality assurance function. However, there should be appropriate quality oversight over the whole validation life cycle.
- 1.4 The key elements of the site qualification and validation programme should be clearly defined and documented in a validation master plan (VMP) or equivalent document.

- 1.5 The VMP or equivalent document should define the qualification/validation system and include or reference information on at least the following:
- i. Qualification and Validation policy;
  - ii. The organisational structure including roles and responsibilities for qualification and validation activities;
  - iii. Summary of the facilities, equipment, systems, processes on site and the qualification and validation status;
  - iv. Change control and deviation management for qualification and validation;
  - v. Guidance on developing acceptance criteria;
  - vi. References to existing documents;
  - vii. The qualification and validation strategy, including requalification, where applicable.
- 1.6 For large and complex projects, planning takes on added importance and separate validation plans may enhance clarity
- 1.7 A quality risk management approach should be used for qualification and validation activities. In light of increased knowledge and understanding from any changes during the project phase or during commercial production, the risk assessments should be repeated, as required. The way in which risk assessments are used to support qualification and validation activities should be clearly documented.
- 1.8 Appropriate checks should be incorporated into qualification and validation work to ensure the integrity of all data obtained.

## **2. DOCUMENTATION, INCLUDING VMP**

- 2.1 Good documentation practices are important to support knowledge management throughout the product lifecycle.
- 2.2 All documents generated during qualification and validation should be approved and authorised by appropriate personnel as defined in the pharmaceutical quality system.
- 2.3 The inter-relationship between documents in complex validation projects should be clearly defined.
- 2.4 Validation protocols should be prepared which defines the critical systems, attributes and parameters and the associated acceptance criteria.
- 2.5 Qualification documents may be combined together, where appropriate, e.g. installation qualification (IQ) and operational qualification (OQ).
- 2.6 Where validation protocols and other documentation are supplied by a third party providing validation services, appropriate personnel at the manufacturing site should confirm suitability and compliance with internal procedures before approval. Vendor protocols may be supplemented by additional documentation/test protocols before use.
- 2.7 Any significant changes to the approved protocol during execution, e.g. acceptance criteria, operating parameters etc., should be documented as a



---

deviation and be scientifically justified.

- 2.8 Results which fail to meet the pre-defined acceptance criteria should be recorded as a deviation, and be fully investigated according to local procedures. Any implications for the validation should be discussed in the report.
- 2.9 The review and conclusions of the validation should be reported and the results obtained summarised against the acceptance criteria. Any subsequent changes to acceptance criteria should be scientifically justified and a final recommendation made as to the outcome of the validation.
- 2.10 A formal release for the next stage in the qualification and validation process should be authorised by the relevant responsible personnel either as part of the validation report approval or as a separate summary document. Conditional approval to proceed to the next qualification stage can be given where certain acceptance criteria or deviations have not been fully addressed and there is a documented assessment that there is no significant impact on the next activity.

### **3. QUALIFICATION STAGES FOR EQUIPMENT, FACILITIES, UTILITIES AND SYSTEMS.**

- 3.1 Qualification activities should consider all stages from initial development of the user requirements specification through to the end of use of the equipment, facility, utility or system. The main stages and some suggested criteria (although this depends on individual project circumstances and may be different) which could be included in each stage are indicated below:

#### **User requirements specification (URS)**

- 3.2 The specification for equipment, facilities, utilities or systems should be defined in a URS and/or a functional specification. The essential elements of quality need to be built in at this stage and any GMP risks mitigated to an acceptable level. The URS should be a point of reference throughout the validation life cycle.

#### **Design qualification (DQ)**

- 3.3 The next element in the qualification of equipment, facilities, utilities, or systems is DQ where the compliance of the design with GMP should be demonstrated and documented. The requirements of the user requirements specification should be verified during the design qualification.

#### **Factory acceptance testing (FAT) /Site acceptance testing (SAT)**

- 3.4 Equipment, especially if incorporating novel or complex technology, may be evaluated, if applicable, at the vendor prior to delivery.
- 3.5 Prior to installation, equipment should be confirmed to comply with the URS/functional specification at the vendor site, if applicable.
- 3.6 Where appropriate and justified, documentation review and some tests could be performed at the FAT or other stages without the need to repeat on site at IQ/OQ if it can be shown that the functionality is not affected by the transport and installation.
- 3.7 FAT may be supplemented by the execution of a SAT following the receipt of equipment at the manufacturing site.

**Installation qualification (IQ)**

- 3.8 IQ should be performed on equipment, facilities, utilities, or systems.
- 3.9 IQ should include, but is not limited to the following:
- i. Verification of the correct installation of components, instrumentation, equipment, pipe work and services against the engineering drawings and specifications;
  - ii. Verification of the correct installation against pre-defined criteria;
  - iii. Collection and collation of supplier operating and working instructions and maintenance requirements;
  - iv. Calibration of instrumentation;
  - v. Verification of the materials of construction.

**Operational qualification (OQ)**

- 3.10 OQ normally follows IQ but depending on the complexity of the equipment, it may be performed as a combined Installation/Operation Qualification (IOQ).
- 3.11 OQ should include but is not limited to the following:
- i. Tests that have been developed from the knowledge of processes, systems and equipment to ensure the system is operating as designed;
  - ii. Tests to confirm upper and lower operating limits, and/or “worst case” conditions.
- 3.12 The completion of a successful OQ should allow the finalisation of standard operating and cleaning procedures, operator training and preventative maintenance requirements.

**Performance qualification (PQ)**

- 3.13 PQ should normally follow the successful completion of IQ and OQ. However, it may in some cases be appropriate to perform it in conjunction with OQ or Process Validation.
- 3.14 PQ should include, but is not limited to the following:
- i. Tests, using production materials, qualified substitutes or simulated product proven to have equivalent behaviour under normal operating conditions with worst case batch sizes. The frequency of sampling used to confirm process control should be justified;
  - ii. Tests should cover the operating range of the intended process, unless documented evidence from the development phases confirming the operational ranges is available.

**4. RE-QUALIFICATION**

- 4.1 Equipment, facilities, utilities and systems should be evaluated at an appropriate frequency to confirm that they remain in a state of control.
- 4.2 Where re-qualification is necessary and performed at a specific time period, the period should be justified and the criteria for evaluation defined. Furthermore,

---

the possibility of small changes over time should be assessed.

## 5. PROCESS VALIDATION

### General

- 5.1 The requirements and principles outlined in this section are applicable to the manufacture of all pharmaceutical dosage forms. They cover the initial validation of new processes, subsequent validation of modified processes, site transfers and ongoing process verification. It is implicit in this annex that a robust product development process is in place to enable successful process validation.
- 5.2 Section 5 should be used in conjunction with relevant guidelines on Process Validation<sup>1</sup>.
- 5.2.1 A guideline on Process Validation is intended to provide guidance on the information and data to be provided in the regulatory submission only. However, GMP requirements for process validation continue throughout the lifecycle of the process
- 5.2.2 This approach should be applied to link product and process development. It will ensure validation of the commercial manufacturing process and maintenance of the process in a state of control during routine commercial production.

---

<sup>1</sup> In the EU/EEA, see EMA/CHMP/CVMP/QWP/BWP/70278/2012

- 5.3 Manufacturing processes may be developed using a traditional approach or a continuous verification approach. However, irrespective of the approach used, processes must be shown to be robust and ensure consistent product quality before any product is released to the market. Manufacturing processes using the traditional approach should undergo a prospective validation programme wherever possible prior to certification of the product. Retrospective validation is no longer an acceptable approach.
- 5.4 Process validation of new products should cover all intended marketed strengths and sites of manufacture. Bracketing could be justified for new products based on extensive process knowledge from the development stage in conjunction with an appropriate ongoing verification programme.
- 5.5 For the process validation of products, which are transferred from one site to another or within the same site, the number of validation batches could be reduced by the use of a bracketing approach. However, existing product knowledge, including the content of the previous validation, should be available. Different strengths, batch sizes and pack sizes/ container types may also use a bracketing approach if justified.
- 5.6 For the site transfer of legacy products, the manufacturing process and controls must comply with the marketing authorisation and meet current standards for marketing authorisation for that product type. If necessary, variations to the marketing authorisation should be submitted.
- 5.7 Process validation should establish whether all quality attributes and process parameters, which are considered important for ensuring the validated state and acceptable product quality, can be consistently met by the process. The basis by which process parameters and quality attributes were identified as being critical or non-critical should be clearly documented, taking into account the results of any risk assessment activities.
- 5.8 Normally batches manufactured for process validation should be the same size as the intended commercial scale batches and the use of any other batch sizes should be justified or specified in other sections of the GMP guide.
- 5.9 Equipment, facilities, utilities and systems used for process validation should be qualified. Test methods should be validated for their intended use.
- 5.10 For all products irrespective of the approach used, process knowledge from development studies or other sources should be accessible to the manufacturing site, unless otherwise justified, and be the basis for validation activities.
- 5.11 For process validation batches, production, development, or other site transfer personnel may be involved. Batches should only be manufactured by trained personnel in accordance with GMP using approved documentation. It is expected that production personnel are involved in the manufacture of validation batches to facilitate product understanding.
- 5.12 The suppliers of critical starting and packaging materials should be qualified prior to the manufacture of validation batches; otherwise a justification based on the application of quality risk management principles should be documented.

- 5.13 It is especially important that the underlying process knowledge for the design space justification (if used) and for development of any mathematical models (if used) to confirm a process control strategy should be available.
- 5.14 Where validation batches are released to the market this should be pre-defined. The conditions under which they are produced should fully comply with GMP, with the validation acceptance criteria, with any continuous process verification criteria (if used) and with the marketing authorisation or clinical trial authorisation.
- 5.15 For the process validation of investigational medicinal products (IMP), please refer to Annex 13.

#### **Concurrent validation**

- 5.16 In exceptional circumstances, where there is a strong benefit-risk ratio for the patient, it may be acceptable not to complete a validation programme before routine production starts and concurrent validation could be used. However, the decision to carry out concurrent validation must be justified, documented in the VMP for visibility and approved by authorised personnel.
- 5.17 Where a concurrent validation approach has been adopted, there should be sufficient data to support a conclusion that any given batch of product is uniform and meets the defined acceptance criteria. The results and conclusion should be formally documented and available to the Authorised Person prior to certification of the batch.

#### **Traditional process validation**

- 5.18 In the traditional approach, a number of batches of the finished product are manufactured under routine conditions to confirm reproducibility.
- 5.19 The number of batches manufactured and the number of samples taken should be based on quality risk management principles, allow the normal range of variation and trends to be established and provide sufficient data for evaluation. Each manufacturer must determine and justify the number of batches necessary to demonstrate a high level of assurance that the process is capable of consistently delivering quality product.
- 5.20 Without prejudice to 5.19, it is generally considered acceptable that a minimum of three consecutive batches manufactured under routine conditions could constitute a validation of the process. An alternative number of batches may be justified taking into account whether standard methods of manufacture are used and whether similar products or processes are already used at the site. An initial validation exercise with three batches may need to be supplemented with further data obtained from subsequent batches as part of an on-going process verification exercise.
- 5.21 A process validation protocol should be prepared which defines the critical process parameters (CPP), critical quality attributes (CQA) and the associated acceptance criteria which should be based on development data or documented process knowledge.
- 5.22 Process validation protocols should include, but are not limited to the following:

- i. A short description of the process and a reference to the respective Master Batch Record;
- ii. Functions and responsibilities;
- iii. Summary of the CQAs to be investigated;
- iv. Summary of CPPs and their associated limits;
- v. Summary of other (non-critical) attributes and parameters which will be investigated or monitored during the validation activity, and the reasons for their inclusion;
- vi. List of the equipment/facilities to be used (including measuring/monitoring/recording equipment) together with the calibration status;
- vii. List of analytical methods and method validation, as appropriate;
- viii. Proposed in-process controls with acceptance criteria and the reason(s) why each in-process control is selected;
- ix. Additional testing to be carried out, with acceptance criteria;
- x. Sampling plan and the rationale behind it;
- xi. Methods for recording and evaluating results;
- xii. Process for release and certification of batches (if applicable).

### **Continuous process verification**

- 5.23 For products developed by a quality by design approach, where it has been scientifically established during development that the established control strategy provides a high degree of assurance of product quality, then continuous process verification can be used as an alternative to traditional process validation.
- 5.24 The method by which the process will be verified should be defined. There should be a science based control strategy for the required attributes for incoming materials, critical quality attributes and critical process parameters to confirm product realisation. This should also include regular evaluation of the control strategy. Process Analytical Technology and multivariate statistical process control may be used as tools. Each manufacturer must determine and justify the number of batches necessary to demonstrate a high level of assurance that the process is capable of consistently delivering quality product.
- 5.25 The general principles laid down in 5.1 – 5.14 above still apply.

### **Hybrid approach**

- 5.26 A hybrid of the traditional approach and continuous process verification could be used where there is a substantial amount of product and process knowledge and understanding which has been gained from manufacturing experience and historical batch data.
- 5.27 This approach may also be used for any validation activities after changes or during ongoing process verification even though the product was initially validated using a traditional approach.

### **Ongoing Process Verification during Lifecycle**

- 5.28 Paragraphs 5.28-5.32 are applicable to all three approaches to process validation

mentioned above, i.e. traditional, continuous and hybrid.

- 5.29 Manufacturers should monitor product quality to ensure that a state of control is maintained throughout the product lifecycle with the relevant process trends evaluated.
- 5.30 The extent and frequency of ongoing process verification should be reviewed periodically. At any point throughout the product lifecycle, it may be appropriate to modify the requirements taking into account the current level of process understanding and process performance.
- 5.31 Ongoing process verification should be conducted under an approved protocol or equivalent documents and a corresponding report should be prepared to document the results obtained. Statistical tools should be used, where appropriate, to support any conclusions with regard to the variability and capability of a given process and ensure a state of control.
- 5.32 Ongoing process verification should be used throughout the product lifecycle to support the validated status of the product as documented in the Product Quality Review. Incremental changes over time should also be considered and the need for any additional actions, e.g. enhanced sampling, should be assessed.

## **6. VERIFICATION OF TRANSPORTATION**

- 6.1 Finished medicinal products, investigational medicinal products, bulk product and samples should be transported from manufacturing sites in accordance with the conditions defined in the marketing authorisation, the approved label, product specification file or as justified by the manufacturer.
- 6.2 It is recognised that verification of transportation may be challenging due to the variable factors involved however, transportation routes should be clearly defined. Seasonal and other variations should also be considered during verification of transport
- 6.3 A risk assessment should be performed to consider the impact of variables in the transportation process other than those conditions which are continuously controlled or monitored, e.g. delays during transportation, failure of monitoring devices, topping up liquid nitrogen, product susceptibility and any other relevant factors.
- 6.4 Due to the variable conditions expected during transportation, continuous monitoring and recording of any critical environmental conditions to which the product may be subjected should be performed, unless otherwise justified.

## **7. VALIDATION OF PACKAGING**

- 7.1 Variation in equipment processing parameters especially during primary packaging may have a significant impact on the integrity and correct functioning of the pack, e.g. blister strips, sachets and sterile components; therefore, primary and secondary packaging equipment for finished and bulk products should be qualified.
- 7.2 Qualification of the equipment used for primary packing should be carried out at the minimum and maximum operating ranges defined for the critical process parameters such as temperature, machine speed and sealing pressure or for any other factors.

## 8. QUALIFICATION OF UTILITIES

- 8.1 The quality of steam, water, air, other gases etc. should be confirmed following installation using the qualification steps described in section 3 above.
- 8.2 The period and extent of qualification should reflect any seasonal variations, if applicable, and the intended use of the utility.
- 8.3 A risk assessment should be carried out where there may be direct contact with the product, e.g. heating, ventilation and air-conditioning (HVAC) systems, or indirect contact such as through heat exchangers to mitigate any risks of failure.

## 9. VALIDATION OF TEST METHODS

- 9.1 All analytical test methods used in qualification, validation or cleaning exercises should be validated with an appropriate detection and quantification limit, where necessary, as defined in Chapter 6 of the PIC/S GMP guide Part I.
- 9.2 Where microbial testing of product is carried out, the method should be validated to confirm that the product does not influence the recovery of microorganisms.
- 9.3 Where microbial testing of surfaces in clean rooms is carried out, validation should be performed on the test method to confirm that sanitising agents do not influence the recovery of microorganisms.

## 10. CLEANING VALIDATION

- 10.1 Cleaning validation should be performed in order to confirm the effectiveness of any cleaning procedure for all product contact equipment. Simulating agents may be used with appropriate scientific justification. Where similar types of equipment are grouped together, a justification of the specific equipment selected for cleaning validation is expected.
- 10.2 A visual check for cleanliness is an important part of the acceptance criteria for cleaning validation. It is not generally acceptable for this criterion alone to be used. Repeated cleaning and retesting until acceptable residue results are obtained is not considered an acceptable approach.
- 10.3 It is recognised that a cleaning validation programme may take some time to complete and validation with verification after each batch may be required for some products e.g. investigational medicinal products. There should be sufficient data from the verification to support a conclusion that the equipment is clean and available for further use.
- 10.4 Validation should consider the level of automation in the cleaning process. Where an automatic process is used, the specified normal operating range of the utilities and equipment should be validated.
- 10.5 For all cleaning processes an assessment should be performed to determine the variable factors which influence cleaning effectiveness and performance, e.g. operators, the level of detail in procedures such as rinsing times etc. If variable factors have been identified, the worst case situations should be used as the basis for cleaning validation studies.
- 10.6 Limits for the carryover of product residues should be based on a toxicological evaluation<sup>2</sup>. The justification for the selected limits should be documented in a



---

risk assessment which includes all the supporting references. Limits should be established for the removal of any cleaning agents used. Acceptance criteria should consider the potential cumulative effect of multiple items of equipment in the process equipment train.

- 10.6.1 Therapeutic macromolecules and peptides are known to degrade and denature when exposed to pH extremes and/or heat, and may become pharmacologically inactive. A toxicological evaluation may therefore not be applicable in these circumstances.
- 10.6.2 If it is not feasible to test for specific product residues, other representative parameters may be selected, e.g. total organic carbon (TOC) and conductivity.
- 10.7 The risk presented by microbial and endotoxin contamination should be considered during the development of cleaning validation protocols.
- 10.8 The influence of the time between manufacture and cleaning and the time between cleaning and use should be taken into account to define dirty and clean hold times for the cleaning process.
- 10.9 Where campaign manufacture is carried out, the impact on the ease of cleaning at the end of the campaign should be considered and the maximum length of a campaign (in time and/or number of batches) should be the basis for cleaning validation exercises.
- 10.10 Where a worst case product approach is used as a cleaning validation model, a scientific rationale should be provided for the selection of the worst case product and the impact of new products to the site assessed. Criteria for determining the worst case may include solubility, cleanability, toxicity, and potency.

---

<sup>2</sup> In the EU/EEA, this is the EMA Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

- 10.11 Cleaning validation protocols should specify or reference the locations to be sampled, the rationale for the selection of these locations and define the acceptance criteria.
- 10.12 Sampling should be carried out by swabbing and/or rinsing or by other means depending on the production equipment. The sampling materials and method should not influence the result. Recovery should be shown to be possible from all product contact materials sampled in the equipment with all the sampling methods used.
- 10.13 The cleaning procedure should be performed an appropriate number of times based on a risk assessment and meet the acceptance criteria in order to prove that the cleaning method is validated.
- 10.14 Where a cleaning process is ineffective or is not appropriate for some equipment, dedicated equipment or other appropriate measures should be used for each product as indicated in chapters 3 and 5 of the PIC/S GMP Guide.
- 10.15 Where manual cleaning of equipment is performed, it is especially important that the effectiveness of the manual process should be confirmed at a justified frequency.

## **11. CHANGE CONTROL**

- 11.1 The control of change is an important part of knowledge management and should be handled within the pharmaceutical quality system.
- 11.2 Written procedures should be in place to describe the actions to be taken if a planned change is proposed to a starting material, product component, process, equipment, premises, product range, method of production or testing, batch size, design space or any other change during the lifecycle that may affect product quality or reproducibility.
- 11.3 Where design space is used, the impact on changes to the design space should be considered against the registered design space within the marketing authorisation and the need for any regulatory actions assessed.
- 11.4 Quality risk management should be used to evaluate planned changes to determine the potential impact on product quality, pharmaceutical quality systems, documentation, validation, regulatory status, calibration, maintenance and on any other system to avoid unintended consequences and to plan for any necessary process validation, verification or requalification efforts.
- 11.5 Changes should be authorised and approved by the responsible persons or relevant functional personnel in accordance with the pharmaceutical quality system.
- 11.6 Supporting data, e.g. copies of documents, should be reviewed to confirm that the impact of the change has been demonstrated prior to final approval.
- 11.7 Following implementation, and where appropriate, an evaluation of the effectiveness of change should be carried out to confirm that the change has been successful.

## 12. GLOSSARY

Definitions of terms relating to qualification and validation which are not given in other sections of the current PIC/S Guide to GMP are given below.

### **Bracketing approach:**

A science and risk based validation approach such that only batches on the extremes of certain predetermined and justified design factors, e.g. strength, batch size, and/or pack size, are tested during process validation. The design assumes that validation of any intermediate levels is represented by validation of the extremes. Where a range of strengths is to be validated, bracketing could be applicable if the strengths are identical or very closely related in composition, e.g. for a tablet range made with different compression weights of a similar basic granulation, or a capsule range made by filling different plug fill weights of the same basic composition into different size capsule shells. Bracketing can be applied to different container sizes or different fills in the same container closure system.

### **Change Control**

A formal system by which qualified representatives of appropriate disciplines review proposed or actual changes that might affect the validated status of facilities, systems, equipment or processes. The intent is to determine the need for action to ensure and document that the system is maintained in a validated state.

### **Cleaning Validation**

Cleaning validation is documented evidence that an approved cleaning procedure will reproducibly remove the previous product or cleaning agents used in the equipment below the scientifically set maximum allowable carryover level.

### **Cleaning verification**

The gathering of evidence through chemical analysis after each batch/campaign to show that the residues of the previous product or cleaning agents have been reduced below the scientifically set maximum allowable carryover level.

### **Concurrent Validation**

Validation carried out in exceptional circumstances, justified on the basis of significant patient benefit, where the validation protocol is executed concurrently with commercialisation of the validation batches.

### **Continuous process verification**

An alternative approach to process validation in which manufacturing process performance is continuously monitored and evaluated. (ICH Q8)

### **Control Strategy:**

A planned set of controls, derived from current product and process understanding that ensures process performance and product quality. The controls can include parameters and attributes related to drug substance and drug product materials and components, facility and equipment operating conditions, in-process controls, finished product specifications, and the associated methods and frequency of monitoring and control. (ICH Q10)

### **Critical process parameter (CPP)**

A process parameter whose variability has an impact on a critical quality attribute and therefore should be monitored or controlled to ensure the process produces the desired quality. (ICH Q8)

**Critical quality attribute (CQA)**

A physical, chemical, biological or microbiological property or characteristic that should be within an approved limit, range or distribution to ensure the desired product quality. (ICH Q8)

**Design qualification (DQ)**

The documented verification that the proposed design of the facilities, systems and equipment is suitable for the intended purpose.

**Design Space**

The multidimensional combination and interaction of input variables, e.g. material attributes, and process parameters that have been demonstrated to provide assurance of quality. Working within the design space is not considered as a change. Movement out of the design space is considered to be a change and would normally initiate a regulatory post approval change process. Design space is proposed by the applicant and is subject to regulatory assessment and approval. (ICH Q8)

**Installation Qualification (IQ)**

The documented verification that the facilities, systems and equipment, as installed or modified, comply with the approved design and the manufacturer's recommendations.

**Knowledge management**

A systematic approach to acquire, analyse, store and disseminate information. (ICH Q10)

**Lifecycle**

All phases in the life of a product, equipment or facility from initial development or use through to discontinuation of use.

**Ongoing Process Verification (also known as continued process verification)**

Documented evidence that the process remains in a state of control during commercial manufacture.

**Operational Qualification (OQ)**

The documented verification that the facilities, systems and equipment, as installed or modified, perform as intended throughout the anticipated operating ranges.

**Performance Qualification (PQ)**

The documented verification that systems and equipment can perform effectively and reproducibly based on the approved process method and product specification.

**Process Validation**

The documented evidence that the process, operated within established parameters, can perform effectively and reproducibly to produce a medicinal product meeting its predetermined specifications and quality attributes.

**Product realisation**

Achievement of a product with the quality attributes to meet the needs of patients, health care professionals and regulatory authorities and internal customer requirements. (ICH Q10)

**Prospective Validation**

Validation carried out before routine production of products intended for sale.

---

**Quality by design**

A systematic approach that begins with predefined objectives and emphasises product and process understanding and process control, based on sound science and quality risk management.

**Quality risk management**

A systematic process for the assessment, control, communication and review of risks to quality across the lifecycle. (ICH Q9)

**Simulated agents**

A material that closely approximates the physical and, where practical, the chemical characteristics, e.g. viscosity, particle size, pH etc., of the product under validation.

**State of control**

A condition in which the set of controls consistently provides assurance of acceptable process performance and product quality.

**Traditional approach**

A product development approach where set points and operating ranges for process parameters are defined to ensure reproducibility.

**User requirements Specification (URS)**

The set of owner, user, and engineering requirements necessary and sufficient to create a feasible design meeting the intended purpose of the system.

**Worst Case**

A condition or set of conditions encompassing upper and lower processing limits and circumstances, within standard operating procedures, which pose the greatest chance of product or process failure when compared to ideal conditions. Such conditions do not necessarily induce product or process failure.

---

## ANNEX 16

# CERTIFICATION BY THE AUTHORISED PERSON AND BATCH RELEASE

## SCOPE

This Annex provides guidance on the certification by an Authorised Person and on batch release of medicinal products for human or veterinary use within a Pharmaceutical Inspection Co-operation Scheme (PIC/S) Participating Authority or made for export. The principles of this guidance also apply to investigational medicinal products (IMP) for human use, subject to any difference in the legal provisions and more specific guidance published by PIC/S Participating Authorities under national law.

Guidance in this Annex on the certification of batches by a manufacturer of a medicinal product is within the scope of the Pharmaceutical Inspection Co-operation Scheme. However, each PIC/S Participating Authority may decide whether guidance expressed in this annex should become a legally-binding standard in relation to imported medicinal products.

This Annex does not address any controls on release of medicinal products by a National Competent Authority under national law (e.g. certain blood and immunological products); however, this Annex does apply to the Authorised Person certification and subsequent release of such batches.

The basic arrangements for batch release for a medicinal product are defined by its marketing authorisation (MA). Nothing in this Annex should be taken as overriding those arrangements.

## GENERAL PRINCIPLES

The ultimate responsibility for the performance of a medicinal product over its lifetime, its safety, quality and efficacy, lies with the marketing authorisation holder (MAH).

However, the Authorised Person is responsible for ensuring that each individual batch has been manufactured and checked in compliance with national requirements in accordance with the requirements of the marketing authorisation (MA) and with Good Manufacturing Practice (GMP).

The process of batch release comprises of:

- i. The checking of the manufacture and testing of the batch in accordance with defined release procedures.
- ii. The certification of the finished product batch performed by an Authorised Person signifying that the batch is in compliance with GMP and the requirements of its MA. This represents the quality release of the batch.
- iii. The transfer to saleable stock, and/or export of the finished batch of

product which should take into account the certification performed by the Authorised Person. If this transfer is performed at a site other than that where certification takes place, then the arrangement should be documented in a written agreement between the sites.

The purpose of controlling batch release is notably to ensure that:

- i. The batch has been manufactured and checked in accordance with the requirements of its MA.
- ii. The batch has been manufactured and checked in accordance with the principles and guidelines of GMP.
- iii. Any other relevant legal requirements are taken into account.
- iv. In the event that a quality defect as referred to in Chapter 8 of PIC/S GMP Guide, Part I, needs to be investigated or a batch recalled, to ensure that any Authorised Persons involved in the certification or confirmation<sup>1</sup> and any relevant records are readily identifiable.

## **1. THE PROCESS OF CERTIFICATION**

- 1.1. Each batch of finished product must be certified<sup>2</sup> by an Authorised Person before being released for sale, supply or export. Certification can only be performed by an Authorised Person of the manufacturer and/or importer which are described in the MA.
- 1.2. Any Authorised Person involved in the certification or confirmation of a batch must have detailed knowledge of the steps for which they are taking responsibility. The Authorised Persons should be able to prove their continuous training regarding the product type, production processes, technical advances and changes to GMP.
- 1.3. There may be several sites involved in the various stages of manufacture, importation, testing and storage of a batch before it undergoes certification. Regardless of how many sites are involved, the Authorised Person performing certification of the finished product must ensure that all necessary steps have been completed under accepted pharmaceutical quality systems to assure compliance of the batch with GMP, the MA and any other national requirements where certification is taking place.

---

<sup>1</sup> Information required for the confirmation, where Authorised Person responsibilities for the batch are being transferred between sites, is recommended in Appendix I to this Annex.

<sup>2</sup> The contents of a batch certificate for medicinal products are recommended in Appendix II to this Annex. The content of a batch certificate may differ from Appendix II as required under national law or as required to facilitate arrangements between National Competent Authorities.

- 1.4. Each manufacturing site must have at least one Authorised Person.
  - 1.4.1 Where the site only undertakes partial manufacturing operations in relation to a batch, then an Authorised Person at that site must at least confirm that the operations undertaken by the site have been performed in accordance with GMP and the terms of the written agreement detailing the operations for which the site is responsible. If the Authorised Person is responsible for providing confirmation of compliance for those operations with the relevant MA, then the Authorised Person should have access to the necessary details of the MA.
  - 1.4.2 The Authorised Person who performs certification of the finished product batch should assume full responsibility for all stages of manufacture of the batch or this responsibility may be shared with other Authorised Persons who have provided confirmation for specified steps in the manufacture and control of a batch. These could be other Authorised Persons who are operating under the same manufacturing authorisation holder or operating under different manufacturing authorisation holders
  - 1.4.3 Any sharing of responsibilities amongst Authorised Persons in relation to compliance of a batch must be defined in a written agreement. This document should detail responsibility for assessment of the impact any deviation(s) has/have on compliance of the batch with GMP and the MA.
- 1.5 For medicinal products manufactured outside the jurisdiction of a National Competent Authority, physical importation and certification are the final stages of manufacturing which precede the transfer to saleable stock of the batch, depending on national law.
  - 1.5.1 The process of certification as described in Section 1 of this Annex, applies to all medicinal products intended to be released within domestic markets, or for export, irrespective of the complexity of the supply chain and the global locations of manufacturing sites involved.
  - 1.5.2 In accordance with the principles described in Section 1.4 of this Annex and the law in each jurisdiction, the Authorised Person certifying the finished medicinal product batch may take account of the confirmation by, and share defined responsibilities with, other Authorised Persons in relation to any manufacturing or importation operations taking place at other sites in the same jurisdiction and other manufacturing authorisation holders defined in the relevant MA.
  - 1.5.3 Conditions of storage and transport for the batch and the sample, if sent separately, should be taken into account by the Authorised Person before certification of a batch.
  - 1.5.4 The Authorised Person certifying the finished product is responsible for ensuring that each finished medicinal product batch has been manufactured in accordance with GMP and the MA. The Authorised Person is also responsible for ensuring that the finished medicinal product batch has undergone testing required upon importation in accordance with national law.
  - 1.5.5 If sampling of imported product is necessary, it should be fully representative of the batch. Samples may either be taken after arrival in the jurisdiction of the National Competent Authority, or be taken at the manufacturing site located in



another jurisdiction in accordance with national law and a technically justified approach which is documented within the company's quality system. Responsibilities in relation to the sampling should be defined in a written agreement between the sites. Any samples taken outside the National Competent Authority jurisdiction should be shipped under equivalent transport conditions as the batch that they represent.

1.5.6 Where sampling is performed at a manufacturing site located in another jurisdiction, the technical justification should include a formal Quality Risk Management process to identify and manage any risks associated with this approach. This should be fully documented and include at least the following elements:

- i. Audit of the manufacturing activity including any sampling activity in the other jurisdiction and evaluation of subsequent transportation steps of both the batch and samples to ensure that the samples are representative of the imported batch.
- ii. A comprehensive scientific study, including data to support any conclusions that samples taken in the other jurisdiction are representative of the batch after importation. This study should at least include:
  - description of the sampling process in the other jurisdiction;
  - description of the transported conditions of the sample and the imported batch. Any differences should be justified;
  - comparative analysis of samples taken in the other jurisdiction and samples taken after importation; and
  - consideration of the time interval between sampling and importation of the batch and generation of data to support appropriate defined limits.
- iii. Provision for random periodic analysis of samples taken after importation to justify ongoing reliance on samples taken in another jurisdiction.
- iv. A review of any unexpected result or confirmed out of specification result. These may have implications for reliance on sampling performed at a manufacturing site located in another jurisdiction and should be notified to the National Competent Authority for the site where certification is performed. Such an occurrence should be regarded as a potential quality defect and investigated in line with the guidance in Chapter 8 of the PIC/S GMP Guide, Part I.

1.5.7 Different imported finished product batches may originate from the same bulk product batch. If testing upon importation is required (see 1.5.4), the Authorised Person(s) certifying the different finished product batches may base their decision on the quality control testing of the first imported finished batch provided that a justification has been documented based on Quality Risk Management principles. This should take into account the provisions of paragraph 1.5.6 in relation to reliance on any samples taken in another jurisdiction. Evidence should be available to ensure that the integrity and identity of the imported finished product batch has been established through documented verification of at least the following:

- i. relevant requirements for storage of the bulk product prior to packaging have been satisfied;

- ii. the finished product batch has been stored and transported under the required conditions;
  - iii. the consignment has remained secure and there is no evidence of tampering during storage or transportation;
  - iv. correct identification of the product has been established; and
  - v. the sample(s) tested are representative of all finished product batches derived from the bulk batch.
- 1.6 The Authorised Person must ensure that the following operational responsibilities are fulfilled prior to certification of a batch:
- i. Certification is permitted under the terms of any authorisation by the national competent authority.
  - ii. Any additional duties and requirements of national law are complied with.
  - iii. Certification is recorded in accordance with this Annex and in accordance to national law.
- 1.7 In addition, the Authorised Person has responsibility for ensuring points 1.7.1 to 1.7.21 are secured. These tasks may be delegated to appropriately trained personnel or third parties. It is recognised that the Authorised Person will need to rely on the pharmaceutical quality system and the Authorised Person should have on-going assurance that this reliance is well founded.
- 1.7.1 All activities associated with manufacture and testing of the medicinal product have been conducted in accordance with the principles and guidelines of GMP.
- 1.7.2 The entire supply chain of the active substance and medicinal product up to the stage of certification is documented and available for the Authorised Person. This should include the manufacturing sites of the starting materials and packaging materials for the medicinal product and any other materials deemed critical through a risk assessment of the manufacturing process. The document should preferably be in the format of a comprehensive diagram, where each party, including subcontractors of critical steps such as the sterilisation of components and equipment for aseptic processing, are included.
- 1.7.3 All audits of sites involved in the manufacture and the testing of the medicinal products and in the manufacture of the active substance have been carried out and that the audit reports are available to the Authorised Person performing the certification.
- 1.7.4 All sites of manufacture, analysis and certification are compliant with the terms of the MA for the intended jurisdiction.
- 1.7.5 All manufacturing activities and testing activities are consistent with those described in the MA.
- 1.7.6 The source and specifications of starting materials and packaging materials used in the batch are compliant with the MA. Supplier quality management systems are in place that ensures only materials of the required quality have been supplied.
- 1.7.7 For medicinal products, the active substances have been manufactured in accordance with GMP and, where required, distributed in accordance with Good Distribution Practice (GDP) for Active Substances.

- 1.7.8 Active substances used in the manufacture of medicinal products for human use shall only be imported if the active substances comply with the following requirements:
- i. the active substances have been manufactured in accordance with standards of GMP and, where applicable, distributed in accordance with Good Distribution Practice according to national law; and
  - ii. there is evidence of GMP compliance of the manufacturer of the active substance in accordance to national law.
- 1.7.9 The excipients used to manufacture a medicinal product have been manufactured with an appropriate good manufacturing practice. Where applicable, this shall be in accordance with PI 045-1: Guidelines on the formalised risk assessment for ascertaining the appropriate good manufacturing practice for excipients of medicinal products for human use.
- 1.7.10 When relevant, the TSE (Transmissible Spongiform Encephalopathy) status of all materials used in batch manufacture is compliant with the terms of the MA.
- 1.7.11 All records are complete and endorsed by appropriate personnel. All required in-process controls and checks have been made.
- 1.7.12 All manufacturing and testing processes remain in the validated state. Personnel are trained and qualified as appropriate.
- 1.7.13 Finished product quality control (QC) test data complies with the Finished Product Specification described in the MA, or where authorised, the Real Time Release Testing programme.
- 1.7.14 Any regulatory post-marketing commitments relating to manufacture or testing of the product have been addressed. On-going stability data continues to support certification.
- 1.7.15 The impact of any change to product manufacturing or testing has been evaluated and any additional checks and tests are complete.
- 1.7.16 All investigations pertaining to the batch being certified (including out of specification and out of trend investigations) have been completed to a sufficient level to support certification.
- 1.7.17 A batch should not be certified if there are any on-going complaints, investigations or recalls that may have impact on the batch.
- 1.7.18 The required technical agreements are in place.
- 1.7.19 The self-inspection programme is active and current.
- 1.7.20 The appropriate arrangements for distribution and shipment are in place.
- 1.7.21 Where required in national law, safety features have been affixed to the packaging enabling wholesale distributors and persons authorised or entitled to supply medicinal products to the public to:
- i. verify the authenticity of the medicinal product;
  - ii. identify individual packs; and
  - iii. verify, via a device, of whether the outer packaging has been tampered with.

- 1.8 For certain products, special guidance may apply, such as PIC/S GMP Guide Annex 2: Manufacture of Biological active substances and Medicinal Products for Human Use, and Annex 3: Manufacture of Radiopharmaceuticals.
- 1.9 In the case of parallel importation and parallel distribution, any repackaging operation carried out on a batch which has already been released must be approved by the competent authority of the intended market, as applicable under national law.
- 1.9.1 Prior to certification of a repacked batch the Authorised Person should confirm compliance with national requirements for parallel importation and rules for parallel distribution.
- 1.9.2 The Authorised Person, who is responsible for the certification of the batch in the MA of the repackaged finished product, certifies that the repackaging has been performed in accordance with the relevant authorisation pertaining to the repackaged product and GMP.
- 1.10 Recording of Authorised Person certification:
- 1.10.1 The certification of a medicinal product is recorded by the Authorised Person in the document provided for that purpose. The record should show that each production batch satisfies the following provisions:
- i. Each batch of medicinal products has been manufactured and checked in compliance with national law and in accordance with the requirements of the marketing authorisation.
  - ii. In the case of medicinal products coming from another jurisdiction each production batch has a full qualitative analysis, a quantitative analysis of at least all the active substances and all the other tests or checks necessary to ensure the quality of medicinal products in accordance with the requirements of the marketing authorisation. Such testing is also performed in the importing country where required in national law.
  - iii. In the case of medicinal products imported from another jurisdiction, where appropriate arrangements have been made with the exporting jurisdiction to ensure that the manufacturer of the medicinal product applies standards of good manufacturing practice at least equivalent to those laid down by the national competent authority, and to ensure that the controls referred to under point (ii) have been carried out in the exporting country, the authorised person may be relieved of responsibility for carrying out those controls.
  - iv. The record must be kept up to date as operations are carried out and must remain at the disposal of the agents of the National Competent Authority the longer of one year after expiry of the batch or five years unless otherwise specified in national law.
- 1.10.2 The control report referred to in 1.10.1 or another proof for release for sale, supply, or export, based on an equivalent system, should be made available for the batch in order to be exempted from further controls when entering another National Competent Authority jurisdiction.

## **2. RELYING ON GMP ASSESSMENTS BY THIRD PARTIES, E.G. AUDITS**

In some cases the Authorised Person will rely on the correct functioning of the pharmaceutical quality system of sites involved in the manufacture of the product and this may be derived from audits conducted by third parties.

- 2.1 Relying on assessment by third parties, e.g. audits should be in accordance with Chapter 7 of the PIC/S GMP Guide in order to appropriately define, agree and control any outsourced activity.
- 2.2 Special focus should be given to the approval of audit reports:
  - i. The audit report should address general GMP requirements, as for example the quality management system, all relevant production and quality control procedures related to the supplied product, e.g. active substance manufacturing, quality control testing, primary packaging, etc. All audited areas should be accurately described resulting in a detailed report of the audit.
  - ii. It should be determined whether the manufacture and quality control of the active substance and medicinal product complies with GMP or in case of manufacture in another jurisdiction, GMP at least equivalent to that of each National Competent Authority.
  - iii. In case of outsourced activities compliance with the MA should be verified.
  - iv. The Authorised Person should ensure that a written final assessment and approval of third party audit reports have been made. The Authorised Person should have access to all documentation which facilitates review of the audit outcome and continued reliance on the outsourced activity.
  - v. Outsourced activities with critical impact on product quality should be defined in accordance with the principles of Quality Risk Management as described in Annex 20 of the PIC/S GMP Guide. According to this, the Authorised Person should be aware of the outcome of an audit with critical impact on the product quality before certifying the relevant batches.
  - vi. Repeated audits should be performed in accordance with the principles of Quality Risk Management.

## **3. HANDLING OF UNEXPECTED DEVIATIONS**

Provided registered specifications for active substances, excipients, packaging materials and medicinal products are met, an Authorised Person may consider confirming compliance or certifying a batch where an unexpected deviation concerning the manufacturing process and/or the analytical control methods from details contained within the MA and/or GMP has occurred. The deviation should be thoroughly investigated and the root cause corrected. This may require the submission of a variation to the MA for the continued manufacture of the product.

- 3.1 The impact of the deviation should be assessed in accordance with a quality risk management process using an appropriate approach such as described in Annex 20 of the PIC/S GMP Guide. The quality risk management process should include the following;
  - i. Evaluation of the potential impact of the deviation on quality, safety or efficacy of the batch(es) concerned and conclusion that the impact is negligible.
  - ii. Consideration of the need to include the affected batch(es) in the ongoing

stability programme.

- iii. In the case of biological medicinal products, consideration that any deviations from the approved process can have an unexpected impact on safety and efficacy.

Taking account that responsibilities may be shared between more than one Authorised Person involved in the manufacture and control of a batch, the Authorised Person performing certification of a batch of medicinal product should be aware of and take into consideration any deviations which have the potential to impact compliance with GMP and/or compliance with the MA.

## 4. THE RELEASE OF A BATCH

- 4.1 Batches of medicinal products should only be released for sale or supply to the market after certification by an Authorised Person as described above. Until a batch is certified, it should remain at the site of manufacture or be shipped under quarantine to another site which has been approved for that purpose by the relevant National Competent Authority.
- 4.2 Safeguards to ensure that uncertified batches are not transferred to saleable stock should be in place and may be physical in nature, e.g. the use of segregation and labelling or electronic in nature, e.g. the use of validated computerised systems. When uncertified batches are moved from one authorised site to another, the safeguards to prevent premature release should remain.
- 4.3 The steps necessary to notify Authorised Person certification to the site where the transfer to saleable stock is to take place should be defined within a technical agreement. Such notification by an Authorised Person to the site should be formal and unambiguous and should be subject to the requirements of Chapter 4 of the PIC/S GMP Guide, Part I.
- 4.4 National law may require a specific release for the local market (market release) by the MAH which takes into consideration the certification of the finished product by the manufacturer.

## GLOSSARY TO ANNEX 16

Certain words and phrases in this annex are used with the particular meanings defined below. Reference should also be made to the Glossary in the main part of the PIC/S GMP Guide.

### **Certification of the finished product batch**

The certification in a document by an Authorised Person, as defined in this annex, and represents the quality release of the batch before the batch is released for sale or distribution.

### **Confirmation (Confirm and confirmed have equivalent meanings)**

A signed statement by an Authorised Person that a process or test has been conducted in accordance with GMP and the relevant marketing authorisation or clinical trial authorisation, product specification file and/or technical agreement, as applicable, as agreed in writing with the Authorised Person responsible for certifying the finished product batch before release. The Authorised Person providing a confirmation takes responsibility for those activities being confirmed.

### **Finished product batch**

With reference to the control or test of the finished product, a finished medicinal product

batch is an entity which comprises all the units of a pharmaceutical form which are made from the same initial quantity of material and have undergone the same series of manufacturing and/or sterilisation operations or, in the case of a continuous production process, all the units manufactured in a given period of time. In the context of this annex the term in particular denotes the batch of product in its final pack for release to the market.

**Importer**

Any holder of the authorisation to import as required by national law.

**Jurisdiction**

A jurisdiction is a territory within which a court or government agency is exercising its power. A jurisdiction can be e.g. a State (whether internationally recognised or not) or a region.

## APPENDIX I

### Recommended content of the confirmation of the partial manufacturing of a medicinal product

[LETTER HEAD OF MANUFACTURER WHO CARRIED OUT THE MANUFACTURING ACTIVITY]

1. Name of the product and description of the manufacturing stage (e.g. paracetamol 500 mg tablets, primary packaging into blister packs).
2. Batch number.
3. Name and address of the site carrying out the partial manufacturing.
4. Reference to the Technical Quality Agreement (in accordance with Chapter 7 of the PIC/S GMP Guide).
5. Confirmation statement.

I hereby confirm that the manufacturing stages referred to in the Technical Quality Agreement have been carried out in full compliance with the GMP requirements of the [insert jurisdiction] and the terms described in the Agreement for ensuring compliance with the requirements of the Marketing Authorisation(s) as provided by [Contract Giver/manufacturer certifying and releasing the batch].

6. Name of the Authorised Person confirming the partial manufacturing.
7. Signature of Authorised Person confirming the partial manufacturing.
8. Date of signature.



## APPENDIX II

### Recommended content of the Batch Certificate for Medicinal Products

[LETTER HEAD OF THE BATCH CERTIFYING AND RELEASING MANUFACTURER]

1. Name, strength/potency, dosage form and package size (identical to the text on the finished product package).
2. Batch number of the finished product.
3. Name of the destination country/countries of the batch.
4. Certification statement.

I hereby certify that all the manufacturing stages of this batch of finished product have been carried out in full compliance with the GMP requirements of the [insert jurisdiction] and [as applicable] with the requirements of the Marketing Authorisation(s) of the destination country/countries.

5. Name of the Authorised Person certifying the batch.
6. Signature of the Authorised Person certifying the batch.
7. Date of signature.

## ANNEX 17

# REAL TIME RELEASE TESTING AND PARAMETRIC RELEASE

## 1. PRINCIPLE

- 1.1 Medicinal products must comply with their approved specifications and subject to compliance with GMP, can normally be released to market by performing a complete set of tests on active substances and/or finished products as defined in the relevant marketing authorisation or clinical trial authorisation. In specific circumstances, where authorised, based on product knowledge and process understanding, information collected during the manufacturing process can be used instead of end-product testing for batch release. Any separate activities required for this form of batch release should be integrated into the Pharmaceutical Quality System (PQS).

## 2. SCOPE

- 2.1 This document is intended to outline the requirements for application of Real Time Release Testing (RTRT) and parametric release, where the control of critical parameters and relevant material attributes are authorised as an alternative to routine end-product testing of active substances and/or finished products. A specific aim of this guideline is to incorporate the application of RTRT to any stage in the manufacturing process and to any type of finished products or active substances, including their intermediates.

## 3. REAL TIME RELEASE TESTING (RTRT)

- 3.1 Under RTRT, a combination of in-process monitoring and controls may provide, when authorised, a substitute for end-product testing as part of the batch release decision. Interaction with all relevant regulatory authorities prior and during the assessment process preceding regulatory approval is required. The level of interaction will depend on the level of complexity of the RTRT control procedure applied on site.
- 3.2 When designing the RTRT strategy, the following minimum criteria are expected to be established and met:
- (i) Real time measurement and control of relevant in-process material attributes and process parameters should be accurate predictors of the corresponding finished product attributes.
  - (ii) The valid combination of relevant assessed material attributes and process controls to replace finished product attributes should be established with scientific evidence based on material, product and process knowledge.
  - (iii) The combined process measurements (process parameters and material attributes) and any other test data generated during the manufacturing process should provide a robust foundation for RTRT and the batch release decision.

- 3.3 A RTRT strategy should be integrated and controlled through the PQS. This should include or reference information at least of the following:
- quality risk management, including a full process related risk assessment, in accordance with the principles described in the PIC/S Guide to Good Manufacturing Practice for Medicinal Products, Part I Chapter 1 and Part II Chapter 2,
  - change control program,
  - control strategy,
  - specific personnel training program,
  - qualification and validation policy,
  - deviation/CAPA system,
  - contingency procedure in case of a process sensor/equipment failure,
  - periodic review/assessment program to measure the effectiveness of the RTRT plan for continued assurance of product quality.
- 3.4 In accordance with the principles described in the PIC/S Guide to Good Manufacturing Practice for Medicinal Products, Part I Chapter 1, Part II Chapter 13 and Annex 15, the change control program is an important part of the real time release testing approach. Any change that could potentially impact product manufacturing and testing, or the validated status of facilities, systems, equipment, analytical methods or processes, should be assessed for risk to product quality and impact on reproducibility of the manufacturing process. Any change should be justified by the sound application of quality risk management principles, and fully documented. After change implementation, an evaluation should be undertaken to demonstrate that there are no unintended or deleterious impact on product quality.
- 3.5 A control strategy should be designed not only to monitor the process, but also to maintain a state of control and ensure that a product of the required quality will be consistently produced. The control strategy should describe and justify the selected in-process controls, material attributes and process parameters which require to be routinely monitored and should be based on product, formulation and process understanding. The control strategy is dynamic and may change throughout the lifecycle of the product requiring the use of a quality risk management approach and of knowledge management. The control strategy should also describe the sampling plan and acceptance/rejection criteria.
- 3.6 Personnel should be given specific training on RTRT technologies, principles and procedures. Key personnel should demonstrate adequate experience, product and process knowledge and understanding. Successful implementation of RTRT requires input from a cross-functional/multi-disciplinary team with relevant experience on specific topics, such as engineering, analytics, chemometric modeling or statistics.
- 3.7 Important parts of the RTRT strategy are validation and qualification policy, with particular reference to advanced analytical methods. Particular attention should be focused on the qualification, validation and management of in-line and on-line analytical methods, where the sampling probe is placed within the manufacturing equipment.
- 3.8 Any deviation or process failure should be thoroughly investigated and any adverse trending indicating a change in the state of control should be followed up appropriately.
- 3.9 Continuous learning through data collection and analysis over the life cycle of a

product is important and should be part of the PQS. With advances in technology, certain data trends, intrinsic to a currently acceptable process, may be observed. Manufacturers should scientifically evaluate the data, in consultation if appropriate, with the regulatory authorities, to determine how or if such trends indicate opportunities to improve quality and/or consistency.

- 3.10 When RTRT has been approved, this approach should be routinely used for batch release. In the event that the results from RTRT fail or are trending toward failure, a RTRT approach may not be substituted by end-product testing. Any failure should be thoroughly investigated and considered in the batch release decision depending on the results of these investigations, and must comply with the content of the marketing authorisation and GMP requirements. Trends should be followed up appropriately.
- 3.11 Attributes (e.g. uniformity of content) that are indirectly controlled by approved RTRT should still appear in the Certificate of Analysis for batches. The approved method for testing the end-product should be mentioned and the results given as “Complies if tested” with a footnote: “Controlled by approved Real Time Release Testing”.

#### **4. PARAMETRIC RELEASE AND STERILISATION**

- 4.1 This section provides guidance on parametric release which is defined as the release of a batch of terminally sterilised product based on a review of critical process control parameters rather than requiring an end-product testing for sterility.
- 4.2 An end-product test for sterility is limited in its ability to detect contamination as it utilises only a small number of samples in relation to the overall batch size, and secondly, culture media may only stimulate growth of some, but not all, microorganisms. Therefore, an end-product testing for sterility only provides an opportunity to detect major failures in the sterility assurance system (i.e. a failure that results in contamination of a large number of product units and/or that result in contamination by the specific microorganisms whose growth is supported by the prescribed media). In contrast, data derived from in-process controls (e.g. pre-sterilisation product bioburden or environmental monitoring) and by monitoring relevant sterilisation parameters can provide more accurate and relevant information to support sterility assurance of the product.
- 4.3 Parametric release can only be applied to products sterilised in their final container using either moist heat, dry heat or ionising radiation (dosimetric release).
- 4.4 To utilise this approach, the manufacturer should have a history of acceptable GMP compliance and a robust sterility assurance program in place to demonstrate consistent process control and process understanding.
- 4.5 The sterility assurance program should be documented and include, at least, the identification and monitoring of the critical process parameters, steriliser cycle development and validation, container/packaging integrity validation, bioburden control, environmental monitoring program, product segregation plan, equipment, services and facility design and qualification program, maintenance and calibration program, change control program, personnel training, and incorporate a quality risk management approach.
- 4.6 Risk management is an essential requirement for parametric release and should focus on mitigating the factors which increase the risk of failure to achieve and

maintain sterility in each unit of every batch. If a new product or process is being considered for parametric release, then a risk assessment should be conducted during process development including an evaluation of production data from existing products if applicable. If an existing product or process is being considered, the risk assessment should include an evaluation of any historical data generated.

- 4.7 Personnel involved in the parametric release process should have experience in the following areas: microbiology, sterility assurance, engineering, production and sterilisation. The qualifications, experience, competency and training of all personnel involved in parametric release should be documented.
- 4.8 Any proposed change which may impact on sterility assurance should be recorded in the change control system and reviewed by appropriate personnel who are qualified and experienced in sterility assurance.
- 4.9 A pre-sterilisation bio-burden monitoring program for the product and components should be developed to support parametric release. The bioburden should be performed for each batch. The sampling locations of filled units before sterilization should be based on a worst-case scenario and be representative of the batch. Any organisms found during bioburden testing should be identified to confirm that they are not spore forming which may be more resistant to the sterilising process.
- 4.10 Product bio-burden should be minimised by appropriate design of the manufacturing environment and the process by:
- good equipment and facility design to allow effective cleaning, disinfection and sanitisation;
  - availability of detailed and effective procedures for cleaning, disinfection and sanitisation;
  - use of microbial retentive filters where possible;
  - availability of operating practices and procedures which promote personnel hygiene and enforce appropriate garment control;
  - appropriate microbiological specifications for raw materials, intermediates and process aids (e.g. gases)
- 4.11 For aqueous or otherwise microbiologically unstable products, the time lag between dissolving the starting materials, product fluid filtration, and sterilisation should be defined in order to minimise the development of bioburden and an increase in endotoxins (if applicable).

### **Sterilisation Process**

- 4.12 Qualification and validation are critical activities to assure that sterilisation equipment can consistently meet cycle operational parameters and that the monitoring devices provide verification of the sterilisation process.
- 4.13 Periodic requalification of equipment and revalidation of processes should be planned and justified in accordance with the requirements of the PIC/S Guide to Good Manufacturing Practice for Medicinal Products Annexes 1 and 15.
- 4.14 Appropriate measurement of critical process parameters during sterilisation is a critical requirement in a parametric release program. The standards used for process measuring devices should be specified and the calibration should be traceable to national or international standards.
- 4.15 Critical process parameters should be established, defined and undergo periodic

re-evaluation. The operating ranges should be developed based on sterilisation process, process capability, calibration tolerance limits and parameter criticality.

- 4.16 Routine monitoring of the steriliser should demonstrate that the validated conditions necessary to achieve the specified process is achieved in each cycle. Critical processes should be specifically monitored during the sterilisation phase.
- 4.17 The sterilisation record should include all the critical process parameters. The sterilisation records should be checked for compliance to specification by at least two independent systems. These systems may consist of two people or a validated computer system plus a person.
- 4.18 Once parametric release has been approved by the regulatory authorities, decisions for release or rejection of a batch should be based on the approved specifications and the review of critical process control data. Routine checks of the steriliser, changes, deviations, unplanned and routine planned maintenance activities should be recorded, assessed and approved before releasing the products to the market. Non-compliance with the specification for parametric release cannot be overruled by a finished product passing the test for sterility.

## 5. GLOSSARY

### **Control strategy**

A planned set of controls, derived from current product and process understanding that ensures process performance and product quality. The controls can include parameters and attributes related to drug substance and drug product materials and components, facility and equipment operating conditions, in-process controls, finished product specifications, and the associated methods and frequency of monitoring and control.

### **Critical Process Parameters:**

A process parameter whose variability has an impact on a critical quality attribute and therefore should be monitored or controlled to ensure the process produces the desired quality [ICH Q8 (R2)].

### **Critical Quality Attributes**

A physical, chemical, biological, or microbiological property or characteristic that should be within an appropriate limit, range, or distribution to ensure the desired product quality. [ICH Q8 (R2)]

### **Parametric release**

One form of RTRT. Parametric release for terminally sterilised product is based on the review of documentation on process monitoring (e.g. temperature, pressure, time for terminal sterilisation) rather than the testing of a sample for a specific attribute (ICH Q8 Q&A).

### **Real time release testing**

The ability to evaluate and ensure the quality of in-process and/or final product based on process data, which typically include a valid combination of measured material attributes and process controls. (ICH Q8)

### **State of Control**

A condition in which the set of controls consistently provides assurance of continued process performance and product quality. (ICH Q10)

**[ANNEX 18]**

**[GMP GUIDE FOR ACTIVE PHARMACEUTICAL  
INGREDIENTS]<sup>1</sup>**

---

<sup>1</sup> The EU first adopted the ICH GMP Guide on APIs as Annex 18 to the EU GMP Guide while PIC/S adopted it as a stand-alone GMP Guide (PE 007). The Guide has now been adopted as Part II of the PIC/S GMP Guide (see PE 009 (Part II)).

## ANNEX 19

# REFERENCE AND RETENTION SAMPLES

## 1. SCOPE

- 1.1 This Annex to the Guide to Good Manufacturing Practice for Medicinal Products (“the GMP Guide”) gives guidance on the taking and holding of reference samples of starting materials, packaging materials or finished products and retention samples of finished products.
- 1.2 Specific requirements for investigational medicinal products are given in Annex 13 to the Guide.
- 1.3 This annex also includes guidance on the taking of retention samples for parallel imported / distributed medicinal products.

## 2. PRINCIPLE

- 2.1 Samples are retained to fulfil two purposes; firstly, to provide a sample for analytical testing and secondly to provide a specimen of the fully finished product. Samples may therefore fall into two categories:

*Reference sample:* a sample of a batch of starting material, packaging material or finished product which is stored for the purpose of being analyzed should the need arise during the shelf life of the batch concerned. Where stability permits, reference samples from critical intermediate stages (e.g. those requiring analytical testing and release) or intermediates that are transported outside of the manufacturer’s control should be kept.

*Retention sample:* a sample of a fully packaged unit from a batch of finished product. It is stored for identification purposes. For example, presentation, packaging, labelling, patient information leaflet, batch number, expiry date should the need arise during the shelf life of the batch concerned. There may be exceptional circumstances where this requirement can be met without retention of duplicate samples e.g. where small amounts of a batch are packaged for different markets or in the production of very expensive medicinal products.

For finished products, in many instances the reference and retention samples will be presented identically, i.e. as fully packaged units. In such circumstances, reference and retention samples may be regarded as interchangeable.

- 2.2 It is necessary for the manufacturer, importer or site of batch release, as specified under section 7 and 8, to keep reference and/or retention samples from each batch of finished product and, for the manufacturer to keep a reference sample from a batch of starting material (subject to certain exceptions – see 3.2 below) and/or intermediate product. Each packaging site should keep reference samples of each batch of primary and printed packaging materials. Availability of printed



materials as part of the reference and/or retention sample of the finished product can be accepted.

- 2.3 The reference and/or retention samples serve as a record of the batch of finished product or starting material and can be assessed in the event of, for example, a dosage form quality complaint, a query relating to compliance with the marketing authorisation, a labelling/packaging query or a pharmacovigilance report.
- 2.4 Records of traceability of samples should be maintained and be available for review by competent authorities.

### **3. DURATION OF STORAGE**

- 3.1 Reference and retention samples from each batch of finished product should be retained for at least one year after the expiry date. The reference sample should be contained in its finished primary packaging or in packaging composed of the same material as the primary container in which the product is marketed (for veterinary medicinal products other than immunologicals, see also Annex 4, paragraphs 8 and 9).
- 3.2 Unless a longer period is required under the law of the country of manufacture (whose competent authority is a PIC/S Member), samples of starting materials (other than solvents, gases or water used in the manufacturing process) should be retained for at least two years after the release of product. That period may be shortened if the period of stability of the material, as indicated in the relevant specification, is shorter. Packaging materials should be retained for the duration of the shelf life of the finished product concerned.

### **4. SIZE OF REFERENCE AND RETENTION SAMPLES**

- 4.1 The reference sample should be of sufficient size to permit the carrying out, on, at least, two occasions, of the full analytical controls on the batch in accordance with the Marketing Authorisation File which has been assessed and approved by the relevant Competent Authority / Authorities. Where it is necessary to do so, unopened packs should be used when carrying out each set of analytical controls. Any proposed exception to this should be justified to, and agreed with, the relevant competent authority.
- 4.2 Where applicable, national requirements relating to the size of reference samples and, if necessary, retention samples, should be followed.
- 4.3 Reference samples should be representative of the batch of starting material, intermediate product or finished product from which they are taken. Other samples may also be taken to monitor the most stressed part of a process (e.g. beginning or end of a process). Where a batch is packaged in two, or more, distinct packaging operations, at least one retention sample should be taken from each individual packaging operation. Any proposed exception to this should be justified to, and agreed with, the relevant competent authority.
- 4.4 It should be ensured that all necessary analytical materials and equipment are still available, or are readily obtainable, in order to carry out all tests given in the specification until one year after expiry of the last batch manufactured.

## **5. STORAGE CONDITIONS**

5.1 [...] \*

5.2 Storage conditions should be in accordance with the marketing authorisation (e.g. refrigerated storage where relevant).

## **6. WRITTEN AGREEMENTS**

6.1 Where the marketing authorisation holder is not the same legal entity as the site(s) responsible for batch release, the responsibility for taking and storage of reference/retention samples should be defined in a written agreement between the two parties in accordance with Chapter 7 of the PIC/S Guide to Good Manufacturing Practice. This applies also where any manufacturing or batch release activity is carried out at a site other than that with overall responsibility for the batch and the arrangements between each different site for the taking and keeping of reference and retention samples should be defined in a written agreement.

6.2 The Authorised Person who certifies a batch for sale should ensure that all relevant reference and retention samples are accessible at all reasonable times. Where necessary, the arrangements for such access should be defined in a written agreement.

6.3 Where more than one site is involved in the manufacture of a finished product, the availability of written agreements is key to controlling the taking and location of reference and retention samples.

## **7. REFERENCE SAMPLES – GENERAL POINTS**

7.1 Reference samples are for the purpose of analysis and, therefore, should be conveniently available to a laboratory with validated methodology. For starting materials and packaging materials used for medicinal products, this is the original site of manufacture of the finished product. For finished products, this is the original site of manufacture.

7.2 [...] \*

---

\* This Section is specific to the EU GMP Guide and has not been adopted by PIC/S.

## **8. RETENTION SAMPLES – GENERAL POINTS**

- 8.1 A retention sample should represent a batch of finished products as distributed and may need to be examined in order to confirm non-technical attributes for compliance with the marketing authorisation or national legislation. The retention samples should preferably be stored at the site where the Authorised Person (AP) certifying the finished product batch is located.
- 8.2 [...] \*
- 8.3 Retention samples should be stored at the premises of an authorised manufacturer in order to permit ready access by the Competent Authority.
- 8.4 Where more than one manufacturing site is involved in the manufacture importation/packaging/testing/batch release, as appropriate of a product, the responsibility for taking and storage of retention samples should be defined in a written agreement(s) between the parties concerned.

## **9. REFERENCE AND RETENTION SAMPLES FOR PARALLEL IMPORTED / PARALLEL DISTRIBUTED PRODUCTS**

Note: This section is only applicable if the national legislation deals with parallel imported / parallel distributed products.

- 9.1 Where the secondary packaging is not opened, only the packaging material used needs to be retained, as there is no, or little, risk of product mix up.
- 9.2 Where the secondary packaging is opened, for example, to replace the carton or patient information leaflet, then one retention sample, per packaging operation, containing the product should be taken, as there is a risk of product mix-up during the assembly process. It is important to be able to identify quickly who is responsible in the event of a mix-up (original manufacturer or parallel import assembler), as it would affect the extent of any resulting recall.

## **10. REFERENCE AND RETENTION SAMPLES IN THE CASE OF CLOSEDOWN OF A MANUFACTURER**

- 10.1 Where a manufacturer closes down and the manufacturing authorisation is surrendered, revoked, or ceases to exist, it is probable that many unexpired batches of medicinal products manufactured by that manufacturer remain on the market. In order for those batches to remain on the market, the manufacturer should make detailed arrangements for transfer of reference and retention samples (and relevant GMP documentation) to an authorised storage site. The manufacturer should satisfy the Competent Authority that the arrangements for storage are satisfactory and that the samples can, if necessary, be readily accessed and analysed.

---

\* This Section is specific to the EU GMP Guide and has not been adopted by PIC/S.

10.2 If the manufacturer is not in a position to make the necessary arrangements this may be delegated to another manufacturer. The Marketing Authorisation holder (MAH) is responsible for such delegation and for the provision of all necessary information to the Competent Authority. In addition, the MAH should, in relation to the suitability of the proposed arrangements for storage of reference and retention samples, consult with the competent authority of each country in which any unexpired batch has been placed on the market.

10.3 [...] \*

---

---

\* This Section is specific to the EU GMP Guide and has not been adopted by PIC/S.

**ANNEX 20\*****QUALITY RISK MANAGEMENT****FOREWORD AND SCOPE OF APPLICATION**

1. The new GMP Annex 20 corresponds to ICH Q9 guideline on Quality Risk Management. It provides guidance on a systematic approach to quality risk management facilitating compliance with GMP and other quality requirements. It includes principles to be used and options for processes, methods and tools which may be used when applying a formal quality risk management approach.
2. To ensure coherence, GMP Part I, Chapter 1 on Quality Management, has been revised to include aspects of quality risk management within the quality system framework. A similar revision is planned for Part II of the Guide. Other sections of the GMP Guide may be adjusted to include aspects of quality risk management in future broader revisions of those sections.
3. With the revision of the chapters on quality management in GMP Parts I and II quality risk management becomes an integral part of a manufacturer's quality system. Annex 20 itself is not intended, however, to create any new regulatory expectations; it provides an inventory of internationally acknowledged risk management methods and tools together with a list of potential applications at the discretion of manufacturers.
4. It is understood that the ICH Q9 guideline was primarily developed for quality risk management of medicinal products for human use. With the implementation in Annex 20 benefits of the guideline, such as processes, methods and tools for quality risk management are also made available to the veterinary sector.
5. While the GMP guide is primarily addressed to manufacturers, the ICH Q9 guideline, has relevance for other quality guidelines and includes specific sections for regulatory agencies.
6. However, for reasons of coherence and completeness, the ICH Q9 guideline has been transferred completely into GMP Annex 20.

**INTRODUCTION**

7. *Risk management* principles are effectively utilized in many areas of business and government including finance, insurance, occupational safety, public health, pharmacovigilance, and by agencies regulating these industries. Although there are some examples of the use of *quality risk management* in the pharmaceutical industry today, they are limited and do not represent the full contributions that risk management has to offer. In addition, the importance of *quality systems* has been

---

\* This Annex is voluntary.

recognized in the pharmaceutical industry and it is becoming evident that quality risk management is a valuable component of an effective quality system.

8. It is commonly understood that *risk* is defined as the combination of the probability of occurrence of *harm* and the *severity* of that harm. However, achieving a shared understanding of the application of risk management among diverse *stakeholders* is difficult because each stakeholder might perceive different potential harms, place a different probability on each harm occurring and attribute different severities to each harm. In relation to pharmaceuticals, although there are a variety of stakeholders, including patients and medical practitioners as well as government and industry, the protection of the patient by managing the risk to quality should be considered of prime importance.
9. The manufacturing and use of a drug (medicinal) product, including its components, necessarily entail some degree of risk. The risk to its quality is just one component of the overall risk. It is important to understand that product *quality* should be maintained throughout the *product lifecycle* such that the attributes that are important to the quality of the drug (medicinal) product remain consistent with those used in the clinical studies. An effective quality risk management approach can further ensure the high quality of the drug (medicinal) product to the patient by providing a proactive means to identify and control potential quality issues during development and manufacturing. Additionally, use of quality risk management can improve the decision making if a quality problem arises. Effective quality risk management can facilitate better and more informed decisions, can provide regulators with greater assurance of a company's ability to deal with potential risks and can beneficially affect the extent and level of direct regulatory oversight.
10. The purpose of this document is to offer a systematic approach to quality risk management. It serves as a foundation or resource document that is independent of, yet supports, other ICH Quality documents and complements existing quality practices, requirements, standards, and guidelines within the pharmaceutical industry and regulatory environment. It specifically provides guidance on the principles and some of the tools of quality risk management that can enable more effective and consistent risk based decisions, both by regulators and industry, regarding the quality of drug substances and drug (medicinal) products across the product lifecycle. It is not intended to create any new expectations beyond the current regulatory requirements.
11. It is neither always appropriate nor always necessary to use a formal risk management process (using recognized tools and/ or internal procedures e.g. standard operating procedures). The use of informal risk management processes (using empirical tools and/ or internal procedures) can also be considered acceptable.
12. Appropriate use of quality risk management can facilitate but does not obviate industry's obligation to comply with regulatory requirements and does not replace appropriate communications between industry and regulators.

## SCOPE

13. This guideline provides principles and examples of tools for quality risk management that can be applied to different aspects of pharmaceutical quality. These aspects include development, manufacturing, distribution, and the inspection and submission/review processes throughout the lifecycle of drug substances, drug (medicinal) products, biological and biotechnological products (including the use of raw materials, solvents, excipients, packaging and labeling materials in drug (medicinal) products, biological and biotechnological products).

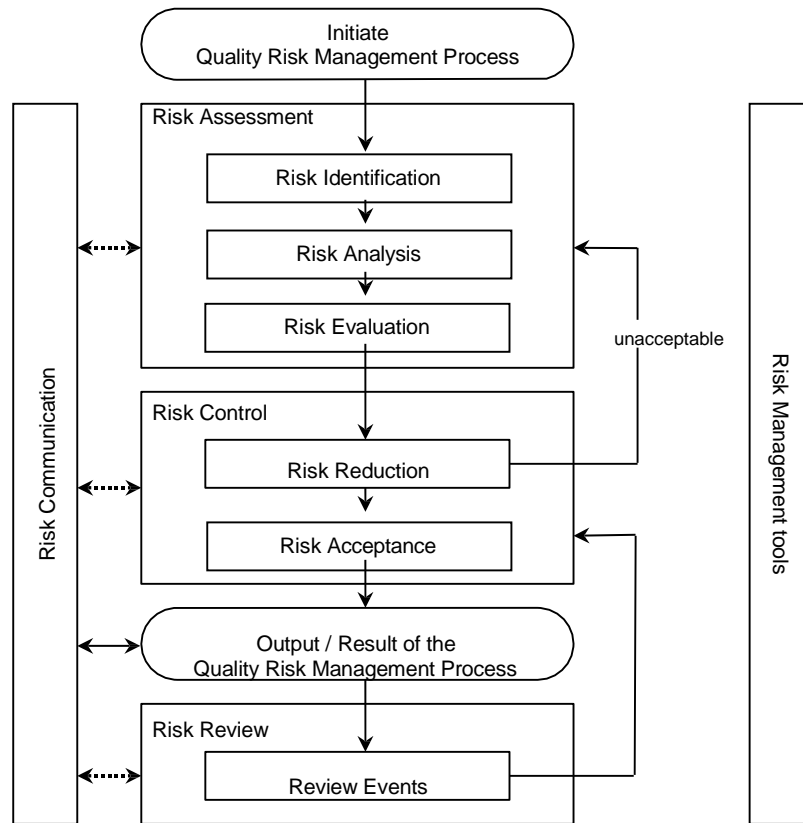
## PRINCIPLES OF QUALITY RISK MANAGEMENT

14. Two primary principles of quality risk management are:
- The evaluation of the risk to quality should be based on scientific knowledge and ultimately link to the protection of the patient; and
  - The level of effort, formality and documentation of the quality risk management process should be commensurate with the level of risk.

## GENERAL QUALITY RISK MANAGEMENT PROCESS

15. Quality risk management is a systematic process for the assessment, control, communication and review of risks to the quality of the drug (medicinal) product across the product lifecycle. A model for quality risk management is outlined in the diagram (Figure 1). Other models could be used. The emphasis on each component of the framework might differ from case to case but a robust process will incorporate consideration of all the elements at a level of detail that is commensurate with the specific risk.

Figure 1: Overview of a typical quality risk management process



16. Decision nodes are not shown in the diagram above because decisions can occur at any point in the process. These decisions might be to return to the previous step and seek further information, to adjust the risk models or even to terminate the risk management process based upon information that supports such a decision. Note: “unacceptable” in the flowchart does not only refer to statutory, legislative or regulatory requirements, but also to the need to revisit the risk assessment process.

### Responsibilities

17. Quality risk management activities are usually, but not always, undertaken by interdisciplinary teams. When teams are formed, they should include experts from the appropriate areas (e.g. quality unit, business development, engineering, regulatory affairs, production operations, sales and marketing, legal, statistics and clinical) in addition to individuals who are knowledgeable about the quality risk management process.
18. Decision *makers* should:
- take responsibility for coordinating quality risk management across various functions and departments of their organization; and
  - assure that a quality risk management process is defined, deployed and reviewed and that adequate resources are available.



## Initiating a Quality Risk Management Process

19. Quality risk management should include systematic processes designed to coordinate, facilitate and improve science-based decision making with respect to risk. Possible steps used to initiate and plan a quality risk management process might include the following:
- Define the problem and/or risk question, including pertinent assumptions identifying the potential for risk
  - Assemble background information and/ or data on the potential hazard, harm or human health impact relevant to the risk assessment
  - Identify a leader and necessary resources
  - Specify a timeline, deliverables and appropriate level of decision making for the risk management process

## Risk Assessment

20. Risk assessment consists of the identification of hazards and the analysis and evaluation of risks associated with exposure to those hazards (as defined below). Quality risk assessments begin with a well-defined problem description or risk question. When the risk in question is well defined, an appropriate risk management tool (see examples in section 5) and the types of information needed to address the risk question will be more readily identifiable. As an aid to clearly defining the risk(s) for risk assessment purposes, three fundamental questions are often helpful:
1. What might go wrong?
  2. What is the likelihood (probability) it will go wrong?
  3. What are the consequences (severity)?

**Risk identification** is a systematic use of information to identify hazards referring to the risk question or problem description. Information can include historical data, theoretical analysis, informed opinions, and the concerns of stakeholders. Risk identification addresses the “What might go wrong?” question, including identifying the possible consequences. This provides the basis for further steps in the quality risk management process.

22. **Risk analysis** is the estimation of the risk associated with the identified hazards. It is the qualitative or quantitative process of linking the likelihood of occurrence and severity of harms. In some risk management tools, the ability to detect the harm (detectability) also factors in the estimation of risk.
23. **Risk evaluation** compares the identified and analyzed risk against given risk criteria. Risk evaluations consider the strength of evidence for all three of the fundamental questions.
24. In doing an effective risk assessment, the robustness of the data set is important because it determines the quality of the output. Revealing assumptions and reasonable sources of uncertainty will enhance confidence in this output and/or help identify its limitations. Uncertainty is due to combination of incomplete knowledge about a process and its expected or unexpected variability. Typical

sources of uncertainty include gaps in knowledge gaps in pharmaceutical science and process understanding, sources of harm (e.g., failure modes of a process, sources of variability), and probability of detection of problems.

25. The output of a risk assessment is either a quantitative estimate of risk or a qualitative **description** of a range of risk. When risk is expressed quantitatively, a numerical probability is used. Alternatively, risk can be expressed using qualitative descriptors, such as “high”, “medium”, or “low”, which should be defined in as much detail as possible. Sometimes a "risk score" is used to further define descriptors in risk ranking. In quantitative risk assessments, a risk estimate provides the likelihood of a specific consequence, given a set of risk-generating circumstances. Thus, quantitative risk estimation is useful for one particular consequence at a time. Alternatively, some risk management tools use a relative risk measure to combine multiple levels of severity and probability into an overall estimate of relative risk. The intermediate steps within a scoring process can sometimes employ quantitative risk estimation.

### Risk Control

26. *Risk control* includes decision making to reduce and/or accept risks. The purpose of risk control is to **reduce** the risk to an acceptable level. The amount of effort used for risk control should be proportional to the significance of the risk. Decision makers might use different processes, including benefit-cost analysis, for understanding the optimal level of risk control.
27. Risk control might focus on the following questions:
- Is the risk above an acceptable level?
  - What can be done to reduce or eliminate risks?
  - What is the appropriate balance among benefits, risks and resources?
  - Are new risks introduced as a result of the identified risks being controlled?
28. **Risk reduction** focuses on processes for mitigation or avoidance of quality risk when it exceeds a specified (acceptable) level (see Fig. 1). Risk reduction might include actions taken to mitigate the severity and probability of harm. Processes that improve the detectability of hazards and quality risks might also be used as part of a risk control strategy. The implementation of risk reduction measures can introduce new risks into the system or increase the significance of other existing risks. Hence, it might be appropriate to revisit the risk assessment to identify and evaluate any possible change in risk after implementing a risk reduction process.
29. **Risk acceptance** is a decision to accept risk. Risk acceptance can be a formal decision to accept the residual risk or it can be a passive decision in which residual risks are not specified. For some types of harms, even the best quality risk management practices might not entirely eliminate risk. In these circumstances, it might be agreed that an appropriate quality risk management strategy has been applied and that quality risk is reduced to a specified (acceptable) level. This (specified) acceptable level will depend on many parameters and should be decided on a case-by-case basis.

## Risk Communication

30. **Risk communication** is the sharing of information about risk and risk management between the decision makers and others. Parties can communicate at any stage of the risk management process (see Fig. 1: dashed arrows). The output/result of the quality risk management process should be appropriately communicated and documented (see Fig. 1: solid arrows). Communications might include those among interested parties; e.g., regulators and industry, industry and the patient, within a company, industry or regulatory authority, etc. The included information might relate to the existence, nature, form, probability, severity, acceptability, control, treatment, detectability or other aspects of risks to quality. Communication need not be carried out for each and every risk acceptance. Between the industry and regulatory authorities, communication concerning quality risk management decisions might be effected through existing channels as specified in regulations and guidances.

## Risk Review

31. Risk management should be an ongoing part of the quality management process. A mechanism to review or monitor events should be implemented.
32. The output/results of the risk management process should be reviewed to take into account new knowledge and experience. Once a quality risk management process has been initiated, that process should continue to be utilized for events that might impact the original quality risk management decision, whether these events are planned (e.g. results of product review, inspections, audits, change control) or unplanned (e.g. root cause from failure investigations, recall). The frequency of any review should be based upon the level of risk. Risk review might include reconsideration of risk acceptance decisions (section 4.4).

## RISK MANAGEMENT METHODOLOGY

33. Quality risk management supports a scientific and practical approach to decision-making. It provides documented, transparent and reproducible methods to accomplish steps of the quality risk management process based on current knowledge about assessing the probability, severity and sometimes detectability of the risk.
34. Traditionally, risks to quality have been assessed and managed in a variety of informal ways (empirical and/ or internal procedures) based on, for example, compilation of observations, trends and other information. Such approaches continue to provide useful information that might support topics such as handling of complaints, quality defects, deviations and allocation of resources.
35. Additionally, the pharmaceutical industry and regulators can assess and manage risk using recognized risk management tools and/ or internal procedures (e.g., standard operating procedures). Below is a non-exhaustive list of some of these tools (further details in Annex 1 and Chapter 8):
- Basic risk management facilitation methods (flowcharts, check sheets etc.)
  - Failure Mode Effects Analysis (FMEA)
  - Failure Mode, Effects and Criticality Analysis (FMECA)
  - Fault Tree Analysis (FTA)
  - Hazard Analysis and Critical Control Points (HACCP)
  - Hazard Operability Analysis (HAZOP)

- 
- Preliminary Hazard Analysis (PHA)
  - Risk ranking and filtering
  - Supporting statistical tools
36. It might be appropriate to adapt these tools for use in specific areas pertaining to drug substance and drug (medicinal) product quality. Quality risk management methods and the supporting statistical tools can be used in combination (e.g. Probabilistic Risk Assessment). Combined use provides flexibility that can facilitate the application of quality risk management principles.
37. The degree of rigor and formality of quality risk management should reflect available knowledge and be commensurate with the complexity and/ or criticality of the issue to be addressed.

## **INTEGRATION OF QUALITY RISK MANAGEMENT INTO INDUSTRY AND REGULATORY OPERATIONS**

38. Quality risk management is a process that supports science-based and practical decisions when integrated into quality systems (see Annex II). As outlined in the introduction, appropriate use of quality risk management does not obviate industry's obligation to comply with regulatory requirements. However, effective quality risk management can facilitate better and more informed decisions, can provide regulators with greater assurance of a company's ability to deal with potential risks, and might affect the extent and level of direct regulatory oversight. In addition, quality risk management can facilitate better use of resources by all parties.
39. Training of both industry and regulatory personnel in quality risk management processes provides for greater understanding of decision-making processes and builds confidence in quality risk management outcomes.
40. Quality risk management should be integrated into existing operations and documented appropriately. Annex II provides examples of situations in which the use of the quality risk management process might provide information that could then be used in a variety of pharmaceutical operations. These examples are provided for illustrative purposes only and should not be considered a definitive or exhaustive list. These examples are not intended to create any new expectations beyond the requirements laid out in the current regulations.
41. Examples for industry and regulatory operations (see Annex II):
- Quality management
42. Examples for industry operations and activities (see Annex II):
- Development
  - Facility, equipment and utilities
  - Materials management
  - Production
  - Laboratory control and stability testing
  - Packaging and labelling
43. Examples for regulatory operations (see Annex II):
- Inspection and assessment activities

44. While regulatory decisions will continue to be taken on a regional basis, a common understanding and application of quality risk management principles could facilitate mutual confidence and promote more consistent decisions among regulators on the basis of the same information. This collaboration could be important in the development of policies and guidelines that integrate and support quality risk management practices.

## DEFINITIONS

Decision maker(s) – Person(s) with the competence and authority to make appropriate and timely quality risk management decisions

Detectability - the ability to discover or determine the existence, presence, or fact of a hazard

Harm – damage to health, including the damage that can occur from loss of product quality or availability

Hazard - the potential source of harm (ISO/IEC Guide 51)

Product Lifecycle – all phases in the life of the product from the initial development through marketing until the product's discontinuation

Quality – the degree to which a set of inherent properties of a product, system or process fulfils requirements (see ICH Q6a definition specifically for "quality" of drug substance and drug (medicinal) products.)

Quality risk management – a systematic process for the assessment, control, communication and review of risks to the quality of the drug (medicinal) product across the product lifecycle

Quality system – the sum of all aspects of a system that implements quality policy and ensures that quality objectives are met

Requirements – the explicit or implicit needs or expectations of the patients or their surrogates (e.g. health care professionals, regulators and legislators). In this document, "requirements" refers not only to statutory, legislative, or regulatory requirements, but also to such needs and expectations.

Risk – the combination of the probability of occurrence of harm and the severity of that harm (ISO/IEC Guide 51)

Risk acceptance – the decision to accept risk (ISO Guide 73)

Risk analysis – the estimation of the risk associated with the identified hazards

Risk assessment – a systematic process of organizing information to support a risk decision to be made within a risk management process. It consists of the identification of hazards and the analysis and evaluation of risks associated with exposure to those hazards.

Risk communication – the sharing of information about risk and risk management between the decision maker and other stakeholders

Risk control – actions implementing risk management decisions (ISO Guide 73)

Risk evaluation – the comparison of the estimated risk to given risk criteria using

---

a quantitative or qualitative scale to determine the significance of the risk

Risk identification – the systematic use of information to identify potential sources of harm (hazards) referring to the risk question or problem description

Risk management – the systematic application of quality management policies, procedures, and practices to the tasks of assessing, controlling, communicating and reviewing risk

Risk reduction – actions taken to lessen the probability of occurrence of harm and the severity of that harm

Risk review – review or monitoring of output/results of the risk management process considering (if appropriate) new knowledge and experience about the risk

Severity – a measure of the possible consequences of a hazard

Stakeholder – any individual, group or organization that can affect, be affected by, or perceive itself to be affected by a risk. Decision makers might also be stakeholders. For the purposes of this guideline, the primary stakeholders are the patient, healthcare professional, regulatory authority, and industry

Trend – a statistical term referring to the direction or rate of change of a variable(s)

## REFERENCES

ICH Q8 Pharmaceutical development

ISO/IEC Guide 73:2002 - Risk Management - Vocabulary - Guidelines for use in Standards

ISO/IEC Guide 51:1999 - Safety Aspects - Guideline for their inclusion in standards

Process Mapping by the American Productivity & Quality Center 2002, ISBN 1928593739

IEC 61025 - Fault Tree Analysis (FTA)

IEC 60812 Analysis Techniques for system reliability—Procedures for failure mode and effects analysis (FMEA)

Failure Mode and Effect Analysis, FMEA from Theory to Execution, 2nd Edition 2003, D. H. Stamatis, ISBN 0873895983

Guidelines for Failure Modes and Effects Analysis (FMEA) for Medical Devices, 2003 Dyadem Press ISBN 0849319102

The Basics of FMEA, Robin McDermott, Raymond J. Mikulak, Michael R. Beauregard 1996 ISBN 0527763209

WHO Technical Report Series No 908, 2003 Annex 7 Application of Hazard Analysis and Critical Control Point (HACCP) methodology to pharmaceuticals

IEC 61882 - Hazard Operability Analysis (HAZOP)

ISO 14971:2000 - Application of Risk Management to Medical Devices

ISO 7870:1993 - Control Charts

ISO 7871:1997 - Cumulative Sum Charts

ISO 7966:1993 - Acceptance Control Charts

ISO 8258:1991 - Shewhart Control Charts

What is Total *Quality Control?*; *The Japanese Way*, Kaoru Ishikawa (Translated by David J. Liu), 1985, ISBN 0139524339

---

## APPENDIX I: RISK MANAGEMENT METHODS AND TOOLS

The purpose of this appendix is to provide a general overview of and references for some of the primary tools that might be used in quality risk management by industry and regulators. The references are included as an aid to gain more knowledge and detail about the particular tool. This is not an exhaustive list. It is important to note that no one tool or set of tools is applicable to every situation in which a quality risk management procedure is used.

### I.1 Basic Risk Management Facilitation Methods

Some of the simple techniques that are commonly used to structure risk management by organizing data and facilitating decision-making are:

- Flowcharts
- Check Sheets
- Process Mapping
- Cause and Effect Diagrams (also called an Ishikawa diagram or fish bone diagram)

### I.2 Failure Mode Effects Analysis (FMEA)

FMEA (see IEC 60812) provides for an evaluation of potential failure modes for processes and their likely effect on outcomes and/or product performance. Once failure modes are established, risk reduction can be used to eliminate, contain, reduce or control the potential failures. FMEA relies on product and process understanding. FMEA methodically breaks down the analysis of complex processes into manageable steps. It is a powerful tool for summarizing the important modes of failure, factors causing these failures and the likely effects of these failures.

#### Potential Areas of Use(s)

FMEA can be used to prioritize risks and monitor the effectiveness of risk control activities.

FMEA can be applied to equipment and facilities and might be used to analyze a manufacturing operation and its effect on product or process. It identifies elements/operations within the system that render it vulnerable. The output/results of FMEA can be used as a basis for design or further analysis or to guide resource deployment.

### I.3 Failure Mode, Effects and Criticality Analysis (FMECA)

FMEA might be extended to incorporate an investigation of the degree of severity of the consequences, their respective probabilities of occurrence, and their detectability, thereby becoming a Failure Mode Effect and Criticality Analysis (FMECA; see IEC 60812). In order for such an analysis to be performed, the product or process specifications should be established.

FMECA can identify places where additional preventive actions might be appropriate to minimize risks.

#### Potential Areas of Use(s)

FMECA application in the pharmaceutical industry should mostly be utilized for failures and risks associated with manufacturing processes; however, it is not



---

limited to this application. The output of an FMECA is a relative risk “score” for each failure mode, which is used to rank the modes on a relative risk basis.

#### **I.4 Fault Tree Analysis (FTA)**

The FTA tool (see IEC 61025) is an approach that assumes failure of the functionality of a product or process. This tool evaluates system (or subsystem) failures one at a time but can combine multiple causes of failure by identifying causal chains. The results are represented pictorially in the form of a tree of fault modes. At each level in the tree, combinations of fault modes are described with logical operators (AND, OR, etc.). FTA relies on the experts’ process understanding to identify causal factors.

##### **Potential Areas of Use(s)**

FTA can be used to establish the pathway to the root cause of the failure. FTA can be used to investigate complaints or deviations in order to fully understand their root cause and to ensure that intended improvements will fully resolve the issue and not lead to other issues (i.e. solve one problem yet cause a different problem). Fault Tree Analysis is an effective tool for evaluating how multiple factors affect a given issue. The output of an FTA includes a visual representation of failure modes. It is useful both for risk assessment and in developing monitoring programs.

#### **I.5 Hazard Analysis and Critical Control Points (HACCP)**

HACCP is a systematic, proactive, and preventive tool for assuring product quality, reliability, and safety (see WHO Technical Report Series No 908, 2003 Annex 7). It is a structured approach that applies technical and scientific principles to analyze, evaluate, prevent, and control the risk or adverse consequence(s) of hazard(s) due to the design, development, production, and use of products.

HACCP consists of the following seven steps:

1. conduct a hazard analysis and identify preventive measures for each step of the process;
2. determine the critical control points;
3. establish critical limits;
4. establish a system to monitor the critical control points;
5. establish the corrective action to be taken when monitoring indicates that the critical control points are not in a state of control;
6. establish system to verify that the HACCP system is working effectively;
7. establish a record-keeping system.

##### **Potential Areas of Use(s)**

HACCP might be used to identify and manage risks associated with physical, chemical and biological hazards (including microbiological contamination). HACCP is most useful when product and process understanding is sufficiently comprehensive to support identification of critical control points. The output of a HACCP analysis is risk management information that facilitates monitoring of critical points not only in the manufacturing process but also in other life cycle phases.

## **I.6 Hazard Operability Analysis (HAZOP)**

HAZOP (see IEC 61882) is based on a theory that assumes that risk events are caused by deviations from the design or operating intentions. It is a systematic brainstorming technique for identifying hazards using so-called “guide-words”. “Guide-words” (e.g., No, More, Other Than, Part of, etc.) are applied to relevant parameters (e.g., contamination, temperature) to help identify potential deviations from normal use or design intentions. It often uses a team of people with expertise covering the design of the process or product and its application.

### **Potential Areas of Use(s)**

HAZOP can be applied to manufacturing processes, including outsourced production and formulation as well as the upstream suppliers, equipment and facilities for drug substances and drug (medicinal) products. It has also been used primarily in the pharmaceutical industry for evaluating process safety hazards. As is the case with HACCP, the output of a HAZOP analysis is a list of critical operations for risk management. This facilitates regular monitoring of critical points in the manufacturing process.

## **I.7 Preliminary Hazard Analysis (PHA)**

PHA is a tool of analysis based on applying prior experience or knowledge of a hazard or failure to identify future hazards, hazardous situations and events that might cause harm, as well as to estimate their probability of occurrence for a given activity, facility, product or system. The tool consists of: 1) the identification of the possibilities that the risk event happens, 2) the qualitative evaluation of the extent of possible injury or damage to health that could result and 3) a relative ranking of the hazard using a combination of severity and likelihood of occurrence, and 4) the identification of possible remedial measures.

### **Potential Areas of Use(s)**

PHA might be useful when analyzing existing systems or prioritizing hazards where circumstances prevent a more extensive technique from being used. It can be used for product, process and facility design as well as to evaluate the types of hazards for the general product type, then the product class, and finally the specific product. PHA is most commonly used early in the development of a project when there is little information on design details or operating procedures; thus, it will often be a precursor to further studies. Typically, hazards identified in the PHA are further assessed with other risk management tools such as those in this section.

## **I.8 Risk Ranking and Filtering**

Risk ranking and filtering is a tool for comparing and ranking risks. Risk ranking of complex systems typically requires evaluation of multiple diverse quantitative and qualitative factors for each risk. The tool involves breaking down a basic risk question into as many components as needed to capture factors involved in the risk. These factors are combined into a single relative risk score that can then be used for ranking risks. “Filters,” in the form of weighting factors or cut-offs for risk scores, can be used to scale or fit the risk ranking to management or policy objectives.

### **Potential Areas of Use(s)**

Risk ranking and filtering can be used to prioritize manufacturing sites for

---

inspection/audit by regulators or industry. Risk ranking methods are particularly helpful in situations in which the portfolio of risks and the underlying consequences to be managed are diverse and difficult to compare using a single tool. Risk ranking is useful when management needs to evaluate both quantitatively-assessed and qualitatively-assessed risks within the same organizational framework.

## I.9 Supporting Statistical Tools

Statistical tools can support and facilitate quality risk management. They can enable effective data assessment, aid in determining the significance of the data set(s), and facilitate more reliable decision making. A listing of some of the principal statistical tools commonly used in the pharmaceutical industry is provided:

(i) Control Charts, for example:

- Acceptance Control Charts (see ISO 7966)
- Control Charts with Arithmetic Average and Warning Limits (see ISO 7873)
- Cumulative Sum Charts (see ISO 7871)
- Shewhart Control Charts (see ISO 8258)
- Weighted Moving Average

(ii) Design of Experiments (DOE)

(iii) Histograms

(iv) Pareto Charts

(v) Process Capability Analysis

## **APPENDIX II: POTENTIAL APPLICATIONS FOR QUALITY RISK MANAGEMENT**

This Appendix is intended to identify potential uses of quality risk management principles and tools by industry and regulators. However, the selection of particular risk management tools is completely dependent upon specific facts and circumstances. These examples are provided for illustrative purposes and only suggest potential uses of quality risk management. This Annex is not intended to create any new expectations beyond the current regulatory requirements.

### **II.1 Quality Risk Management as Part of Integrated Quality Management**

#### **Documentation**

To review current interpretations and application of regulatory expectations

To determine the desirability of and/or develop the content for SOPs, guidelines, etc.

#### **Training and education**

To determine the appropriateness of initial and/or ongoing training sessions based on education, experience and working habits of staff, as well as on a periodic assessment of previous training (e.g., its effectiveness)

To identify the training, experience, qualifications and physical abilities that allow personnel to perform an operation reliably and with no adverse impact on the quality of the product

#### **Quality defects**

To provide the basis for identifying, evaluating, and communicating the potential quality impact of a suspected quality defect, complaint, trend, deviation, investigation, out of specification result, etc.

To facilitate risk communications and determine appropriate action to address significant product defects, in conjunction with regulatory authorities (e.g., recall)

#### **Auditing/Inspection**

To define the frequency and scope of audits, both internal and external, taking into account factors such as:

- Existing legal requirements
- Overall compliance status and history of the company or facility
- Robustness of a company's quality risk management activities
- Complexity of the site
- Complexity of the manufacturing process
- Complexity of the product and its therapeutic significance
- Number and significance of quality defects (e.g. recall)
- Results of previous audits/inspections

- Major changes of building, equipment, processes, key personnel
- Experience with manufacturing of a product (e.g. frequency, volume, number of batches)
- Test results of official control laboratories

### **Periodic review**

To select, evaluate and interpret trend results of data within the product quality review

To interpret monitoring data (e.g., to support an assessment of the appropriateness of revalidation or changes in sampling)

### **Change management / change control**

To manage changes based on knowledge and information accumulated in pharmaceutical development and during manufacturing

To evaluate the impact of the changes on the availability of the final product

To evaluate the impact on product quality of changes to the facility, equipment, material, manufacturing process or technical transfers

To determine appropriate actions preceding the implementation of a change, e.g., additional testing, (re)qualification, (re)validation or communication with regulators

### **Continual improvement**

To facilitate continual improvement in processes throughout the product lifecycle

## **II.2 Quality Risk Management as Part of Regulatory Operations**

### **Inspection and assessment activities**

To assist with resource allocation including, for example, inspection planning and frequency, and inspection and assessment intensity (see "Auditing" section in Annex II.1)

To evaluate the significance of, for example, quality defects, potential recalls and inspectional findings

To determine the appropriateness and type of post-inspection regulatory follow-up

To evaluate information submitted by industry including pharmaceutical development information

To evaluate impact of proposed variations or changes

To identify risks which should be communicated between inspectors and assessors to facilitate better understanding of how risks can be or are controlled (e.g. parametric release, Process Analytical Technology (PAT)).

## II.3 Quality Risk Management as Part of Development

To design a quality product and its manufacturing process to consistently deliver the intended performance of the product (see ICH Q8)

To enhance knowledge of product performance over a wide range of material attributes (e.g. particle size distribution, moisture content, flow properties), processing options and process parameters

To assess the critical attributes of raw materials, solvents, Active Pharmaceutical Ingredient (API) starting materials, APIs, excipients, or packaging materials

To establish appropriate specifications, identify critical process parameters and establish manufacturing controls (e.g., using information from pharmaceutical development studies regarding the clinical significance of quality attributes and the ability to control them during processing)

To decrease variability of quality attributes:

- reduce product and material defects
- reduce manufacturing defects

To assess the need for additional studies (e.g., bioequivalence, stability) relating to scale up and technology transfer

To make use of the “design space” concept (see ICH Q8)

## II.4 Quality Risk Management for Facilities, Equipment and Utilities

### Design of facility / equipment

To determine appropriate zones when designing buildings and facilities, e.g.,

- flow of material and personnel
- minimize contamination
- pest control measures
- prevention of mix-ups
- open versus closed equipment
- clean rooms versus isolator technologies
- dedicated or segregated facilities / equipment

To determine appropriate product contact materials for equipment and containers (e.g., selection of stainless steel grade, gaskets, lubricants)

To determine appropriate utilities (e.g., steam, gases, power source, compressed air, heating, ventilation and air conditioning (HVAC), water)

To determine appropriate preventive maintenance for associated equipment (e.g., inventory of necessary spare parts)

### Hygiene aspects in facilities

To protect the product from environmental hazards, including chemical, microbiological, and physical hazards (e.g., determining appropriate clothing and gowning, hygiene concerns)

To protect the environment (e.g., personnel, potential for cross-contamination)

---

from hazards related to the product being manufactured

### **Qualification of facility/equipment/utilities**

To determine the scope and extent of qualification of facilities, buildings, and production equipment and/or laboratory instruments (including proper calibration methods)

### **Cleaning of equipment and environmental control**

To differentiate efforts and decisions based on the intended use (e.g. multi-versus single-purpose, batch versus continuous production)

To determine acceptable (specified) cleaning validation limits

### **Calibration/preventive maintenance**

To set appropriate calibration and maintenance schedules

### **Computer systems and computer controlled equipment**

To select the design of computer hardware and software (e.g., modular, structured, fault tolerance)

To determine the extent of validation, e.g.:

- identification of critical performance parameters
- selection of the requirements and design
- code review
- the extent of testing and test methods
- reliability of electronic records and signatures

## **II.5 Quality Risk Management as Part of Materials Management**

### **Assessment and evaluation of suppliers and contract manufacturers**

To provide a comprehensive evaluation of suppliers and contract manufacturers (e.g., auditing, supplier quality agreements)

### **Starting material**

To assess differences and possible quality risks associated with variability in starting materials (e.g., age, route of synthesis).

### **Use of materials**

To determine whether it is appropriate to use material under quarantine (e.g., for further internal processing)

To determine appropriateness of reprocessing, reworking, use of returned goods

### **Storage, logistics and distribution conditions**

To assess the adequacy of arrangements to ensure maintenance of appropriate storage and transport conditions (e.g., temperature, humidity, container design)

To determine the effect on product quality of discrepancies in storage or transport

conditions (e.g. cold chain management) in conjunction with other ICH guidelines

To maintain infrastructure (e.g. capacity to ensure proper shipping conditions, interim storage, handling of hazardous materials and controlled substances, customs clearance)

To provide information for ensuring the availability of pharmaceuticals (e.g. ranking risks to the supply chain)

## **II.6 Quality Risk Management as Part of Production**

### **Validation**

To identify the scope and extent of verification, qualification and validation activities (e.g., analytical methods, processes, equipment and cleaning methods)

To determine the extent for follow-up activities (e.g., sampling, monitoring and re-validation)

To distinguish between critical and non-critical process steps to facilitate design of a validation study

### **In-process sampling & testing**

To evaluate the frequency and extent of in-process control testing (e.g., to justify reduced testing under conditions of proven control)

To evaluate and justify the use of process analytical technologies (PAT) in conjunction with parametric and real time release

### **Production planning**

To determine appropriate production planning (e.g. dedicated, campaign and concurrent production process sequences)

## **II.7 Quality Risk Management as Part of Laboratory Control and Stability Studies**

### **Out of specification results**

To identify potential root causes and corrective actions during the investigation of out of specification results

### **Retest period / expiration date**

To evaluate adequacy of storage and testing of intermediates, excipients and starting materials

## **II.8 Quality Risk Management as Part of Packaging and Labelling**

### **Design of packages**

To design the secondary package for the protection of primary packaged product (e.g., to ensure product authenticity, label legibility)

### **Selection of container closure system**



---

To determine the critical parameters of the container closure system

**Label controls**

To design label control procedures based on the potential for mix-ups involving different product labels, including different versions of the same label

---

## GLOSSARY

Definitions given below apply to the words as used in this Guide. They may have different meanings in other contexts.

**Action limit**

Established criteria, requiring immediate follow-up and corrective action if exceeded.

**Air lock**

An enclosed space with two or more doors, and which is interposed between two or more rooms, e.g. of differing class of cleanliness, for the purpose of controlling the air-flow between those rooms when they need to be entered. An air-lock is designed for and used by either people or goods.

**Alert limit**

Established criteria giving early warning of potential drift from normal conditions which are not necessarily grounds for definitive corrective action but which require follow-up investigation.

**Authorised person**

Person recognised by the authority as having the necessary basic scientific and technical background and experience.

**Batch (or lot)**

A defined quantity of starting material, packaging material or product processed in one process or series of processes so that it could be expected to be homogeneous.

Note: To complete certain stages of manufacture, it may be necessary to divide a batch into a number of subbatches, which are later brought together to form a final homogeneous batch. In the case of continuous manufacture, the batch must correspond to a defined fraction of the production, characterised by its intended homogeneity.

For the control of the finished product, a batch of a medicinal products comprises all the units of a pharmaceutical form which are made from the same initial mass of material and have undergone a single series of manufacturing operations or a single sterilisation operation or, in the case of a continuous production process, all the units manufactured in a given period of time.

**Batch number (or lot number)**

A distinctive combination of numbers and/or letters which specifically identifies a batch.

**Biogenerator**

A contained system, such as a fermenter, into which biological agents are introduced along with other materials so as to effect their multiplication or their

production of other substances by reaction with the other materials. Biogenerators are generally fitted with devices for regulation, control, connection, material addition and material withdrawal.

**Biological agents**

Microorganisms, including genetically engineered microorganisms, cell cultures and endoparasites, whether pathogenic or not.

**Bulk product**

Any product which has completed all processing stages up to, but not including, final packaging.

**Calibration**

The set of operations which establish, under specified conditions, the relationship between values indicated by a measuring instrument or measuring system, or values represented by a material measure, and the corresponding known values of a reference standard.

**Cell bank**

*Cell bank system:* A cell bank system is a system whereby successive batches of a product are manufactured by culture in cells derived from the same master cell bank (fully characterised for identity and absence of contamination). A number of containers from the master cell bank are used to prepare a working cell bank. The cell bank system is validated for a passage level or number of population doublings beyond that achieved during routine production.

*Master cell bank:* A culture of (fully characterised) cells distributed into containers in a single operation, processed together in such a manner as to ensure uniformity and stored in such a manner as to ensure stability. A master cell bank is usually stored at -70°C or lower.

*Working cell bank:* A culture of cells derived from the master cell bank and intended for use in the preparation of production cell cultures. The working cell bank is usually stored at -70°C or lower.

**Cell culture**

The result from the in-vitro growth of cells isolated from multicellular organisms.

**Clean area**

An area with defined environmental control of particulate and microbial contamination, constructed and used in such a way as to reduce the introduction, generation and retention of contaminants within the area.

Note: The different degrees of environmental control are defined in the Supplementary Guidelines for the Manufacture of sterile medicinal products.

**Clean/contained area**

An area constructed and operated in such a manner that will achieve the aims of both a clean area and a contained area at the same time.

**Containment**

The action of confining a biological agent or other entity within a defined space.

*Primary containment:* A system of containment which prevents the escape of a biological agent into the immediate working environment. It involves the use of

---

closed containers or safety biological cabinets along with secure operating procedures.

*Secondary containment:* A system of containment which prevents the escape of a biological agent into the external environment or into other working areas. It involves the use of rooms with specially designed air handling, the existence of airlocks and/or sterilises for the exit of materials and secure operating procedures. In many cases it may add to the effectiveness of primary containment.

**Contained area**

An area constructed and operated in such a manner (and equipped with appropriate air handling and filtration) so as to prevent contamination of the external environment by biological agents from within the area.

**Controlled area**

An area constructed and operated in such a manner that some attempt is made to control the introduction of potential contamination (an air supply approximating to grade D may be appropriate), and the consequences of accidental release of living organisms. The level of control exercised should reflect the nature of the organism employed in the process. At a minimum, the area should be maintained at a pressure negative to the immediate external environment and allow for the efficient removal of small quantities of airborne contaminants.

**Computerised system**

A system including the input of data, electronic processing and the output of information to be used either for reporting or automatic control.

**Cross contamination**

Contamination of a starting material or of a product with another material or product.

**Crude plant (vegetable drug)**

Fresh or dried medicinal plant or parts thereof.

**Cryogenic vessel**

A container designed to contain liquefied gas at extremely low temperature.

**Cylinder**

A container designed to contain gas at a high pressure.

**Exotic organism**

A biological agent where either the corresponding disease does not exist in a given country or geographical area, or where the disease is the subject of prophylactic measures or an eradication programme undertaken in the given country or geographical area.

**Finished product**

A medicinal product which has undergone all stages of production, including packaging in its final container.

**Herbal medicinal products**

Medicinal products containing, as active ingredients, exclusively plant material and/or vegetable drug preparations.

**Infected**

Contaminated with extraneous biological agents and therefore capable of

---

spreading infection.

**In-process control**

Checks performed during production in order to monitor and if necessary to adjust the process to ensure that the product conforms to its specification. The control of the environment or equipment may also be regarded as a part of in-process control.

**Intermediate product**

Partly processed material which must undergo further manufacturing steps before it becomes a bulk product.

**Liquifiable gases**

Those which, at the normal filling temperature and pressure, remain as a liquid in the cylinder.

**Manifold**

Equipment or apparatus designed to enable one or more gas containers to be filled simultaneously from the same source.

**Manufacture**

All operations of purchase of materials and products, Production, Quality Control, release, storage, distribution of medicinal products and the related controls.

**Manufacturer**

Holder of a manufacturing authorisation.

**Media fill**

Method of evaluating an aseptic process using a microbial growth medium. (Media fills are synonymous to simulated product fills, broth trials, broth fills etc.)

**Medicinal plant**

Plant the whole or part of which is used for pharmaceutical purpose.

**Medicinal products**

Any medicine or similar product intended for human use, which is subject to control under health legislation in the manufacturing or importing State.

**Packaging**

All operations, including filling and labelling, which a bulk product has to undergo in order to become a finished product.

Note: Sterile filling would not normally be regarded as part of packaging, the bulk product being the filled, but not finally packaged, primary containers.

**Packaging material**

Any material employed in the packaging of a medicinal products, excluding any outer packaging used for transportation or shipment. Packaging materials are referred to as primary or secondary according to whether or not they are intended to be in direct contact with the product.

**Procedures**

Description of the operations to be carried out, the precautions to be taken and measures to be applied directly or indirectly related to the manufacture of a medicinal products.

**Production**

All operations involved in the preparation of a medicinal products, from receipt of materials, through processing and packaging, to its completion as a finished product.

**Qualification**

Action of proving that any equipment works correctly and actually leads to the expected results. The word validation is sometimes widened to incorporate the concept of qualification.

**Quality control**

See Chapter 1.

**Quarantine**

The status of starting or packaging materials, intermediate, bulk or finished products isolated physically or by other effective means whilst awaiting a decision on their release or refusal.

**Radiopharmaceutical**

"Radiopharmaceutical" means any medicinal products which, when ready for use, contains one or more radionuclides (radioactive isotopes) included for a pharmaceutical purpose.

**Reconciliation**

A comparison, making due allowance for normal variation, between the amount of product or materials theoretically and actually produced or used.

**Record**

See Chapter 4.

**Recovery**

The introduction of all or part of previous batches of the required quality into another batch at a defined stage of manufacture.

**Reprocessing**

The reworking of all or part of a batch of product of an unacceptable quality from a defined stage of production so that its quality may be rendered acceptable by one or more additional operations.

**Return**

Sending back to the manufacturer or distributor of a medicinal products which may or may not present a quality defect.

**Seed lot**

*Seed lot system:* A seed lot system is a system according to which successive batches of a product are derived from the same master seed lot at a given passage level. For routine production, a working seed lot is prepared from the master seed lot. The final product is derived from the working seed lot and has not undergone more passages from the master seed lot than the vaccine shown in clinical studies to be satisfactory with respect to safety and efficacy. The origin and the passage history of the master seed lot and the working seed lot are recorded.

*Master seed lot:* A culture of a micro-organism distributed from a single bulk into containers in a single operation in such a manner as to ensure uniformity, to prevent contamination and to ensure stability. A master seed lot in liquid form is usually stored at or below -70°C. A freeze-dried master seed lot is stored at a

---

temperature known to ensure stability.

*Working seed lot:* A culture of a micro-organism derived from the master seed lot and intended for use in production. Working seed lots are distributed into containers and stored as described above for master seed lots.

**Specification**

See Chapter 4.

**Starting material**

Any substance used in the production of a medicinal products, but excluding packaging materials.

**Sterility**

Sterility is the absence of living organisms. The conditions of the sterility tests are given in the European (or other relevant) Pharmacopoeia.\*

**Validation**

Action of proving, in accordance with the principles of Good Manufacturing Practice, that any procedure, process, equipment, material, activity or system actually leads to the expected results (see also qualification).

---

\* The procedures and precautions employed should be such as to give a theoretical level of not more than one living micro-organism in  $10^6$  units in the final product.

## DOCUMENT REVISION HISTORY

Date of revision	Revision number	Document Number	Author(s)	Changes made and reasons for revision
5 <sup>th</sup> April 2013	0	INS/GDL/001	Nasser Mbaziira, Kate Kikule, Peter Ssali	Firs issue whereby the Annexes were incorporated in the same document for GMP Guidelines for Medicinal Products. The Annexes were adopted from the PIC/S- PE 009-07 Annexes.
15 <sup>th</sup> March 2017	1	INS/GDL/001 (Annexes)	<i>Authors:</i> Kate Kikule, Denis Mwesigwa, Peter Ssali.	1) Separated the Annexes from the NDA GMP Guidelines main document, because the Annexes apply to both guidelines for Finished Pharmaceutical Products, which is now Part 1 of the GMP Guidelines; and for the Active Pharmaceutical Products, which is now Part 2 of the GMP Guidelines.  2) Adopted the revised Annexes from PIC/S PE 009-13 ANNEXES of January 2017.
18 <sup>th</sup> March 2020	2	INS/GDL/001 - (Annexes)	<i>Authors:</i> Frank Kaleebu  <i>Reviewers:</i> Solomon Onen Denis Mwesigwa Peter Ssali	1) Annex 17: Entire annex has been revised to align with PIC/S Guide to Good Manufacturing Practice for medicinal products, Annexes, July 2018, which included the addition of a scope and section on real time release testing (RTRT)
28 August 2023	3	INS/GDL/001 - (Annexes)	<i>Authors:</i> Frank Kaleebu  <i>Reviewers:</i> Solomon Onen Denis Mwesigwa Dora Namyalo Peter Ssali	1. Adopted the revised Annex 2 from PIC/S PE 009-15 ANNEXES of May 2021  2. . Adopted the revised Annex 13 from PIC/S PE 009-16 ANNEXES of May 2022  3. Incorporated new annex 16 from from PIC/S PE 009-16 ANNEXES of February 2022