中華人民共和國香港特別行政區政府總部食物及衞生局
Food and Health Bureau, Government Secretariat
The Government of the Hong Kong Special Administrative Region
The People's Republic of China

Our Ref: FHB/H/23/6 Pt.30 *Tel:* 3509 8956
Your Ref: *Fax:* 2840 0467

27 January 2015

Ms Maisie LAM
Clerk to Panel
Legislative Council Panel on Health Services
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong
(Fax: 2185 7845)

Dear Ms LAM,

Legislative Council Panel on Health Services
Regulation and control of pharmaceutical products in Hong Kong

I refer to the discussions on the captioned subject at the Panel meeting held on 31 March 2009. In response to the request for providing the Panel with the revised checklist for inspections on pharmaceutical manufacturers by the Department of Health ("DH"), our reply is as follows.

As the Administration indicated at the above Panel meeting, in pursuance with the recommendation of the Review Committee on Regulation of Pharmaceutical Products in Hong Kong to upgrade Hong Kong's Good Manufacturing Practices ("GMP") licensing standards to the standards promulgated by the Pharmaceutical Inspection Co-operation Scheme ("PIC/S"), the DH would commission a consultancy service for advice on upgrading the GMP licensing standards to PIC/S standards.

The consultancy was completed in August 2014 and changes in the inspection practice were made accordingly in a phased approach. As advised by the consultant, the GMP inspection report format has been revised to align with the PIC/S requirements. Moreover, the DH has formulated additional guidelines and aide-memoire for the inspections to ensure the standards and consistency of the GMP inspections. An inspection checklist for secondary packaging manufacturers has also been prepared by the DH. Relevant forms and documents are enclosed in this letter for reference by Members of the Panel (please refer to the inspection reports, aide-memoire for the inspections as well as inspection checklist for secondary packaging manufacturers in **Annexes I, II and III** respectively).

Yours sincerely,

(Miss Fiona CHAU)
for Secretary for Food and Health

c.c. Director of Health
(Attn: Assistant Director (Drug Office))

Inspection preparation record

Manufacturer:	
Site address:	
Inspection Team:	

Inspection date:		**Announced**:	Yes / No
Reason if unannounced:			
Type of Inspection:	Initial / Routine / Special		
Scope of inspection:			
Manufacturer notified: (if applicable)	Date:		

Inspection preparation	**Reviewed (Y/N)**	**Comments**
SMF reviewed		
Licence and conditions reviewed		
Previous inspection report(s) / correspondence / inspection close out record reviewed		
Follow-up required from previous inspection reviewed		
Complaints reviewed		
Recalls reviewed		
Results of any testing reviewed		
Range of products on register reviewed		
Inspection Plan prepared		
Meeting attendance sheet prepared		
Inspection team briefed		

Notes:

Signed (Lead Inspector): Date:

Good Manufacturing Practices Inspection Report

Name of Manufacturer:	[Name of manufacturer]	
Address of Inspected site(s):	[Full address of the inspected site]	
Activities carried out by company:	Manufacture of Active Ingredients	☐
	Manufacture of Finished Pharmaceutical Product	☐
	Manufacture of Intermediate or Bulk	☐
	Primary Packaging	☐
	Secondary Packaging	☐
	Laboratory Testing	☐
	Batch Release	☐
	Other:	☐
Type of inspection:	[Initial, routine re-inspection, special, etc]	
Scope of inspection:	[List dosage forms; OR products if a product specific inspection; OR inspected areas if a special inspection]	
Inspection date(s):	[Date(s), Month, Year]	
Inspector(s):	[Name(s) of the inspector(s), Role] [Name(s) of scientific officer(s) (if applicable)] [Name(s) of observer(s) (if applicable)] [Name of the competent authority(ies)]	
Manufacturing Standard used:	[HK GMP Guide or PIC/S GMP Guide (Version)]	
References:	Manufacturer Licence number: File reference number(s):	

Introduction

[Short description of the company and activities of the company.]

[For inspections outside Hong Kong it should be stated whether the Competent Authority of the country where the inspection took place, was informed of the inspection and whether the Competent Authority took part in the inspection.]

Date of previous inspection:

Names of inspectors involved in previous inspection:

Major changes since the previous inspection:

Brief report of the inspection activities undertaken

Scope of Inspection:
[Short description of the inspection (Product/dosage form related inspection and/or general GMP inspection). The reason for the inspection should be specified (e.g. new manufacturing licence application, routine, investigation of product defect)]

Inspected area(s):
[Each inspected area should be specified. Alternatively refer to the inspection plan (if given to manufacturer)]

Personnel met during the inspection:
[The names and titles of key personnel met should be specified (or a copy of a meeting attendance sheet attached)]

Inspection Team's findings and observations relevant to the inspection; and deficiencies

Quality Management	[Quality system; PQR; QRM]
	[Deviations: procedure and register]
	[Change control: procedure and register]
	[Release for supply/authorised person]
Personnel	[Organisation charts; job descriptions; key personnel]
	[Training and assessment]
	[Personal hygiene]
Premises	[Sampling area; dispensing area]
	[Production area: containment]
	[Quality Control area]
	[Packaging area]
	[Warehouse: starting materials, finished products]
	[Environmental monitoring]
	[Maintenance of facilities, cleaning, pest control]
Equipment	[Production equipment: qualification, maintenance, calibration]
	[Quality control equipment: qualification, maintenance, calibration]
	[Utilities (HVAC, water system, compressed gases, etc): qualification,

	calibration, maintenance]
	[Equipment cleaning and Cleaning validation]
Documentation	[Document control system]
	[Specifications]
	[Manufacturing formula and processing instructions]
	[Review of batch processing and packaging records]
	[SOPs and controlled forms; Records]
	[Computerized system validation]
Production	[Production process; In-process controls]
	[Control of starting materials, packaging materials, finished products]
	[Packaging process]
	[Rejected materials; recovered; returned materials; waste disposal]
	[Validation Master Plan]
	[Process validation]
Quality Control	[Sampling: sampling procedures and records, container and retention]
	[Testing: procedures and records for physical, chemical and microbiological tests; method validation]
	[Handling of reference standards, reagents and culture media]
	[Stability testing]
	[OOS procedures]
Contract Manufacture and Analysis	[GMP-related contracts]
Complaints and Product Recall	[Complaints system: register reviewed]
	[Recalls system: register reviewed]
Self Inspection	[Self-inspection program / records]
Distribution and Shipment	[e.g. Compliance with Good Distribution Practice]
Compliance with Marketing Authorisation(s)	[e.g. for Pre-authorisation inspections]
Other specific issues identified	[e.g. relevant future changes announced by company]
Site Master File	[Assessment of SMF if any; date of SMF]

Miscellaneous

Samples taken:

Distribution of Report:

Attachments

[List any attachments (e.g. inspection plan, meeting attendance sheet)]

List of Deficiencies observed during inspection

Critical deficiencies:

Major deficiencies:

Other deficiencies:

Recommendations

[To the Committee requesting the Inspection or to the Competent / Enforcement Authority for the site inspected]

Summary and conclusions

Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the deficiencies listed above, the manufacturer was considered to be operating at an acceptable level of compliance with the relevant GMP Guide. However, the deficiencies listed above must be addressed in a timely manner.

The manufacturer is expected to respond to all deficiencies within 30 days from the date of the inspection and for each include a description of the corrective action implemented or planned to be implemented, and the date of completion or target date for completion. The acceptability of corrective actions will be assessed through evaluation of the response to each observation and will be followed up during the next inspection.

Or

Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the deficiencies listed in the Inspection Report, a decision on compliance of with the relevant GMP Guide will be made after the manufacturer's response to the deficiencies has been assessed.

The manufacturer is expected to respond to all deficiencies within 30 days from the date of the inspection and for each include a description of the corrective action implemented or planned to be implemented, and the date of completion or target date for completion. In addition, for deficiencies classified as "major", supporting documentation should be submitted with the response as objective evidence of completion of corrective actions. The acceptability of corrective actions will be assessed through evaluation of the response to each deficiency and will be followed up during the next inspection. If considered necessary, an on-site follow up inspection may be conducted to verify effective implementation of corrective actions.

Or

Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the deficiencies listed in the Inspection Report, the manufacturer was considered to be operating at an unacceptable level of compliance with the relevant GMP Guide.

Another inspection will be required to verify the implementation of corrective actions before the manufacturer's level of GMP compliance can be reconsidered.

Signed on behalf of the inspection team:

Lead Inspector
GMP Inspection Team, Drug Office

Date:

Definitions

Marketing Authorisation

Authorisation to market a medicine through registration with the Drug Office.

Compliance with the marketing authorisation may include compliance with registered formulations, special storage and transportation conditions, shelf life, labelling, etc.

Critical Deficiency

A deficiency that has produced, or may result in a significant risk of producing, a product that is harmful to the user.

Major Deficiency

A non-critical deficiency that:

- has produced or may produce a product which does not comply with its marketing authorisation; and/or
- indicates a major deviation from the relevant GMP Guide; and/or
- indicates a major deviation from the terms of the manufacturing licence or GMP approval (overseas manufacturers); and/or
- indicates a failure to carry out satisfactory procedures for release of batches; and/or
- indicates a failure of the person responsible for QA/QC to fulfil his/her duties; and/or
- consists of several "other" deficiencies, none of which on its own may be major, but which may together represent a major deficiency and should be explained and reported as such.

Other Deficiency

A deficiency that cannot be classified as either critical or major, but indicates a departure from good manufacturing practice.

A deficiency may be "other" either because it is judged as minor, or because there is insufficient information to classify it as major or critical.

One-off minor lapses or less significant issues are usually not formally reported, but are brought to the attention of the manufacturer.

Note:

1. Classification of a deficiency is based on the assessed risk level and may vary depending on the nature of products manufactured, eg in some circumstances a deficiency may be categorised as critical when in other circumstances it would be major.
2. A deficiency that was reported at a previous inspection and not corrected may be reported in a higher classification.

CHAPTER 1
QUALITY MANAGEMENT

QUALITY ASSURANCE
(1). QA system in place and managerial responsibilities are clearly specified. (1.1)

PRODUCT QUALITY REVIEW
(2). Regular quality review of all products. (1.4)

QUALITY RISK MANAGEMENT
(3). QRM system in place. (1.5, 1.6)

CHAPTER 2
PERSONNEL

GENERAL
(4). Organization chart. Adequate staffs with appropriate qualifications and practical experiences. (2.1, 2.2)

KEY PERSONNEL
(5). Key personnel must be full time staff. (2.3)
(6). Job description and qualifications of all key personnel. (2.2, 2.5 – 2.7, 5.1)
(7). Managerial responsibilities clearly specified. (1.1)
(8). Finished products to be released by authorized person before sale. (1.1, 2.5)

TRAINING
(9). Training programme and records for all levels of personnel. (2.8 – 2.12)

PERSONAL HYGIENE
(10). Medical examination and record of all personnel. (2.14)
(11). Personnel engaging in manufacturing not affected by any disease or having opening lesions. (2.15)
(12). All personnel in the manufacturing areas are wearing appropriate protective garments. (2.16)
(13). Control of undesirable activities (e.g. smoking, eating) which might adversely affected product quality. (2.17)
(14). No direct contact of the operator's hand with the exposed product and any part of the equipment that comes into contact with the products. (2.18)
(15). Instruction to staffs to use hand-washing facilities. (2.19)

CHAPTER 3
PREMISES AND EQUIPMENT

PREMISES
(16). Lay-outs of premises and operations in the adjacent area do not present risk of contamination. (3.1)
(17). Premises should be maintained (maintenance operations do not present any hazard to product), cleaned and sanitized according to SOPs. (3.2)
(18). Lighting, ventilation, humidity and temperature adequately controlled during production and storage. (3.3)

(19). Premises adequately protected from entry of insects and rodents (3.4)
(20). Control of unauthorized access in production, storage and QC areas. (3.5, 5.16, 6.4)

PRODCUTION AREA
(21). Dedicated and self-contained facilities for the production of highly sensitizing materials (e.g. penicillin) or biological preparation (e.g. from live micro-organisms) (3.6)

(22). Premises designed and equipments positioned to allow logical sequence of production and to minimize the risk of contamination. (3.7, 3.8)
(23). Interior surfaces should be smooth, free from cracks, not shedding particulate matter and permit easy cleaning. (3.9)
(24). Pipe work, light fittings ventilation points & other services permit easy cleaning and maintenance of such fittings should be accessible from the outside of the manufacturing areas. (3.10)
(25). Drains have trapped gullies, of adequate size and permit easy cleaning and disinfection. (3.11)
(26). Appropriate air handling systems in the production areas (3.12)
(27). Dedicated weighing room for starting materials (3.13)
(28). Adequate dust control and cleaning SOPs at dust generating areas (e.g. sampling, weighing, mixing & processing packaging of dry products). (3.14, 5.11)
(29). Packaging areas designed to avoid mix-ups or cross-contamination. (3.15)
(30). Productions areas should be well lit, particularly where visual on-line controls are carried out. (3.16)
(31). In-process controls not carry any risk for the production. (3.17)

STORAGE AREAS
(32). Adequate storage facilities for starting & packaging materials, intermediate, bulk & finished products, products in quarantine, released, rejected, returned or recalled. (3.18)
(33). Storage conditions should be clean & dry, where special storage conditions are required (e.g. temperature, humidity), these should be provided, checked and monitored. (3.19)
(34). Suitable reception areas for incoming materials (protected from weather, place for the cleaning of containers). (3.20)
(35). Separate quarantine areas (restricted access and clearly marked). Any system replacing the physical quarantine should give equivalent security. (3.21)
(36). Sampling area for starting materials. (3.22)
(37). Segregated areas for the storage of rejected, recalled or returned materials or products. (3.23)
(38). Highly active materials or products (e.g. dangerous drugs, Part I poisons, antibiotics, inflammable or toxic chemicals) should be stored in safe and secure areas. (3.24)
(39). Safe and secure storage places for printed packaging materials. (3.25)

QUALITY CONTROL AREAS
(40) QC laboratories separated from the production areas. (3.26)
(41). Biological, microbiological and radioisotopes laboratories separated from each other. (3.26)
(42). QC laboratories well designed to avoid mix-ups and cross-contaminations. (3.27)
(43). Adequate storage facilities for the storage of samples, references standards and records. (3.27)
(44). Separate rooms to protect instruments from vibration, electrical interference, humidity, etc. (3.28)

ANCILLARY AREAS
(45). Rest and refreshment rooms should be separated from other areas. (3.30)
(46). Adequate changing, washing & toilet facilities. (3.31)
(47). Toilets not directly communicate with production or storage areas. (3.31)

(48). Dedicated tools room in production areas. (3.32)

EQUIPMENT
(49). Production equipment suited for its intended purposes. (3.34)
(50). Repair and maintenance operations not hazardous to products. (3.35)
(51). Production equipments thoroughly cleaned according to SOPs and stored only in clean and dry conditions. (3.36)
(52). Appropriate washing and cleaning equipment. (3.37)
(53). Equipment should be installed in such a way to prevent any risk of error or of contamination. (3.38)
(54). Production equipment not affecting the quality of the products. (3.39)
(55). Balances and measuring equipment of appropriate ranges and precision. (3.40)
(56). Measuring, weighing, recording and control equipment are regularly calibrated and the record retained. (3.41)
(57). Pipeworks properly labeled to indicate the content and direction of flow. (3.42, 5.14)
(58). Pipes for distilled, deionized or other appropriate water sanitized according to SOPs. The action limits for microbiological contamination and the measures to be taken specified. (3.43)
(59). Defective equipment removed from production and QC areas or at least be clearly labeled. (3.44)

CHAPTER 4
DOCUMENTATION

GENERATION AND CONTROL OF DOCUMENTATION
(60). Site master file.
(61). Appropriate controls for electronic documents such as templates, forms, and master documents. (4.1)
(62). Appropriate controls to ensure the integrity of the record throughout the retention period. (4.1)
(63). Precautionary measures taken during reproduction of working documents from master documents. (4.2)
(64). Appointment of authorized persons for approving SOPs. Documents should be approved, signed and dated by appropriate and authorized persons and the effective date specified. (4.3)
(65). Evidence of regular review of documents. (4.5)
(66). Documents should not be hand-written except entry of data. (4.6)

GOOD DOCUMENTATION PRACTICE
(67) Handwritten entries should be made in clear, legible, indelible way. (4.7)
(68). Record should be made or completed at the time each action is taken. (4.8)
(69). Any alteration made to the entry on a document should be signed, dated and reason for the alteration recorded where appropriate. (4.9)

RETENTION OF DOCUMENTS
(70) Secure controls must be in place to ensure the integrity of the record throughout the retention period. (4.10)
(71). Batch documents to be kept one year after expiry of the batch or five year after release of the batch, whichever is the longer. (4.11)
(72). Batch documents for investigational medicinal products to be kept for at least five years after the completion or formal discontinuation of the last clinical trial in which the batch was used. (4.11)

(73). Raw data (for example relating to validation or stability) should be kept for an appropriate period of time. (4.12)

SPECIFICATIONS
(74). Specification for starting and packaging materials. (4.13, 4.14)
(75). Specification for intermediate and bulk products. (4.15)
(76). Specification for finished products (4.16)

MANUFACTURING FORMULA AND PROCESSING INSTRUCTION
(77). Manufacturing formula for each product (batch size stated). (4.17)
(78). Processing instructions for each product (batch size stated). (4.18)
(79). Packaging instruction for each product, pack size and type stated. (4.19)
(80). Keeping of batch processing record. (4.20, 5.8)
(81). Keeping of batch packaging record. (4.21, 5.8)

PROCEDURES AND RECORDS
(82). SOPs and record of receipt of each delivery of starting material (including bulk, intermediate or finished goods). (4.22, 4.23, 5.6)
(83). SOPs and record of the receipt each delivery of primary packaging materials. (4.22, 4.23)
(84). SOPs and record of the receipt each delivery of secondary packaging materials. (4.22, 4.23)
(85). SOPs and record of the receipt each delivery of printed packaging materials. (4.22, 4.23)
(86). SOPs for the internal labeling, quarantine and storage of starting materials and other materials. (4.24, 5.2, 5.5, 5.42)
(87). SOPs for sampling procedures. (4.25, 5.2, 5.28, 6.11, 6.12)
(88). SOPs for testing procedures of materials and products at different stages of manufacture. (4.26)
(89). SOPs for the release and rejection of materials and products. (4.27)
(90). Product distribution record. (4.28)
(91). Written policies, SOPs, protocols, reports and the associated records of actions taken or conclusion reached : (4.29)

- (a) validation and qualification of processes
- (b) validation and qualification of equipment
- (c) validation and qualification of systems
- (d) equipment assembly and calibration
- (e) technology transfer
- (f) signature lists
- (g) training in GMP and technical matters, clothing and hygiene and verification of the effectiveness of training
- (h) environmental monitoring
- (i) pest control
- (j) complaints
- (k) recalls
- (l) returns
- (m) change control
- (n) internal quality/GMP compliance audits
- (o) summaries of records where appropriate (e.g. product quality review)
- (p) supplier audits

(92). SOPs for t operating manufacturing and test equipment (4.30)
(93). Logbooks and record for major or critical analytical testing & production equipment. (4.31)
(94). Keeping of a documents list. (4.32)

CHAPTER 5
PRODUCTION

GENERAL
(95). All materials and products should be stored under appropriate conditions and in an orderly fashion to permit batch segregation and stock rotation. (5.7)
(96). Operation on different products should not be carried out simultaneously or consecutively in the same room unless there is no risk of mix-up or cross-contamination. (5.9)
(97). At every stage of processing, products and materials should be protected from microbial and other contamination. (5.10)
(98). Production areas labeled for the production being carried out. (5.12)
(99). Status labels to be affixed to containers, equipment and premises. (5.13)
(100). SOPs and records for deviation. (5.15)
(101). Production of non-medicinal products should be avoided. (5.17)

PREVENTION OF CROSS-CONTAMINATION IN PRODUCTION
(102). Measures for prevention of contamination and cross-contamination. (5.19, 5.20)

VALIDATION
(103). Validation on processes. (5.21 – 5.23, 5.37)
(104). Processes revalidation programme. (5.24)

STARTING MATERIALS
(105). Approved suppliers list and specifications from supplier. (5.26)
(106). Checking of container integrity and supplier's label. (5.3, 5.27)
(107). Labeling of starting materials. (5.13, 5.29, 5.30)
(108). Only approved and unexpired starting materials to be used. (5.31)
(109). Dispensing SOP and record. (5.32, 5.33, 5.34)

PROCESSING OPERATIONS-INTERMEDIATE AND BULK PRODUCTS
(110). Line clearance performed before any processing operation is started. (5.35)
(111). Storage conditions of intermediate and bulk products. (5.36)
(112). Performance and record of in-process controls and environmental controls. (5.38)
(113). Deviation recorded and investigated. (5.39)

PACKAGING MATERIALS
(114). Approved suppliers list and specifications from supplier (5.40)
(115). SOP of storage & issuance of printed materials. (5.41)
(116). Special precautionary measure for handling of cut labels (5.41)
(117). Outdated or obsolete primary and printed materials should be destroyed and disposal record be kept. (5.43)

PACKAGING OPERATIONS
(118). Segregation of packaging operations. (5.44)
(119). Line clearance performed prior packaging operation. (5.45)
(120). Packaging operation displayed at each packaging station or line. (5.12, 5.46)
(121). Containers for filling should be clean before filling. (5.48)
(122). Issuance of packaging materials checked against PBPR. (5.47)
(123). Precautionary measures taken to avoid the mix-ups and mislabeling after filling. (5.49)
(124). Precautionary measures taken during printing operations. (e.g. code numbers, expiry dates)

and the printing should be distinct & resistant to fade or erasing (5.50, 5.51, 5.53)
(125). In-process controls performed and samples taken away from the packaging line should not be returned. (5.54)
(126). Deviation recorded and investigated. (5.55, 5.56)
(127). Disposal of batch-coded and returned of uncoded printed materials should be recorded. (5.57)

FINIDHED PRODUCT
(128). Finished products to be stored in approved conditions. (5.58, 5.60)

REJECTED, RECOVERED AND RETURNED MATERIALS
(129). Rejected materials and products should be labeled and properly stored. Record of disposal or return to be kept. (5.61)
(130). Reprocessing of rejected products and recovery of all or part of earlier batches should be recorded. (5.62, 5.63)
(131). Additional tests on finished products which incorporated a recovered product or been reprocessed. (5.64)
(132). SOPs of returned product. (5.65)

CHAPTER 6
QUALITY CONTROL

GENERAL
(133). Qualifications and job descriptions of head of QC department (6.1, 6.2)

GOOD QUALITY CONTROL LABORATORY PRACTICE
(134). Appropriate personnel, premises and equipment in the laboratory. (6.5, 6.6)

DOCUMENTATION
(135). Batch QC documentation to be retained for one year after the expiry date of the batch. (6.8)
(136). Trend analysis on some kinds of data e.g. analytical tests results, yields, environmental controls etc. (6.9)
(137). Original data such as laboratory notebooks and/or records should be retained and readily available (6.10)

SAMPLING
(138). Labeling of sample containers. (6.13)
(139). Retention of reference samples. (6.14)

TESTING
(140). Testing should be carried out according to validated analytical methods. (6.15)
(141). Record of testing of materials and products. (6.16, 6.17)
(142). In-process controls should be performed and the results recorded. (6.18)
(143). Testing reagents, reference standards and culture media made up according to written procedures and labeled properly. (6.19, 6.20)
(144). Storage, receiving record of substance used for testing operation and record of performance of identity test on reagent materials (6.21)

ON-GOING STABILITY PROGRAMME
(145). SOPs of on-going stability studies. (6.24, 6.25, 6.29, 6.30)

(146). Written protocol for on-going stability programme and the results should be evaluated and maintained. (6.26 – 6.28, 6.31 – 6.33)

CHAPTER 7
CONTRACT MANUFACTURE AND ANLAYSIS

GENERAL
(147). Documents for contract production and analysis. (7.1, 7.2)
(148). Responsibilities of contract giver. (7.3 – 7.5)
(149). Responsibilities of contract acceptor. (7.6 – 7.9)
(150). Technical aspects of contract (7.10 – 7.13)
(151). Contract giver and the competent Authorities permitted to audit contract acceptor. (7.14, 7.15)

CHAPTER 8
COMPLAINTS AND PRODUCT RECALL

(152). Appointment of person responsible for complaints and recalls. (8.1, 8.9)
(153). SOPs and record of complaint. (8.2, 8.3, 8.5)
(154). Follow-up actions taken. (8.4, 8.6 – 8.8)
(155). SOPs and record of recall. (8.10 – 8.16)

CHAPTER 9
SELF INSPECTION

(156). Date of last self inspection.
(157). SOPs for self inspection (9.1 – 9.2)
(158). Self inspection report should include observation made during the inspection, proposals for corrective measures and subsequent actions taken. (9.3)

Secondary Packaging Manufacturer Inspection Report Form /7A/

Name of Manufacturer: _____

Address and telephone: _____

_____

Date of Inspection: _____

Last inspection: _____

Inspector in charge: _____

Assisting inspector(s): _____

Particulars of Manufacturer

Name of Person i/c of Secondary Packaging: _____

Qualification of Person i/c of Sec. Packaging: _____

No. of pharmaceutical products handled: _____

No. of packaging line(s): _____

Type of secondary packaging operation handled :

	Yes	No
- Affixing additional label(s) on labeled containers	☐	☐
- Affixing label(s) on unlabeled containers	☐	☐
- Addition or replacing packaging inserts	☐	☐
- Repackaging of packaged products into different pack size	☐	☐
- Packaging of unlabeled parenteral products	☐	☐
- Products require cold chain	☐	☐
- Others (Please specify) _____	☐	☐

No. of staff engaged in

	Full time	Part time
Secondary Packaging :		
Quality control :		

Sections 1 and 2 Quality Management and Personnel

		Yes	No	Remarks
1.	Establishment of a quality management system (1.1 - 1.4)	☐	☐	
2.	Quality risk management concept incorporated in the quality management system (1.5, 1.6)	☐	☐	
3.	Organization chart (2.2)	☐	☐	
4.	Job description and qualification of person in charge of secondary packaging (2.2 - 2.4, 2.6, 2.7)	☐	☐	
5.	Job description and qualification of quality assurance officer (2.2, 2.3, 2.5, 2.6, 2.8)	☐	☐	
6.	Finished product to be released by QA Officer before sale (2.5)	☐	☐	
7.	Training program and records for all levels of personnel (2.9, 2.10)	☐	☐	
8.	Eye examination upon recruitment and re-examination, if necessary (2.13)	☐	☐	
9.	Appropriate protective clothing and personal hygiene (2.14)	☐	☐	
10.	Hygiene programme and instruction to use hand washing facilities (2.12, 2.16)	☐	☐	
11.	Control of undesirable activities (e.g. smoking, eating) which might adversely affect product quality (2.15)	☐	☐	
12.	Control of unauthorised access (2.11, 3.6, 3.15)	☐	☐	

Follow up actions required / further remarks:

Section 3 Premises and Equipment

	Yes	No	Remarks
13. Lay-out of packaging and ancillary areas (3.1, 3.2, 3.19, 3.20)	☐	☐	
14. Premises maintained, cleaned and sanitized according to SOPs (3.3)	☐	☐	
15. Premises adequately protected from entry of insects or other animals (3.5)	☐	☐	
16. Lighting, ventilation, humidity and temperature adequately controlled during manufacturing and storage (3.4)	☐	☐	
Storage Areas			
17. Sufficient storage area with temperature and humidity adequately controlled, monitored and recorded (3.12, 3.13)	☐	☐	
18. Suitable reception area for incoming materials. Receiving and dispatch bays should protect materials and products from the weather. (3.14)	☐	☐	
19. System for quarantine of products (3.15, 5.2)	☐	☐	
20. Separate storage area and quarantine area for all incoming materials (3.12, 5.3)	☐	☐	
21. Separate storage area and quarantine area for finished products (3.12)	☐	☐	
22. Separate store for rejected, recalled or returned materials or products (3.16, 8.16)	☐	☐	
23. Highly active materials or products stored in safe and secure areas (3.17)	☐	☐	
24. Safe and secure storage for printed packaging materials (3.18)	☐	☐	

Follow up actions required/further remarks:

		Yes	No	Remarks
	Secondary Packaging Areas			
25.	Premises designed and equipment positioned to allow logical sequence of production and to minimize risk of mix-up or contamination (3.7, 3.8)	☐	☐	
26.	Secondary packaging area be well lit and effectively ventilated with appropriate air handling systems and regularly monitored. (3.9, 3.10)	☐	☐	
27.	SOP for handling of spillage or breakage involving products containing highly active substances or highly sensitizing substances. (5.19)	☐	☐	
28.	In-process control do not carry risk to packaging operation (3.11)	☐	☐	
	Equipment			
29.	List of production and QC equipment	☐	☐	
30.	Machines dismantled and installed according to SOPs (3.23,4.26)	☐	☐	
31.	Balances and other measuring equipment of appropriate ranges, precision and are regularly calibrated. (3.25, 3.26)	☐	☐	
32.	Equipment used in connection with packaging operation thoroughly cleaned according to schedule (3.22, 4.26)	☐	☐	
33.	Equipment used in connection with packaging operation not affect the quality of the product (3.21)	☐	☐	
34.	Defective equipment removed from packaging areas or at least be clearly labelled (3.27)	☐	☐	

Follow up actions required/further remarks:

Section 4 Documentation

	Yes	No	Remarks
35. Appointment of authorised person for approving SOPs. Documents should be approved, signed and dated by authorized person (4.3,4.4)	☐	☐	
36. Documents regularly reviewed and kept up-to-date (4.6)	☐	☐	
37. Keeping of batch packaging records (4.12, 4.18)	☐	☐	
38. Line clearance checked and recorded before starting each step of production and packaging (5.20)	☐	☐	
39. SOPs for operating instruments and equipment (4.27)	☐	☐	
40. SOPs for unique numbering and record of unique number allocation for each packaging run (5.23)	☐	☐	
41. SOPs and records for release/rejection of materials and products. (4.23, 5.8)	☐	☐	
42. Product distribution records (4.24, 4.25)	☐	☐	

Follow up actions required/further remarks:

	Yes	No	Remarks
43. SOPs and records for: (4.26)			
(a) equipment assembly and calibration	☐	☐	
(b) maintenance, cleaning and sanitation	☐	☐	
(c) personnel matters	☐	☐	
(d) environmental monitoring	☐	☐	
(e) pest control	☐	☐	
(f) change control	☐	☐	
(g) complaints, recalls and returns (5.34-5.39)	☐	☐	
(h) investigation into deviations and non-conformances	☐	☐	
(i) Others	☐	☐	
44. SOPs for sampling procedures (4.21, 5.8)	☐	☐	
Starting Materials			
45. Specifications for starting materials (4.14, 4.15)	☐	☐	
46. SOPs and records for receipts of starting materials (4.19)	☐	☐	
47. SOPs for quarantine and storage of starting materials (4.20)	☐	☐	
Finished Products			
48. Specifications for finished products (4.14, 4.16)	☐	☐	
49. SOPs for quarantine and storage of finished products (4.20, 5.32, 5.33)	☐	☐	

Follow up actions required/further remarks:

	Yes	No	Remarks
Packaging Materials			
50. Specification for printed and packaging materials (4.14, 4.15)	☐	☐	
51. Packaging instructions and batch packaging record for every product (4.17, 4.18)	☐	☐	
52. SOPs and records for receipts, quarantine and storage of printed and packaging materials (4.19,5.13-5.16)	☐	☐	
53. SOPs for internal labelling of starting, printed, packaging and other materials (5.9, 4.20)	☐	☐	

Follow up actions required/further remarks:

Section 5 Secondary Packaging Operations

		Yes	No	Remarks
54.	Packaging station or line clearly labelled for the product being handled (5.21)	☐	☐	
55.	Measures for prevention of mix-ups or substitutions (5.4, 5.18)	☐	☐	
56.	SOPs and records for deviations, investigation and corrective action on yield (4.26,5.6, 5.30)	☐	☐	
57.	Checks on correct performance of printing operations as well as checks on electronic code readers, label counters (5.24, 5.26, 5.27)	☐	☐	
58.	SOPs and records for In-process control (4.17, 4.18,5.28)	☐	☐	
59.	Labels applied to containers, equipment or premises should be clear and unambiguous (5.5)	☐	☐	
60.	Measures to assure identity of content of every container of starting material (5.10)	☐	☐	
61.	Special precautionary measure for handling cut labels and overprinting carried out off line (5.25)	☐	☐	
62.	SOP and records for destruction and disposal of unwanted packaging materials (obsolete or unused coded) (5.17, 5.31)	☐	☐	
63.	Record of damage of containers of starting materials (5.7)	☐	☐	
64.	Content of labels of starting materials (5.9)	☐	☐	
65.	Procedure and records for checking of products on delivery to the secondary packaging area (5.22)	☐	☐	
66.	Procedure and records for issuance of starting, printed and packaging materials (5.11, 5.16)	☐	☐	

Follow up actions required/further remarks:

Section 6 Quality Control

		Yes	No	Remarks
67.	Persons responsible for quality control should be independent of secondary packaging operation (6.2)	☐	☐	
68.	SOP and records of testing of starting materials and assessment of finished products (6.3, 6.7)	☐	☐	
69.	Record of sampling and test of starting materials (6.4, 4.21)	☐	☐	
70.	Record of sampling and quality control of packaging materials (6.6, 4.21)	☐	☐	
71.	Testing of products received in the form of unlabeled containers (6.5)	☐	☐	
72.	Record of actual analysis of starting materials OR certificates of analysis from the supplier (6.3, 6.4)	☐	☐	
73.	Reference and retention samples of finished products from each batch to be kept for one year after expiry and of a size sufficient to permit at least two full re-examinations (6.8 - 6.11)	☐	☐	

Follow up actions required/further remarks:

Section 7 Contract packaging and analysis

	Yes	No	Remarks
74. Documents for contract production and analysis (7.1)	☐	☐	
75. Responsibilites of contract giver and contract acceptor (7.3 -7.9)	☐	☐	
76. Contract giver permitted to audit contract acceptor (7.14)	☐	☐	
77. Technical aspects of contract including the party responsible for release of the products for sale, purchase of materials, quality control, (7.10 – 7.13)	☐	☐	
78. Contract should specify contract acceptor may subject to inspection by Drug Office (7.15)	☐	☐	

Process(es) contracted out / in	Name of contract acceptor(s)/ giver(s)

Follow up actions required / further remarks:

Section 8 Complaints and Recalls

	Yes	No	Remarks
79. Appointment of quality assurance officer as the person responsible for complaints and recalls (8.1, 8.11)	☐	☐	
80. SOP for handling complaints including system to inform Drug Office if action considered following possible faulty manufacture, product deterioration, counterfeiting or serious quality problem (8.2, 8.9)	☐	☐	
81. Complaints be carefully reviewed and investigated according to SOPs and recorded (8.2 - 8.5)	☐	☐	
82. Records of decisions and measures taken (8.6)	☐	☐	
83. Periodic review of complaints and attention given to decide if complaint was caused because of counterfeiting (8.7, 8.8)	☐	☐	
84. SOPs for recalls including system to inform all competent authorities(8.10, 8.12, - 8.14)	☐	☐	
85. Keeping of distribution records (8.15)	☐	☐	
86. System to document records of recall including progress, final report as well as reconciliation and effectiveness of the recall (8.17, 8.18)	☐	☐	

Section 9 Self Inspection

	Yes	No	Remarks
87. Program for self-inspection (9.1, 9.2)	☐	☐	
88. Appointment of competent persons to conduct self-inspection (9.3)	☐	☐	
89. SOP and record of self-inspection (9.4)	☐	☐	
90. Results, proposed CAPA and action taken relating to Self-inspection (9.4)	☐	☐	

Follow up actions required/further remarks:

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Pharmacist
Dept. of Health