

PHARMACEUTICAL INSPECTION CONVENTION PHARMACEUTICAL INSPECTION CO-OPERATION SCHEME

> PI 023–2 25 September 2007

AIDE-MEMOIRE

# INSPECTION OF PHARMACEUTICAL QUALITY CONTROL LABORATORIES

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# 1. DOCUMENT HISTORY

Adoption by the PIC/S committee	13 September 2005	
Entry into force	1 January 2006	

## 2. INTRODUCTION

Inspections of sites involved in testing of medicinal products should be more and more specific, thorough and conducted under normal working environment. These inspections may include a complete assessment of laboratory's conformance with the code of GMP or they may be limited to specific methodology or aspects of the laboratory. Inspection process of a laboratory involves the assessment of laboratory functions in full operation. Consequently, PIC/S has developed the Aide Memoires, which can be considered a good tool for enhancing the understanding and performance of inspectors.

## 3. PURPOSE

- **3.1.** The purpose of this document is to provide guidance for GMP inspectors to assist in training and preparing for inspections.
- **3.2.** The Aide-Memoire was drafted with the aim of facilitating effective planning and conducting of GMP inspections of laboratories. The Aide-Memoire should enhance the efficiency of the GMP inspection and evaluation process.

# 4. SCOPE

- **4.1.** This document applies to laboratories for testing of the finished medicinal products, intermediates, starting materials for the production of medicinal products and in-process controls.
- **4.2.** At the time of issue, this document reflected the current state of the art. It is not intended to be a barrier to technical innovations or the pursuit of excellence.

## 5. AIDE-MEMOIRE

The AIDE MEMOIRE in Annex consists of 9 tables containing general subjects and items to be investigated during the GMP inspection of laboratories. Some important questions and relevant references to the PIC/S documentation are included as well.

Some more and specific aspects to be investigated by inspectors, respecting the special type of laboratory and nature of testing, are included in two supplements of Annex.

## 6. **REVISION HISTORY**

Date Version Number		Reasons for revision
25 September 2007	PI 023-2	Change in the Editor's co-ordinates

#### AIDE-MEMOIRE

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Supplement No.1: GMP inspection in chemical and physical-chemical laboratories Supplement No.2: GMP inspection in microbiological laboratories

#### Explanation to all tables below: PIC/S G. = PIC/S Guide to GMP; It.= item ; SMF = Site Master File; IPCs= in process controls; EuPharm= 4<sup>th</sup>ed. 2002; VMP = Validation Master Plan;

1.	GENERAL					
	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents		
1.	General information	<ul> <li>Name of the establishment</li> <li>Physical address, phone No., FAX No. Email</li> <li>Postal address</li> </ul>	Who is the contact person (name, phone No, e- mail)			
1.1.	Test activities	QC laboratory status and activities on site	<ul> <li>Licensed by a competent national authority</li> <li>Regularly inspected by a <u>competent national</u> <u>authority</u></li> </ul>	PIC/S G. 1;		
1.2.	Activities contracted out (Contract testing)	<ul> <li>Name(s)/ address/addresses) of the company / companies</li> <li>Type of activities, written contract</li> </ul>	<ul> <li>Licensed by a competent national authority</li> <li>Evaluation / Re-evaluation of the contract laboratory by the <u>customer (contract giver)</u></li> </ul>	PIC/S G. 7.1; 7.15; 7.13		
2.		QUALITY A	SSURANCE SYSTEM			
2.1.	General	<ul> <li>QA system description; definition of the quality policy and legal conditions</li> <li>Organisation chart /QA staff</li> <li>Functionality of QA</li> </ul>	<ul> <li>Document available?</li> <li>Key personnel; reporting lines, responsibilities and release criteria clearly defined?</li> <li>Review period (procedures, processes)</li> </ul>	PIC/S G. 1.2.; 1.4. PIC/S G.1; 2.6; 2.7; 6.1 and Annex 16		
2.2.	Suppliers quality ensuring	<ul> <li>Suppliers approvals, contracting</li> <li>Purchasing control/vendors evaluation</li> </ul>	<ul> <li>Policy for supplier's quality assessment defined?</li> <li>Audits, qualification/ evaluation made?</li> </ul>	PIC/S G. 1.2.; 4.14; 5.25 and Annex 2; It. 25; Annex 8 It.3		
2.3.	Self inspection	Self inspection / audit system and performance	<ul> <li>How and by whom performed? How reported?</li> <li>How are corrective measures implemented?</li> <li>Schedule available and is adhered to?</li> </ul>	PIC/S G . 1.2.; 9.1 9.2.; 9.3.		
2.4.	Trending	Results/OOS-results	Do you assess trends? How and by whom are trends evaluated? SOP exists?	PIC/S G . 6.9.		
2.5.	Change control	System, responsibilities, follow up actions	How are changes documented, managed, controlled?	PIC/S G. 1.3. ; Annex 15. lt.43.		
2.6.	Risk management	Risk management method/approach	<ul><li>Are all critical parameters included?</li><li>How is this related to validation process?</li></ul>	PIC/S G.Annex 15. It44		

3.	DOCUMENTATION					
	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents		
3.1.	General information	<ul> <li>System description (preparation, revision. distribution, archiving) of documentation (change control)</li> <li>Handling of copies from controlled documents</li> <li>Syntax of documents (electronic or paper)</li> </ul>	<ul> <li>Defined in writing (format, numbering system, approval criteria, distribution, return, interval for revision etc.).</li> <li>How is the process of archiving managed (location, protection)?</li> <li>SOP comprises the authorisation for copying, identification of copies from official and controlled documents?</li> </ul>	PIC/S G. 4.14.11 Annex 18 It.6.7 6.10.		
3.2.	Laboratory documentation	Specifications (SPECs)	Specifications are consistent with the information currently held in the dossier?	PIC/S G. 1; 4.14.3		
		• SOPs	<ul> <li>Exists for, sampling, testing, equipment handling and other laboratory processes? Are they complete? Where are previous versions archived?</li> <li>Standard form introduced?</li> </ul>	PIC/S G . 4.4. 4.194.29		
		Test instructions, analytical procedures, methods	<ul> <li>Specifying equipment, methods? Working details described?</li> <li>Comply with licence dossier</li> </ul>	PIC/S G . 4.154.18.		
		Test records/test batch protocols	Data comply with SPECs/instructions, complete, signed, alterations commented?	PIC/S G . 4.1.;-4.8.		
		Log books	<ul> <li>What is the form and content of the personnel analytical notebooks, worksheets, general lab notebooks?</li> <li>Exists for equipment, calibration, maintenance, standards, sample receipt etc.?</li> <li>Standard form includes complete data (lab staff identity, dedication, data to be recorded etc)? Paginated?</li> </ul>	PIC/S G . 4.284.29		
		Raw data /e.g. chromatograms, spectra, results), out prints	<ul> <li>What is your definition of raw data?</li> <li>Recorded/attached directly into relevant laboratory notebooks data (no scrap or loose paper)</li> </ul>			
3.3.	Data traceability	Procedure, record on receipt and usage of materials, standards	<ul> <li>How is traceability ensured? How is the system of identification defined (e.g. how is traceability of working standards to primary standards ensured)?</li> </ul>	PIC/S G . 4.8.; 6.17-		
		Sample tracking	<ul> <li>How is the (identified) "history" of sample recorded (receipt log, storage conditions, handling, security, safety data etc.)</li> </ul>			
		Analytical raw data traceability Note: For questions see It 9.1. below				
3.4.	Electronic documentation/ computerised systems	Electronic locumentation/ computerised co				

4.	PERSONNEL					
	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents		
4.1.	General	<ul> <li>Number of employees (total); specified to positions and different testing</li> <li>QC Manager and deputy (other key personnel)</li> </ul>	<ul> <li>The number is adequate? What is the annual average staff turnover?</li> <li>Is there a document specifying qualifications, experiences, duties, responsibilities and staff presence on site?</li> </ul>	PIC/S G 2.8; 2.9; 6.6.;		
4.2.	Training	<ul> <li>Training system, programme/plan</li> <li>Training on special reasons</li> </ul>	<ul> <li>System is described? Who is responsible? Who trains (trainer's qualification)?</li> <li>Is a competent list available and updated regularly?</li> <li>What specific training is given e.g. maintenance, cleaning staff etc.)?</li> </ul>	PIC/S.G. 2.6 viii; 2.8; 2.9. 2.10.; 2.20 PI 012-1, 7.17.3.		
		<ul> <li>Documentation on training</li> <li>Evaluation of training effectiveness</li> </ul>	<ul> <li>SOP/records on training exist? Was programme fulfilled?</li> <li>What is the interval for training re-evaluation?</li> </ul>			
		(evaluation and re-evaluation)				
5.		PREMISES	AND EQUIPMENT			
5.1.	Premises	Location of the QC laboratories	Are QC labs separated from production areas?	PIC/S G 3. 26 3.29.; 6.5.; 6.6		
		<ul> <li>Facility design, rooms separation (e.g. clean and dirty, different testing activities).</li> </ul>	<ul> <li>Where type of testing is carried out e.g. chemical, biological (microbiological) testing? Is the laboratory equipment located in appropriate area (e.g. clean equipment in clean room)?</li> </ul>	PIC/S G. 3.1.		
		Temperature, humidity, ventilation and recording systems/alarms.	<ul> <li>How is the system of ventilation/humidification/temperature designed? Is it monitored continuously? Is this system separated for QC area from other areas? System of alarms for critical equipment exists?</li> </ul>	PIC/S G. 3.3.		
		Storage areas (e.g. for documents, for samples etc.)	How are the documents/sensitive instruments protected? Are storage conditions monitored? Where is defective equipment stored?	PIC/S G. 4.8.; 4.9.; 3.44.		
		Labelling	<ul> <li>Is there clearly indicated dedication of rooms, areas (directions), status?</li> </ul>			
			Are dedicated rooms/laboratories clearly identified?			
5.2.	Equipment	Instrumentation	• Brief description of major equipment available?	PIC/S G. 3.34 - 3.44		
		Assembly (DQ,IQ,OQ,PQ)	<ul> <li>Relevant validation documents, SOP(s) for line with qualified assembly and documentation of all possible configurations available? Appropriate environmental conditions clearly stated?</li> </ul>	2.6.vii		
		Calibration	<ul> <li>Calibration procedures defined in writing? Documentation (e.g. records) available? Intervals for calibration defined? Calibration status indicated?</li> </ul>			
		Labelling	Equipment status indicated?			
		Log books	• Exist for every major equipment? Are data complete (see also item 3.2. above)?	2.6.vi		
		Cleaning     Note see also item 5.4. below	• SOP(s) exists? Records available (require for critical equipment (as applicable)?			

			EQUIPMENT - continued	1
	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents
5.3.	Equipment	Qualification	• IQ, OQ, PQ was carried out prior to first use?	PIC/S G.
	validation	Design qualification (DQ)	<ul> <li>Who approves? Fully documented (including possible involvement of suppliers and/or third party)?</li> </ul>	2.6.vii; and Annex 15
		Installation qualifications(IQ)	<ul> <li>Included intervals for revalidation? Requirements and specification for delivered equipment (URS) exists? Relevant checks were made?</li> </ul>	
		Operational qualifications (OQ)		
		• Performance qualifications (PQ) Note: For more details on PQ of different laboratory apparatuses see Supplements 1 and 2 to this Aide.	<ul> <li>Details on specifications and acceptance criteria are provided? Operators have been trained?</li> <li>Sufficient details of procedures, materials and certified reference materials are available? Results are recorded in a manner amenable to establishing trends? Results are checked and evaluated by supervisor or delegate? Raw data are consistent with data in summary report? Results are within acceptance criteria applied?</li> </ul>	
5.4.	Cleaning sanitation	Cleaning/sanitation system	<ul> <li>Validation was carried out? Relevant documents available? What are the limits for equipment cleaning?</li> </ul>	PIC/S G. 3; 3.37
			Which equipment, glassware and other containers are used for cleaning/sanitation?	
			• Who cleans? What are the intervals for cleaning areas specified? SOP?	
5.5.	Maintenance	• System	How is maintenance programmed, performed and documented? Are the critical systems, areas, equipment included? Which work is contracted?	PIC/S G. 3.2.
		Preventive maintenance	<ul> <li>Are the regular/extraordinary maintenance programs available? Who "releases" equipment after maintenance/repair for laboratory performance?</li> </ul>	
		Documentation	<ul> <li>Is there a schedule including time frames available? Is there inventory of items to be included into the maintenance system? Is there system for the formal acceptance of equipment back into service (and vice versa)?</li> </ul>	
6.		MATERIALS AND	) SUPPLIES	
6.1.	Materials	Laboratory reagents, standards	<ul> <li>List(s) of materials available? The suppliers are listed, assessed? (see also item 2.2. above) What are requirements of identification tests? How is labelling (e.g. date of receipt)? Testing kits used? How new lots are traced back to the previous lots?</li> </ul>	PIC/S G. 6.196.21.
		Reference substances )RM	<ul> <li>How are RM handled, labelled, stored (expiration)? Primary standards are available? Which? Are the secondary RM are acceptable? Traceability to official standards assessed? Working standards prepared? How used? Is there an SOP for the in-house calibration of reference materials. How expiry date and potency value are assigned to each reference material characterised in –house?</li> </ul>	
		<ul> <li>Handling of highly toxic, hazardous and sensitising materials, poisons</li> </ul>	<ul> <li>How are these materials handled (stored)? Are there relevant instructions available? Which measures are introduced to avoid cross- contamination? SOP for waste disposal available?</li> </ul>	

	Area of	Notes		Crucial guestions	Supporting
	operation / items	Notes		« show me»	documents
6.2.	Water and water systems	<ul><li>Water system/quality</li><li>Water sampling</li></ul>		Is the laboratory water system described? How is the laboratory water prepared? Water quality is defined (SPECS)? What is the quality of water used for microbiological testing?	Annex 1 to PIC/S G. It.35;44
				Where, when and how is your laboratory water sampled (SOP)?	
		Water testing		What kind of quality testing is done for your water used for different types of analyses?	
7.		SAMPLING	AND	SAMPLES	
7.1.	Sampling	General policy		Show me the description of sampling system (authorisation, statistics application, sampling tools/areas)! What is the number of samples taken and justification for reduced sampling?	PIC/S G. 1.4; 6.11- 6,14 and Annex 8
		Sampling	•	Sampling performed how? By whom? SOP(s) for sampling available? Includes the details on containers, labelling, equipment cleaning etc.?)	lt.1.9. PI 012-1; 11.1
		Place of sampling for raw materials		Is there separate sampling area or area in stores? How is the risk of cross contamination/bacterial contamination prevented?	Annex 8 to PIC/S G.1.
			•	What is the representative amount of sample as defined in the SOP?	lt.2- 5
		<ul> <li>Starting/packaging materials sampling</li> </ul>		System of IPC's/intermediates sampling described (SOP)?	
		<ul> <li>IPC's sampling /Intermediates sampling</li> </ul>		What type of air sampler is used and why? What is the sample volume/testing time, media used, transfer time (SOPs)? Is equipment calibrated (protocol)? What disinfection procedure is used?	PIC/S G. 6.76.11
		System of air sampling	•	See item 6.2. above	
				What sampling techniques including equipment used?	
		System of water sampling		Show me the store for retained samples of raw materials and final products! SOP (time period, number specified?) exists?	
		Procedures/records			
		Retained samples			
		Re-sampling     Note: for re-sampling see item     9.3.below			
7.2.	Samples	Handling of samples		How are the composite samples blended? How are (labelled, transferred, registered, distributed) samples for testing and contract testing handled (if applicable)? SOP(s) available? Proper accountability of samples assessed? Are there used some contract facilities? Responsibilities defined?	PIC/S G. It. 6.4.; and Annex 8 It. 6 - 9
		<ul> <li>Retained samples</li> <li>Samples tracking Note: For samples tracking see Item 3.2. above</li> </ul>	•	The amount, time period, storage conditions defined? How long are samples stored prior testing? Show me the documentation!	PIC/S G. 64 6.14.

	SAMPLING AND SAMPLES - continued				
	Area of operation / items	Notes		Crucial questions « show me»	Supporting documents
7.3.	Personnel for sampling	• Staff	•	Specifically trained?	Annex 8 to PIC/S G. It. 2; PI 007 1, 8.18.9.
8.		ТІ	STIN	NG	
8.1.	Testing general	QC system	•	Written document available? Which types of testing performed (e.g. microbiological, immunological, chemical etc.)?	PIC/S G.6.15-6.21 PI 012-1,
		Flow sheets	•	Specifying important steps?	11.2.
		<ul> <li>Methods (see also item 8.2. below)</li> </ul>	•	Which methods are used for testing: standardised (e.g. Pharmacopoeial), modified or developed "in house?	
		Contract testing     Re-testing	•	Which analyses are performed on contract? (see also item 1.2. above)	
		Note: for re-testing see Item 9.3.below			
8.2.	Testing of raw materials	System	•	Procedure(s) available? SPECs exists? Comply with marketing authorisation? Which is extend of (all raw material tested, full testing made)? Identity testing made? Which materials are released on base of supplier's certificate?	PIC/S G. 4.10; 5.31 and Annex 8, It.3-4
		Methods	•	Approved/validated? Acceptance limits specified?	
8.3.	Testing in process, controls (IPC)	Testing methods/equipment	•	Procedures available? Approved, validated? By whom? Parameters/limits comply with SPECs (or to values specified in processing documents)?	
		Testing in the processing areas     (laboratory)	•	Who prepares and controls quality of reagents and standards used? Who controls the equipment and quality of testing? Personnel (operators) trained? Where is documented?	
8.4.	Testing of intermediates	System	•	What is the testing strategy (extend, methods, parameters and limits used)? Which results are transferred into the final product protocol?	
		Sampling	•	Who takes samples for this testing?	
8.5.	Testing of final products	System	•	In which stages of processing are taken samples for final product testing? What kind of control is performed on final packages?	PIC/S G.1. It.1.4. vi; 1.4 vii; 6.14;
		Sampling	•	What is the sampling plan (which norm is used). How do you ensure the representativity of samples per batch?	6.17;
		Samples handling	•	How you handle the rests of final product samples (e.g. large volume containers)?	

		TESTING – continued				
	Area of	Notes	Crucial questions	Supporting		
	operation / items		« show me»	documents		
8.6.	Stability testing	System	Approach/policy described?     Matrixing/bracketing applied? Performed in     place or contracted? Full testing made? Critical     parameters defined?	CPMP/ICH 2736/99; CPMP/ICH 4104/00;		
		On going	<ul> <li>What is the program (intervals, number of batches/products defined)? Analytical methods are suitable? What is the extend of testing in case of changes? Which measures are taken in case if OOS results were tested?</li> </ul>	CPMP/ICH 420/02;		
		Premises/equipment	Appropriate storage stations available?     Dedicated, validated, labelled?			
			<ul> <li>Thermometers and humidity meters calibrated? Is there continual monitoring of temperature and humidity? How are stored light sensitive materials?</li> </ul>			
			Alarms system exists/described (log book)?			
8.7.	Validation of test methods	Policy	Method validation is part of VMP? General SOP on method validation available? Validation report formally approved? Who approves?	PIC/S G. 4.10;		
		Validation process	<ul> <li>Validation purposes specifies? Validation completed and documented in each protocol for parameters defined in ICH:</li> <li>precision (System and method)</li> </ul>	ICH Guide		
			- intermediate precision			
			- Accuracy, - Specificity			
			<ul> <li>Reproduceability</li> <li>linearity (range),</li> <li>limit of detection,</li> <li>limit of quantitation,</li> <li>robustness (including solution stability and filter compatibility)</li> </ul>			
			<ul> <li>Documented in each SOP or protocol:         <ul> <li>Acceptance criterion for each parameter defined and met,</li> <li>System suitability test procedure has been developed,</li> <li>Acceptance criterion for each system suitability parameter defined and met.</li> </ul> </li> </ul>			
			Raw data stored			
		Validation data	• Is there a SOP on method transfer?			
		Method transfer				

9.	RESULTS AND RELEASE OF TEST RESULTS					
	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents		
9.1.	Handling of test results	Transfer of raw data	How are testing results (raw data) transferred into the summary protocol? Are analytical data reviewed by responsible person? How?	Annex 11 to PIC/S G.		
		<ul> <li>Laboratory Management System (LIMS)</li> </ul>	<ul> <li>Is the system validated? Training of operating personnel was carried out? Is the access authorise and controlled? How? Security of results ensured? What is your change control system?</li> </ul>			
		<ul> <li>Summary of raw data</li> <li>Evaluation of test results</li> </ul>	• Who writes the final protocol? How and where are the raw data archived (see also item 3.1. above)?			
		<ul> <li>Trending Note: For questions see item 2.4. above.</li> </ul>	<ul> <li>Who is responsible for comments and evaluation of the results (QC manager)?</li> </ul>			
9.2.	Failures - Out of Specification (OOS) test results	System/OOS	Is there a SOP for OOS result investigation?			
		Laboratory errors (operator, equipment)	<ul> <li>How is laboratory investigation and formal investigation beyond the lab performed?</li> <li>What is your reporting procedure? QA is</li> </ul>			
		Process/Procedure related errors	involved?			
		Evaluation of OOS results	<ul> <li>What is the procedure on decision related to OOS? Reasons defined?</li> </ul>			
		Test results invalidation	How are invalidated test results? Who can invalidate the testing results?			
		Corrective action	How a corrective action implemented?			
9.3.	Failures- Re- testing and Re- sampling	Corrective action     Company's procedure     (re-testing programme,     criteria for re-sampling <sup>*</sup> )	<ul> <li>How often can a retest be performed? How many times could be testing repeated (testing into compliance)?</li> </ul>	PI 012-1 lt.13		
			<ul> <li>What are criteria for re-sampling (e.g. if the sample was not representative)?</li> </ul>			
9.4.	Release of test results/ analytical reports/ certification	Process release of test results	SOP available?	PIC/S G.		
		Feedback to batch release	<ul> <li>Who's responsible for review, decisions, conclusions and formal release of batch? How much is taken into the consideration the validity of analytical results?</li> </ul>	1.2.Vii; 1,4,; 2.6.i; 5.59- 5.60		
		Preparation of Analytical (summary) Report	<ul> <li>Who prepares and approves Summary Report (QC manager)?</li> </ul>			
		Preparation and release of     Certificate of analysis	<ul> <li>Who approves Certificate of analyses? QA involved?</li> </ul>			

Note: Some more details and specific items related to testing in chemical, physical-chemical and microbiological laboratories to be investigated in addition to above described subjects, are involved in Supplements 1 and 2

# AIDE-MEMOIRE FOR INSPECTIONS OF PHARMACEUTICAL QUALITY CONTROL LABORATORIES

# GMP inspection in chemical and physical-chemical laboratories

	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents
1.1.	Chemical testing	Procedures in place	Up dated? Valid? (see also AIDE Item 3.2.)	PIC/S G.6.156.21
		Reagents preparation	Date of preparation and factors indicated on label comply with relevant method?	Eupharm. 4.2.1.; 4.2.2.
		Volumetric glassware	What is the level of volumetric glassware (e.g. pipettes calibration)?	PIC/S G. 3.41. 6.5; 6.19;
		Volumetric solutions	<ul> <li>How are solutions labelled (indicated date of preparation)? What is the accuracy, stability, storage conditions defined (SOP)?</li> </ul>	Eupharm.
		Indicators for titration	Show me your system for housekeeping of indicators!	Eupharm.
			What is the interval for titration indicators change?	2.2.4.
		Water bath	<ul> <li>Scale of thermometer/calibration level correspond to the parameters specified in relevant methods?</li> </ul>	
1.2.	Physical and physical- chemical testing	Titrations	Performed visual or using instruments? If visual how is personnel trained and tested?	Eupharm. 2.2.3.
		Conductometric and pH     measurements	Under which conditions is sample solution measured? Temperature adjusted? If not how is result calculated?	Eupharm. 2.2.38.
			Temperature controlled/adjusted?	Eupharm. 2.2.6.
		Refractometry	Temperature controlled adjusted?	EuPharm. 2.2.7.
		<ul><li>Relative density testing</li><li>Polarimetry</li></ul>	<ul> <li>Temperature controlled/adjusted?</li> <li>RM used? What is traceability to official standards. How many readings made?</li> </ul>	EuPharm. 2.2.8.;2.2.9.
		Viscosity testing		

	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents
1.3.	Qualification for some laboratory apparatuses	Balances	<ul> <li>Are balances calibrated prior to use by suitable masses</li> <li>Are masses certified? Is certificate available? How often is certification performed?</li> </ul>	PIC/S G. lt.3.41
			• Show me your in-house calibration programme? Is there a SOP? What are the acceptance criteria and how is it linked to the external calibration results?	
			How often balances are calibrated? Are calibration certificates available?	
		pH meters	How and when is calibration performed? (daily, before use)?	Eupharm. 2.2.3.
			Calibration buffers are relevant for pH range measured in laboratory?	
		Conductometer	Which calibration material is used for determination of cell constant?	Eupharm. 2.2.38.
		• Titrator (KF determination only)	• Which material is used for the calibration of the titrator?	
		Reference thermometers	• Are the working thermometers compared with a certified thermometer within relevant range?	
			How often the certified thermometer is sent for calibration? Are records available?	
		<ul><li>Melting point apparatus</li><li>Refractometer</li><li>Polarimeter</li></ul>	How is each instrument calibrated (SOP)?     Which certified materials/device is used?	EuPharm 2.2.14-16; 2.2.6.; 2.2.7.
		Disintegration	Is instrument calibrated?	EuPharm
			Is thermometer for water bath suitable and calibrated?	
		Dissolution	Show me the documentation on physical calibration (shaft wobble, level, spindle speed, vibration, vessel temperature)!	EuPharm
			Which materials are used for chemical calibration of the system (USP calibrator)?	
		UV VIS spectrophotometers	- Absorbance accuracy, $\lambda$ accuracy, resolution, limit of stray light controlled for UV equipment?	Eupharm. 2.225.
		IR spectrophotometers	<ul> <li>Verification of wave number scale has been carried out? λ accuracy, resolution, base line flatness controlled for the instrument?</li> </ul>	Eupharm. 2.224.
		Atomic absorption (AA)	• Performance monitored? Linearity and trends assessed? How (by choosing frequently analysed elements or another element such as cooper)?	Eupharm. 2.2.23.
		HPLC/GC	Is there well defined system suitability tests?     Acceptance criteria have been defined?	EuPharm. 2.2.28.
		Water testing TOC equipment	• Which material is used for calibration (RM)?	

## AIDE-MEMOIRE FOR INSPECTIONS OF PHARMACEUTICAL QUALITY CONTROL LABORATORIES

# GMP inspection in microbiological laboratories

	Area of operation / items		Notes		Crucial questions « show me»	Supporting documents	
1.		PREMISES AND EQUIPMENT					
1.1	Premises	•	Areas / Sterility testing area	•	How is the design and fittings of the area? Where are sterility tests carried out? In isolator? How is assessed protection against microbiological contamination during aseptic operations? Appropriate instructions for access into the critical areas exist?	PI 012-1 lt.8.1.; 8.3.	
		•	Areas for positive control tests and fertility testing	•	Fertility testing performed? Where? Is there area for positive tests/fertility testing separate from areas where product is tested?	PI 012-1 lt.11.6	
		•	Air supply and ventilation system in microbiological laboratory	•	Is the system properly designed? Show me the schematic drawing. Is the ventilation system separated from other areas? What are the pressure differentials (e.g. airlock-test room)? Are there visual alarms?	PI 012-1 lt.8.1.2.	
		•	Area of preparation	•	Where are prepared materials for aseptic operations? Where are prepared culture media for testing? Is there any segregated area/room for manipulation with culture media?		
		•	Washing room	•	How and where are decontaminated materials from microbiological testing? Is there some segregation of washing area to the clean and non clean part?		
1.2.	Equipment	•	Isolators used for the sterility testing	•	IQ, OQ, PQ made? Show me the results (report)! Show me the results of leak test in general (same as LAF)!	Annex to PIC/S G. It. 7-9; PI 014-1	
		•	Incubators	•	Show me the document involving the temperature mapping! Calibration of instrument for measurements of humidity was made? How is tested $CO_2$ (calibration)?		
		•	Autoclave	•	Show us the results of validation (cold points, cycles number, stacking)! How do you maintain autoclave. What is the quality of steam (quality SPECS)? What kinds of control test are performed in the steam?	Annex 1 to PIC/S G. It.36;	
		•	Sterilisation by autoclave	•	What equipment is sterilised? How is equipment sterilised? Raw data available (cycle/ temperature records)? How are goods handled, which have been run a failed cycle (SOP)?	Annex 1 to PIC/S G. It.55-68;	
		•	HEPA Filters (validation/maintenance)	•	What ways do you have to ensure the integrity of filters (HEPA)? What is the frequency of their replacement? How do you ensure there is no leakage after replacement	Annex 1 to PIC/S G. It.29; PI 012-1 It.8.1.2.	

	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents		
		PREMISES AND	EQUIPMENT - continued			
1.2.	Equipment	Colony counter unit	Calibration made? How?			
	continued	Particle counter	Show me the document on qualification!			
		Microscope	Which type used? Was qualified?			
2.	MATERIALS					
2.1	Testing materials	Settle plates	<ul> <li>What media type is used (Bacteria &amp; yeasts moulds suitable)? Have the plates been irradiated (zero results!)? What is exposure time and how is it calculated (dryness!)?</li> </ul>	EuPharm 2.6.		
		Culture media(kind, purpose)	<ul> <li>Is there tested each batch (growth promotion, selectivity, sterility)? Is there an agreement available on shipment (plates) of prepared media? How is shipment validation performed? How do you guarantee that shipment conditions are kept constant</li> </ul>	PI 012-1 lt.11.3.		
		<ul> <li>Culture collection/ Reference. standards</li> </ul>	<ul> <li>How do you store the reagents and strains used for the identification? Show me the inventory! Are identifications of strains carried out on arrival? Expiration indicated on labels?</li> </ul>			
2.2.	Protective garments	Preparation	How are gowns washed / sterilised?			
		Use in performance	<ul> <li>Which protective garments are used by operators at sterility testing? Are they suitable for intended use? Are the laboratory coats located in appropriate manner? Instructions for use exist? Training of operators was made? What standard for micro assays is used?</li> </ul>			
3.		TEST	ING			
3.1.	Microbiological testing (product)	Incubation	<ul> <li>Show us the limits of incubation! What is the incubation time and temperature? What is the frequency of observation of sample during incubation?</li> </ul>	EuPharm.2. 6.1. and Suppl.4.7. It.2.6.1.13.		
		Growth promotion	<ul> <li>Do you have records (registration/incubation)?</li> <li>Which micro-organisms used?</li> </ul>	PI 012-1, 11.311.6. PI 007-1, 5.25.5.;		
		Positive controls	<ul> <li>The procedure for sub-cultures available? Which controls do you have? How often do you perform positive controls and why?</li> </ul>	9.9.19.9.2 Pl 012-1, lt.11.5.		
		Negative controls	<ul> <li>Do you perform negative product controls? Show me SOP (number of containers/samples)!</li> </ul>			
		Bioburden	<ul> <li>Limits defined/used in production/in process controls? Does bioburden IPC'S show the worst case conditions?</li> </ul>			
		Micro-organism – identification	<ul> <li>Which system do you use to identify? If certain system is chosen VITEC- how is validated?</li> </ul>			

	Area of operation / items	Notes	Crucial questions « show me»	Supporting documents
3.2.	Microbiological testing Environmental	System of performance	How is monitoring performed at rest/in operation? What is the frequency? How is testing verification performed? Is the monitoring involved in validation plan? Are there available documents on pre-qualification/re-qualification?	PIC/S G. 1.3. ; Annex 15. lt.43.
		Sampling location	<ul> <li>Location/sampling sites selected? How is worst case determined? Water system/area included? Which mode/method is used (SOP)? How are deviations handled? Validation made?</li> </ul>	PI 012-1, lt.10.3
		<ul><li>Swabs</li><li>Settle plates</li></ul>	<ul> <li>Which types of swabs/solutions are used? Which swabbing techniques are used?</li> <li>Which media used? What is the method, time exposure, surface area/limits and recovery rate? The recovery plate for the surfaces validated: How?</li> </ul>	PI 012-1, lt.10.4-10.5.
		Contact plates	• Vendor verification was made? Preparation/expiry date specified? Sterility test of contact plates performed? Incubation and frequency described (SOP)? Identification of organisms made? What is the time lapse from fumigation to taking sample?	
		Limits for microbiological testing	<ul> <li>Limits defined for raw materials/finished products, water, air quality, equipment within processing and testing areas, for personnel, storage areas, detergents (cleaning validation)? Limits justified? How?</li> <li>What are your action/alert limits? What is the</li> </ul>	
			procedure if the limits overshoot? Note: The particulate matter (with respect to situation "in site") should be controlled in addition.	