

Manual 002 Retention and Disposal of GMP Documents and Retention Samples
Is the corresponding term to reference samples used in the FDA GMP.

3.6 Active Pharmaceutical Ingredient (API)

Any substance or mixture of substances intended to be used in the manufacture of a drug (medicinal) product that when used in the production of a drug becomes an active ingredient of the drug product. Such substances are intended to furnish pharmacological activity or other direct effect in the diagnosis, cure, mitigation, treatment or prevention of disease or to effect the structure and function of the body.

3.7 Intermediate

A material produced during steps of the processing of an API which must undergo further molecular change or purification before it becomes an API.

3.8 Starting Material.

Any material used in the production of an API, intermediate or a formulated product, but excluding packaging material. Starting material can be further defined as follows:

- Excipient – material used in the production of a formulated product (excluding APIs)
- Raw Material – material used in the production of an API or Intermediate. A raw material may be further classified as either a CRM (Contributory Raw Material) or an NCRM (Non contributory raw material) dependant on it's role in the synthesis

3.9 Packaging Material

Any material employed in the packaging of an API, intermediate or formulated product, excluding any packaging material 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.

3.10 Formulated Product

A finished dosage form, for example tablet, capsule, solution, suppository, that contains an API usually, but not necessarily, in association with inactive ingredients. It also includes a finished dosage form used as a placebo.

3.11 Finished Product

A formulated product which has undergone all stages of production including packaging in its final container.

4 Responsibilities

- 4.1** It is the responsibility of each manufacturing site to have procedures in place which comply with this procedure and with local legislative or regulatory requirements where they are different.

5.5 Reference/Reserve Samples

5.5.1 Raw Materials, Excipients, API's, Intermediates, Formulated Products and Finished Products.

The Reference/Reserve sample shall consist of at least twice the quantity necessary for all tests required to determine its compliance with specification, except for sterility and pyrogen testing; where the quantity required to repeat these tests only once shall be retained.

The Reference/Reserve sample shall be retained and stored under conditions consistent with the product labelling and/or specification requirements.

In the case that there are no conditions given on the label and/or in the specification the samples shall be stored in controlled room temperature.

The Reference/Reserve sample shall be stored in the same primary container enclosure system in which the product is marketed or shipped, or in one that has essentially the same characteristics, (i.e. mimics the container-closure system); it is acceptable to use smaller packs.

Reference/reserve samples of APIs shall be retained as described in the Appendix A3.

Reference/reserve samples need not be taken for intermediates. However, intermediate samples are typically taken and retained until stock is consumed and API released.

Reference/reserve samples need not be taken from Raw Materials. However, individual sites may take the decision to keep some materials for investigative purposes. Typically this will be the case for New Product Introduction/Technology Transfer materials or changes in suppliers. Consideration should be given to the criticality of the material in the production process.

Reference/Reserve samples need not to be taken from water, gases or starting materials that are highly corrosive or very inflammable unless stated specifically.

Reference/Reserve samples should be retained in accordance with the retention stated in Appendix A2, if the stability of the product permits.

For product marketed in the USA or starting material used for USA marketed product, as a minimum, representative sample lots or batches of Finished Products shall be selected by acceptable statistical procedures. The samples for Finished Products should be examined visually at least once a year for evidence of deterioration unless visual examination could affect the integrity of the samples. The results of the examination should be documented and maintained with other stability data on the Finished Product.

5.5.2 Packaging Material

Reference/Reserve Samples need only be taken from primary and printed packaging materials. For printed and primary packaging material one unit must be retained, unless retained as Finished Product. Any overprinting such as batch code and/or expiry date must be included. This can be included as a sample retained in the associated packaging documentation.

Manual 002 Retention and Disposal of GMP Documents and Retention Samples documents and samples from damage or loss caused by environmental conditions, accident, fire and flood etc and their salvage in the event of such a disaster.

5.11 Disposal of Documentation and Samples

Documents and samples should be destroyed at the end of their appropriate retention period. Disposal of samples must be in accordance with relevant EHS principles. A record of the disposal should be retained. Documents must be disposed of by shredding or incineration.

In the event of a third party contractor being used to dispose of documents and/or samples, this contractor's activities should have been inspected by site QA personnel in order to determine suitability and to ensure that systems are in place to ensure that confidential information/proprietary material is adequately safeguarded before, during and after disposal.

6. Appendix A : A1 GMP Documentation
 A2 Medical Device Documentation
 A3 Samples

A1 GMP DOCUMENTATION

WHAT	RETENTION PERIOD YRS	COMMENTS
REGULATORY DOCUMENTATION - SMF - DMF - Regulatory Authority inspection reports/documentation	Indefinite	
MANUFACTURING DOCUMENTATION - Raw Mat. Receipts - Dispensing information - Batch Prod. Record - Packaging Prod. Record - In process controls (+ raw data) - Deviation reports/investigations - Hygiene controls - Distribution records - Returns information - Equipment usage + cleaning logs. - Cleaning records - Temperature/humidity records (inc. Transit) - Master batch production records - Master packaging production records APIs	Retest/Expiry life + one year or three years after final distribution whichever is the longer Shelf life + one year or at least five years	Full change history Full change history
FORMULATED PRODUCTS		

A3 SAMPLES

WHAT	RETENTION PERIOD YRS	COMMENTS
RAW MATERIALS	N/A	
INTERMEDIATES	N/A	Typically until stock consumed and API released
APIs	Expiry date + one year or three years after the final distribution	
EXCIPIENTS	10	If stability permits. Exclude water, gases, highly corrosive or inflammable
FORMULATED PRODUCTS - Finished tablets/capsules - Dry powders (unlabelled final containers) - Bulk liquid - Semi solids (eg creams/ointment/suppositories) - Placebos	Expiry date + one year	
FINISHED PRODUCTS - Tablets/capsules - Powders and inhalers - Liquids (sterile and non-sterile) - Semi solids - Parenterals - Medical devices - Aerosols	Expiry date + one year	
PACKAGING MATERIALS - Primary and printed	Expiry date + one year	
CUSTOMER COMPLAINTS	2	3 yrs for medical complaint samples
ROUTINE PRODUCTION STABILITY TESTING	Up to 6	Product dependant