1 Purpose

The purpose of this guideline is to define the content of Batch Specific Documentation (BSD), the process by which BSD is produced and the use to which it is put. BSD in this context refers to the Certificate of Analysis, (CofA) and the Certificate of Manufacture (CofM).

The Standard for Batch Specific Documentation that is described within this guideline can be summarized as:

Standard Certificate Formats:
- Certificate of Manufacturing
- Certificate of Analysis
- Certificate of Analysis under Mutual Recognition Agreement (MRA)

Electronic Signatures for all Batch Specific Documentation

No transcription of analytical results by Packing Site ♯ use Production Site data and CofA directly

Certificates available as Adobe PDF files

2 Scope and Applicability

This Guideline is applicable to all Operations sites issuing CofA and C of M.

For materials distributed to other sister sites or customers for commercial use. BSD used for compliance, importation, financial and regulatory purposes is within the scope of this procedure.

For product received from an external source, the Operations Site concerned should require the same standard of documentation.

3 Definitions

3.1 Certificate of Analysis (C of A)

A batch specific document issued by a manufacturer, vendor or exporter that contains all of the information given on a Certificate of Manufacture (CofM) but in addition also has the analytical results and specification limits for the referenced batch.

3.2 Certificate of Manufacture (C of M)

A batch specific document issued by a manufacturer, vendor or exporter that attests that the batch meets the specifications and has been produced in
4.3 It is the responsibility of each Supply Point Account Manager working in coordination with the Supply Point QA and supply organizations to ensure that the market specific requirements for provision of BSD are discussed and agreed with the receiving customer for a particular market.

In a European context the issue of any BSD presupposes that Annex 16 Chapter 2.1 of EU Directive 2003/94 is fulfilled: Each batch of finished product must be certified by a Qualified Person within the EC/EEA before being released for sale or supply in the EC/EEA or for export.

5 Guideline

The process for agreement, generation and delivery of BSD is shown schematically in Appendix I.

5.1 Document Types

The type of batch specific documentation to be supplied varies depending upon the customer's needs. It can range from no documents through to a CofA signed with a wet-ink signature.

The options for providing BSD to external customers are, in descending order of preference;

i) No documentation.
ii) Certificate of Manufacture.
iii) External Certificate of Analysis.

An Internal CofA is used to support transfer of bulk-finished products between manufacturing sites. A Raw Material CofA is used for API, intermediates and excipients.

The standard language to be used is English.

5.2 Certificates for Registration Samples

The registration and license renewal processes for products may require the company to send samples to the Regulatory Authorities. These samples require BSD to be provided. In all cases CofA should be provided, CofM are not acceptable. However the normal market specific CofA for finished product, including electronic signature is acceptable. In exceptional circumstances it may be necessary to produce a version that is signed manually i.e. wet ink signature.

5.3 Signatures

When BSD is required it must be signed. If it is generated by a validated data management system e.g. LIMS, then an electronic signature is acceptable and there is no requirement to further sign the documents with ink. Only in
Certificate.

GMP statement and conclusion.

Name, title and full signature/date of person responsible for the release of the material. For certificates generated electronically from a validated Laboratory Information Management System the signature should be in the form of an electronic signature assigned as the document is produced. When the original document is generated manually then the signature should be hand written.

Date of release entered as Day, Month, and Year e.g. 1st August 2003. If figures are used e.g. 01/08/2003 there is a danger of confusion between the USA and European conventions on date expression. Clarity is the objective.

If appropriate a statement indicating that the document has been electronically signed.

The Certificate of Manufacture should be in English.

5.7.2 External Certificate of Analysis Type I

(For external supply of Finished Product).

When all of the production activities have taken place at one site it will be possible to produce an External CofA without having to refer to an Internal CofA that has been generated by another site.

The external CofA will contain all of the information held on the Certificate of Manufacture but in addition:

Registered tests as stated under ‘specification tests’ in the relevant Regulatory Documentation (e.g. MAA, NDS, NDA) for the particular market.

Reference to the procedures used e.g. Strength by HPLC.

Acceptance criteria for each test as stated according to MAA/NDS/NDA with corresponding units and reference to pharmacopoeia as appropriate.

This includes the registered text for Description.

Numerical values and/or limits should be written with the corresponding units.

Results should be reported to the number of significant figures stated in the specification with the exception that degradation products should normally be reported to 2 decimal places.

For identification: reference should be made to the ‘Approved test(s)’
A market restriction may apply. Any such restriction will be given on the Internal CofA using either:

- Suitable for use in <INSERT COUNTRY NAME>
- Marketing Authorization excludes supply to market(s) <INSERT COUNTRY NAME>

When a batch of finished product is manufactured it is often not known to which market the product will be directed and this is not known until the batch has been allocated for packing. It can therefore be difficult for a CofA to be generated at the bulk finished product site that is relevant to the final destination market. In the first case the Internal CofA should be produced to fulfill the specification requirements of the country in which the receiving site is based. Subsequently the correct market specific Internal CofA should be requested by the receiving site from the bulk finished product site.

As remote access to BSD becomes available it will be possible for the packaging site to select for themselves the correct market specific CofA.

5.7.5 **External Certificate of Analysis Type II**

(for external supply when Bulk Finished Product has not been made at the Packaging Site)

If a market requires a CofA it is necessary to attach the Internal CofA with a linking document that certifies the final stage of manufacture.

The External CofA sent to the customer is then composed of two documents;

- External CofA Type II that links to the:
  - Internal CofA (for bulk finished product).

The External CofA Type II is identical to the Certificate of Manufacture referred to in 5.8.1 but with fields for the bulk batch number and the packing batch number.

It is the responsibility of the QA/Compliance unit of the final release site to ensure that the product complies with the specification of the final destination country.

5.7.6 **Raw Material Certificate of Analysis**

(for API, Intermediate and Excipient).

This CofA complies with the requirements stated in ICH Q7a and is designed for internal use and for contractors. It is very similar to that used for internal transfer of bulk finished product but with the following differences:

- Intermediates may be named using an agreed trivial name.
- Excipients should be named as stated in the pharmacopoeia.
Appendix 1  Schematic showing production and distribution of batch specific documentation

**Supplying Routine Batch Specific Documentation Detail**

![Schematic diagram of batch specific documentation]

**BSD can be**

1. Certificate of Analysis
2. Certificate of Analysis – MRA
3. Certificate of Manufacture

**BSD record**

- Market BSD requirements
- Market Specific requirements defined by: RA, Q&C procedure, Supply point account, Manager (QA, Supply organisations)

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