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Prequalification Unit Inspection services WHO PUBLIC INSPECTION REPORT

Desk Assessment of Active Pharmaceutical Ingredient (API) Manufacturer

Part 1	General information			
Company information				
Name of	Honour Lab Limited			
Manufacturer				
Corporate	Honour Lab Limited			
address of	H.NO.8-3-166/7/1			
manufacturer	Erragadda, Hyderabad – 500018, Telangana – 502313, India			
	www.honourlab.com			
Inspected site				
Name & address	Honour Lab Limited, Unit III			
of	Plot 4, Hetero Infrastructure Ltd., SEZ, N. Narasapuram Village, Nakkapally,			
manufacturing	Visakhapatnam, Andhra Pradesh, 531081			
site	India			
	Latitude: 17°22' 5 8"N			
	Longitude: 82°43'32"E			
Synthetic	Block A, manufacturing section VII			
Unit/Block/W	, , , , , , , , , , , , , , , , , , , ,			
orkshop				
Manufacturing	26/VP/AP/2013/B/R, valid up to 29.08.2023			
license				
number				
Desk assessment d	letails			
Start and end	21, 28 – 30 August 2020			
dates of review				
API covered by	Remdesivir			
this desk				
assessment				
List of	1. USFDA EIR, dates of inspection 11 – 15 November 2019			
documents	2. FDA Form 483			
submitted	3. CAPAs to Form 483 and response letter			
	4. List of regulatory inspections			
	5. OGYEI (Hungary) inspection report			
	6. CAPAs to OGYEI inspection report			
	7. OGYEI GMP certificate			
	8. Ministry of Industry and Trade of Russian Federation GMP certificate			
	9. Manufacturing license			
	10. Government of Andhra Pradesh Drugs Control Administration GMP certificate			
	11. SMF and layouts			
	12. List of products manufactured at site			
	•			
	 12. List of products manufactured at site 13. PQR Clobazam 14. BMR/BPRs 15. Analytical raw data (intermediate) No XX 16. Analytical raw data (intermediate) No YY 17. Analytical raw data (finished API) No ZZ 			

Honour Lab Limited, Unit III, Visakhapatnam India- Desk Review-API

21, 28 – 30 August 2020

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	18. Declaration: recalls				
	19. Declaration: self-inspection				
	20. Declaration: warning letter				
	21. Master batch record – drying, micro-pulverization, sifting and packaging				
	22. Master batch record – stage I				
	23. Master batch record – stage II				
	24. Master batch record – stage III (finished API)				
	25. Facilities/equipment covered by SRA inspections				
Any documents	26. SOP "Preparation of Annual product quality review" N/A				
missing?	IV/A				
Part 2	Summary of SRA/NRA inspection evidence considered (from most recent to last)				
1 111 2	and comments				
USFDA	Dates of inspection:	11 – 15 November 2019			
	Type of inspection:	Surveillance and preapproval inspection			
	Block/Unit/Workshop:	Block A, B and C			
	APIs covered:	Sacubitril Valsartan Sodium on Colloidal			
		Silicon Dioxide			
		WHO API was not specifically covered			
OGYEI	Dates of inspection:	20 – 27 November 2019			
(Hungary)	Type of inspection:	GMP compliance inspection			
	Block/Unit/Workshop:	Blocks A, B and C			
	APIs covered:	Sitagliptin HCl H2O			
		Vildagliptin			
		Pirfenidone			
		Ticagrelor			
		• Apixaban			
		ApixabanDimethyl Fumarate			
		ApixabanDimethyl FumarateLinagliptin			
		 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) 			
		 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan 			
Part 3	Summary of the last WHO inc	 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered 			
Part 3 Date and	Summary of the last WHO ins	 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered 			
Date and	Summary of the last WHO ins The site has never been inspected	 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered 			
		 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered 			
Date and conclusion of		 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered 			
Date and conclusion of most recent		 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered 			
Date and conclusion of most recent WHO inspection	The site has never been inspected	 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered 			
Date and conclusion of most recent WHO inspection Abbreviations	The site has never been inspected Meaning	 Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered 			
Date and conclusion of most recent WHO inspection Abbreviations BMR	The site has never been inspected Meaning Batch manufacturing record	Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered pection d by the WHO			
Date and conclusion of most recent WHO inspection Abbreviations BMR BPR	Meaning Batch manufacturing record Batch production record Corrective action and preventive Change control	Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered pection d by the WHO			
Date and conclusion of most recent WHO inspection Abbreviations BMR BPR CAPA	Meaning Batch manufacturing record Batch production record Corrective action and preventive	Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered pection d by the WHO			
Date and conclusion of most recent WHO inspection Abbreviations BMR BPR CAPA CC GMP HVAC	Meaning Batch manufacturing record Batch production record Corrective action and preventive Change control Good manufacturing practices Heating ventilation and air-cond	Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered pection d by the WHO action			
Date and conclusion of most recent WHO inspection Abbreviations BMR BPR CAPA CC GMP HVAC SRA	Meaning Batch manufacturing record Batch production record Corrective action and preventive Change control Good manufacturing practices Heating ventilation and air-cond Stringent regulatory agency	Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered pection d by the WHO action			
Date and conclusion of most recent WHO inspection Abbreviations BMR BPR CAPA CC GMP HVAC	Meaning Batch manufacturing record Batch production record Corrective action and preventive Change control Good manufacturing practices Heating ventilation and air-cond	Apixaban Dimethyl Fumarate Linagliptin Posaconazole (Form-I) Macitentan WHO API was not specifically covered pection d by the WHO action			

Honour Lab Limited, Unit III, Visakhapatnam India- Desk Review-API

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PQR	Product quality review
SOP	Standard operating procedure
QMS	Quality management system

David 4	Commence of the assessment of some outing decomments.
Part 4	Summary of the assessment of supporting documentation

a) Manufacturing authorization and GMP certificate granted by the local authority:

License: 26/VP/AP/2013/B/R, valid up to 29.08.2023 Government of Andhra Pradesh Drugs Control Administration GMP certificate No 12747/DD/DCA/VSP/2019, valid up to 31.10.2020.

b) Site master file (SMF):

SMF submitted and reviewed. SMF written according to the WHO TRS No. 961, Annex 14

c) List of all the APIs or other products (intermediates, dosage forms) manufactured on-site:

54 APIs are manufactured at the site:

- Anti diabetics
- Anti coagulants
- Norepinephrine reuptake inhibitor
- Erectile Dysfunction agent
- Anti hypertensive
- Anti psychotic agent
- Anti convulsant
- Anti-retroviral
- Anti-Gout
- Atopic dermatitis
- Iodine X-ray contract agents
- Multiple sclerosis
- Anti diarrheal, gastrointestinal agent
- Anti dyspareunia agent
- Anti fibrotic
- Anti fungal
- Cardiovascular agent
- PAH activator
- Anti viral
- Reversal of Neuromuscular blockade and reversal of nondepolarizing muscle relaxants
- Anti platelet

d) List of all regulatory inspections performed in the last 3 years and their outcomes:

Name of inspected authority	Dates of inspection	Outcome
USFDA, USA	11-15 November 2019	EIR received, inspection closed
	19 – 23 June 2017	EIR received, inspection closed
	17-21 August 2015	EIR received, inspection closed
OGYEI, Hungary	20 – 27 November 2019	GMP certificate issued
Ministry of Industry and Trade	10 – 13 October 2018	GMP certificate issued
of Russian Federation, Russia		
German Authority	5 – 6 July 2016	GMP certificate issued
MFDS, Korea	22 – 25 February 2016	GMP certificate issued
TGA, Australia	26 – 29 April 2016	GMP certificate issued

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e) Most recent product quality review (PQR) of the concerned WHO API:

3 Remdesivir validation batches has been manufactured, therefor PQR for Clobazam was reviewed

Batch manufacturing and packaging records, including the analytical part, for the most recently released batch of relevant API:

Submitted and reviewed Remdesivir:

- BMR/BPR stage I, stage II, stage III and stage HR (finished API)
- Analytical raw data (intermediate) No XX
- Analytical raw data (intermediate) No YY
- Analytical raw data (finished API) No ZZ

g) Master batch manufacturing and packaging records of the API of interest:

Submitted and reviewed Remdesivir:

- Master batch record drying, micro-pulverization, sifting and packaging
- Master batch record stage I
- Master batch record stage II
- Master batch record stage III (finished API)

h) Recalls in the past three years related to APIs with quality defects:

Declaration submitted: no recalls in the past 3 years

Confirmation by the senior quality assurance representative that a full self-inspection or external audit dedicated to the API has been performed and all matters dealt with:

Declaration submitted: a full self-inspection or external audit dedicated to the API has been performed and all matters dealt with

j) Copy of any warning letter, or equivalent regulatory action, issued by any authority for their market, to which the site provides or has applied to provide the API(s):

Declaration submitted: no warning letters or equivalent regulatory action, issued

k) Out-of-stock situations:

Declaration submitted: no out-of-stock situations

Additional documents submitted:

"SOP "Preparation of Annual product quality review"

Part 5 Conclusion – Desk assessment outcome

Based on the GMP evidence received and reviewed, it is considered that a desk assessment is acceptable in lieu of a WHO onsite inspection. The site Honour Lab Limited, Unit III (Block A, manufacturing section VII), located at Plot 4, Hetero Infrastructure Ltd., SEZ, N. Narasapuram Village, Nakkapally, Visakhapatnam, Andhra Pradesh, 531081, India is considered to be operating at an acceptable level of compliance with WHO GMP guidelines for APIs.

This WHOPIR will remain valid for 3 years, provided that the outcome of any inspection conducted during this period is positive.



Part 6

List of guidelines referenced in this inspection report

- 1. WHO good manufacturing practices for active pharmaceutical ingredients. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fourth Report. Geneva, World Health Organization, 2010 (WHO Technical Report Series, No. 957), Annex 2. Short name: WHO GMP for APIs or WHO TRS No. 957, Annex 2 http://apps.who.int/medicinedocs/documents/s20119en/s20119en.pdf
- 2. WHO good manufacturing practices for pharmaceutical products: main principles. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-eighth Report Geneva, World Health Organization, 2014 (WHO Technical Report Series, No. 986), Annex 2. Short name: WHO **TRS No. 986, Annex 2** http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/trs_986/en/
- 3. WHO good manufacturing practices: water for pharmaceutical use. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fourth-sixth Report. Geneva, World Health Organization, 2012 (WHO Technical Report Series, No. 970), Annex 2.

Short name: WHO TRS No. 970, Annex 2

http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/trs_970/en/

4. WHO guidelines for sampling of pharmaceutical products and related materials. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Thirty-ninth Report. Geneva, World Health Organization, 2005 (WHO Technical Report Series, No. 929), Annex 4.

Short name: WHO TRS No. 929, Annex 4

http://whqlibdoc.who.int/trs/WHO TRS 929 eng.pdf?ua=1

- 5. Guidelines on heating, ventilation and air-conditioning systems for non-sterile pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-second Report Geneva, World Health Organization, 2018 (WHO Technical Report Series, No. 1010), Annex 8. Short name: WHO TRS No. 1010, Annex 8
 - http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/trs_1010/en/
- 6. Supplementary guidelines on good manufacturing practices: validation. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fortieth Report. Geneva, World Health Organization, 2006 (WHO Technical Report Series, No. 937), Annex 4.

Short name: WHO TRS No. 937, Annex 4

http://whqlibdoc.who.int/trs/WHO TRS 937 eng.pdf?ua=1

7. WHO Good Practices for Pharmaceutical Quality Control Laboratories. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fourth Report. Geneva, World Health Organization, 2010 (WHO Technical Report Series, No. 957, Annex 1.

Short name: WHO TRS No. 961, 957), Annex 1

http://www.who.int/medicines/publications/44threport/en/



8. WHO Good Practices for Pharmaceutical Products Containing Hazardous Substances. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fourth Report. Geneva, World Health Organization, 2010 (WHO Technical Report Series, No. 957), Annex 2.

Short name: WHO TRS No. 957, Annex 2

http://www.who.int/medicines/publications/44threport/en/

9. WHO good manufacturing practices for sterile pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 6.

Short name: WHO TRS No. 961, Annex 6

http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1

 WHO guidelines on transfer of technology in pharmaceutical manufacturing WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 7.

Short name: WHO TRS No. 961, Annex 7

http://whqlibdoc.who.int/trs/WHO TRS 961 eng.pdf?ua=1

11. Model guidance for the storage and transport of time-and temperature-sensitive pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 9. Short name: WHO TRS No. 961, Annex 9

http://whqlibdoc.who.int/trs/WHO TRS 961 eng.pdf?ua=1

12. General guidelines for the establishment maintenance and distribution of chemical reference substances. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-first Report Geneva, World Health Organization 2007 (WHO Technical Report Series, No.943) Annex 3.

Short name: WHO TRS No. 943, Annex 3

http://whqlibdoc.who.int/trs/WHO TRS 943 eng.pdf?ua=1

13. WHO good practices for pharmaceutical microbiology laboratories. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 2.

Short name: WHO TRS No. 961, Annex 2

http://whqlibdoc.who.int/trs/WHO TRS 961 eng.pdf?ua=1

- 14. WHO guidelines on quality risk management. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-seventh Report Geneva, World Health Organization, 2013 (WHO Technical Report Series, No. 981), Annex 2. Short name: WHO TRS No. 981, Annex 2 http://www.who.int/medicines/areas/quality safety/quality assurance/expert committee/trs 981/en/
- 15. WHO guidelines on variation to a prequalified product. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-seventh Report Geneva, World Health Organization, 2013 (WHO Technical Report Series, No. 981), Annex 3. Short name: WHO TRS No. 981, Annex 3 http://www.who.int/medicines/areas/quality safety/quality assurance/expert committee/trs 981/en/



- 16. WHO guidelines for drafting a site master file. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 14. Short name: WHO TRS No. 961, Annex 14 http://whqlibdoc.who.int/trs/WHO TRS 961 eng.pdf?ua=1
- 17. WHO Guidelines on good manufacturing practices: validation, Appendix 7: non-sterile process validation. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-ninth Report Geneva, World Health Organization, 2015 (WHO Technical Report Series, No. 992), Annex 3. http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/WHO_TRS_992_web.pdf
- 18. WHO General guidance on hold-time studies WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-ninth Report Geneva, World Health Organization, 2015 (WHO Technical Report Series, No. 992), Annex 4. Short name: WHO TRS No. 992, Annex 4 http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/WHO_TRS_992_web.pdf
- 19. WHO Technical supplements to Model Guidance for storage and transport of time and temperature sensitive pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-ninth Report Geneva, World Health Organization, 2015 (WHO Technical Report Series, No. 992), Annex 5. Short name: WHO TRS No. 992, Annex 5
 http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/WHO_TRS_992_web.pdf
- material in the production of antimalarial active pharmaceutical ingredients. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-ninth Report Geneva, World Health Organization, 2015 (WHO Technical Report Series, No. 992), Annex 6

 Short name: WHO TRS No. 992, Annex 6

 http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/WHO_TRS_992
 web.pdf

20. WHO Recommendations for quality requirements when plant – derived artemisin is used as a starting

21. Guidance on good data and record management practices. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fiftieth Report Geneva, World Health Organization, 2016 (WHO Technical Report Series, No. 996), Annex 5.

Short name: WHO GDRMP guidance or WHO TRS No. 996, Annex 5 http://www.who.int/medicines/publications/pharmprep/WHO_TRS_996_annex05.pdf

22. WHO general guidance on variations to multisource pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fiftieth Report. Geneva, World Health Organization, 2016 (WHO Technical Report Series, No. 996), Annex 10.

Short name: WHO Multisource guidance or WHO TRS No. 996, Annex 10 http://www.who.int/medicines/publications/pharmprep/WHO_TRS_996 annex10.pdf



23. Stability testing of active pharmaceutical ingredients and finished pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-second Report Geneva, World Health Organization, 2018 (WHO Technical Report Series, No. 1010), Annex 10.

Short name: WHO TRS No. 1010, Annex 10

http://www.who.int/medicines/publications/pharmprep/WHO TRS 996 annex10.pdf

24. Production of water for injection by means other than distillation. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-fourth Report. Geneva, World Health Organization, 2020 (WHO Technical Report Series, No. 1015), Annex 3.

Short name: WHO TRS No. 1025, Annex 3

https://www.who.int/publications-detail/978-92-4-000182-4

25. Good chromatography practice. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-fourth Report. Geneva, World Health Organization, 2020 (WHO Technical Report Series, No. 1025), Annex 4.

Short name: WHO TRS No. 1025, Annex 4

https://www.who.int/publications-detail/978-92-4-000182-4

26. Points to consider for manufacturers and inspectors: environmental aspects of manufacturing for the prevention of antimicrobial resistance. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-fourth Report. Geneva, World Health Organization, 2020 (WHO Technical Report Series, No. 1025), Annex 6.

Short name: WHO TRS No. 1025, Annex 6

https://www.who.int/publications-detail/978-92-4-000182-4

27. WHO guidance on good practices for desk assessment of compliance with good manufacturing practices, good laboratory practices and good clinical practices for medical products regulatory decisions. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifty-second Report. Geneva, World Health Organization, 2018 (WHO Technical Report Series, No. 1010), Annex 9. Short name: WHO TRS 1010, Annex 9

https://www.who.int/medicines/areas/quality_safety/quality_assurance/TRS1010annex9.pdf?ua=1

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