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Prequalification Team Inspection Services WHO PUBLIC INSPECTION REPORT of the FPP manufacturer

Part 1	General information		
Manufacturers			
Details			
Company			
information			
Name of	PT. SANBE FARMA Sterile Preparations Plant		
manufacturer and	Jl. Industri Cimareme No.8, Desa Cimareme, Kecamatan Ngamprah, Kabupaten		
address	Bandung Barat – 40553, Indonesia.		
	Building A		
	Telephone number +62 22 686 7966		
	Fax number +62 22 686 7969		
	North latitude: - 6,865159		
	East longitude : 107,494871		
Corporate address	PT. SANBE FARMA		
of manufacturer	Jl. Taman Sari No. 10 Bandung 40116 Indonesia		
	Telephone number +62 22420 7725		
	Fax number +62 22423 8476		
Inspected site			
Address of	As above		
inspected			
manufacturing			
site if different			
from that given			
above			
Unit	Unit III		
Block	A		
Manufacturing	Manufacturing license from National Agency for Drug and Food Control (NADFC),		
license number	Republic of Indonesia:		
	License no.: HK.07.IF/V/402/14		
	Date of issue: 26 September 2014		
	Valid until: Permanent		
Inspection details			
Dates of inspection	13-14 February 2017 and 16-17 February 2017		
Type of	Routine		
inspection			
Introduction			
Brief summary of	PT. SANBE FARMA Sterile Preparations Plant, manufactures and controls sterile		
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the manufacturing	products in the following dosage forms: Small and large volume parenterals	
activities	including infusions: liquid injections, dry powders for injection, eye drops, ear	
	drops, eye ointments, and fat emulsions	
	The company produces no highly toxic or hazardous products in Unit III Building	
	A. Oxytocin is the most potent of the materials handled.	
	The site includes a separate and dedicated building for the handling of high potency	
	for the handling of cytotoxic drugs.	
General	PT SANBE FARMA, Unit III, located in Cimareme, Padalarang, Bandung - Indonesia,	
information about	is the facility dedicated to production of non-beta-lactam injectable products within the	
the company and	PT Sanbe Farma group. The factory is situated Jl. Industri Cimareme No.8, Desa	
site	Cimareme, Kecamatan Ngamprah, Kabupaten Bandung Barat - 40553, Indonesia.	
	Building A.	
	The site complex adjoins property operated by a sister company, PT Caprifarmindo.	
	Laboratotries.	
	The PT Sanbe Unit III Building A site was involved in the manufacture of Small	
	Volume Parenterals (SVPs) and Large Volume Parenterals (LVPs – these are mainly	
	in Poly Propylene plastic bags) products. The site houses separate areas for SVPs	
	and LVPs. In the SVP area there were separate facilities for aseptically prepared	
	formulations and aseptic filling into ampoules and vials as well as separate plastic	
	eye drop lines. The company also has extensive facilities in Unit III for LVP	
	terminally sterilized products, dry injection and fat emulation dedicatedly.	
	To the rear of Unit III there were two separate and dedicated buildings. One of these	
	was dedicated to the manufacture of cytotoxic drugs and the other biological	
	products. Each had its own management, facilities and services as well as	
	laboratories.	
	In addition, there was an additional site dedicated to beta-lactam products located 10	
	kilometers from Unit III, for oral solid dosage forms (OSDs) and injectables. This	
	site is located at Unit II, Jalan Mahar Martanegara. No 162 (Jl. Leuwigajah No.	
	162) RT.01, RW.12, Kelurahan Baros, Kecamatan Cimahi Tengah, Kota Cimahi -	
	Indonesia. The inspection of the beta-lactam facility is reported separately.	
Brief report of		
inspection		
activities		
undertaken		
Scope and		
limitations		
Areas inspected	See Part 2 below	
Restrictions	Only Corima ampoule line was inspected	
Out of scope	 LVP terminally sterilized (TS) products. 	
r - r -	 SVP terminally sterilized (TS) products (there was a second ampoule line used 	
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	Contact: prequalinspection@who.int	



for TS ampoules).				
• SVP aseptic powder filling.				
Aseptic eye drop manufacture.				
AHU	air handling unit			
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		\neg		
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HACCP	hazard analysis and critical control points			
HPLC	high-performance liquid chromatograph			
HVAC	heating, ventilation and air conditioning			
ID	identity			
IR	infrared spectrophotometer			
IPC	In process control			
IQ	installation qualification			
KF	Karl Fisher			
LAF	laminar air flow			
LIMS	laboratory information management system			
LoD	limit of detection			
LOD	loss on drying			
MB	microbiology			
MBL				
MF	master formulae			
	 SVP asej Aseptic of RH050 Oxyt RH050 Oxyt AHU ALCOA AQL API APQR BDL BMR BPR CAPA CC CFU CoA CpK DQ EM FAT FBD FG FMEA FPP FTA FTIR GC GMP HACCP HPLC HVAC ID IR IPC IQ KF LAF LIMS LOD MB MBL 	 SVP aseptic powder filling. Aseptic eye drop manufacture. RH050 Oxytocin Solution for injection 10 IU/mL AHU air handling unit ALCOA attributable, legible, contemporaneous, original and accurate AQL Acceptance quality limit API active pharmaceutical ingredient APQR annual product quality review BDL below detection limit BMR batch manufacturing record BPR batch packaging record CAPA corrective actions and preventive actions CC change control CFU colony-forming unit CoA certificate of analysis CpK process capability index DQ design qualification EM environmental monitoring FAT factory acceptance test FBD fluid bed dryer FG finished goods FMEA failure modes and effects analysis FPP finished pharmaceutical product FTR Fourier transform infrared spectrometer GC gas chromatograph GMP good manufacturing practice HACCP hazard analysis and critical control points HPLC high-performance liquid chromatograph HVAC heating, ventilation and air conditioning ID identity IR infrared spectrophotometer IPC In process control IQ installation qualification KK Karl Fisher LAF laminar air flow LIMS laboratory information management system LoD limit of detection LOD lioss on drying MB microbiology laboratory MFL microbiology laboratory 		

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NIRnear-infrared spectroscopyNMRnuclear magnetic resonance spectroscopyNRAnational regulatory agencyOQoperational qualificationPHApreliminary hazard analysisPMpreventive maintenancePpKprocess performance indexPQperformance qualificationPQRproduct quality reviewPQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality misk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTMCtotal microbial countTOCTotal organic carbon	20, avenue Appia – CH-1211 G	ENEVA 27 – SWITZERLAND – TEL CENTRAL +41 22 791 2111 – FAX CENTRAL +41 22 791 3111 – WWW.WHO.INT
NRAnational regulatory agencyOQoperational qualificationPHApreliminary hazard analysisPMpreventive maintenancePpKprocess performance indexPQperformance qualificationPQRproduct quality reviewPQSpharmaceutical quality systemPWpurified waterQAquality controlQCLquality controlQCLquality controlQCLquality isk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTtemperatureTAMCtotal aerobic microbial countTLCthin layer chromatographyTMCtotal microbial count	NIR	near-infrared spectroscopy
OQoperational qualificationPHApreliminary hazard analysisPMpreventive maintenancePpKprocess performance indexPQperformance qualificationPQRproduct quality reviewPQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTtemperatureTAMCtotal aerobic microbial countTICCthin layer chromatographyTMCtotal microbial count	NMR	nuclear magnetic resonance spectroscopy
PHApreliminary hazard analysisPMpreventive maintenancePMpreventive maintenancePpKprocess performance indexPQperformance qualificationPQRproduct quality reviewPQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard dest procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	NRA	national regulatory agency
PMpreventive maintenancePpKprocess performance indexPQperformance qualificationPQRproduct quality reviewPQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	OQ	operational qualification
PpKprocess performance indexPQperformance qualificationPQRproduct quality reviewPQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTLCtitil fungal countTLCtotal microbial count	PHA	preliminary hazard analysis
PQperformance qualificationPQRproduct quality reviewPQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal aerobic microbial countTLCthin layer chromatographyTMCtotal microbial count	PM	preventive maintenance
PQRproduct quality reviewPQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTLCthin layer chromatographyTMCtotal microbial count	РрК	process performance index
PQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	PQ	performance qualification
PQSpharmaceutical quality systemPWpurified waterQAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	PQR	product quality review
QAquality assuranceQCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	PQS	
QCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count		purified water
QCquality controlQCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureTTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	QA	quality assurance
QCLquality control laboratoryQMSQuality management systemQRMquality risk managementRArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTLCthin layer chromatographyTMCtotal microbial count		quality control
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RArisk assessmentRCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	QMS	Quality management system
RCAroot cause analysisRHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	QRM	quality risk management
RHrelative humidityRMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	RA	risk assessment
RMraw materialsRSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	RCA	root cause analysis
RSreference standardSAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	RH	relative humidity
SAPsystem applications products for data processingSFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	RM	raw materials
SFGsemi-finished goodsSOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	RS	reference standard
SOPstandard operating procedureSTPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	SAP	system applications products for data processing
STPstandard test procedureTtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	SFG	semi-finished goods
TtemperatureTAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	SOP	standard operating procedure
TAMCtotal aerobic microbial countTFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	STP	standard test procedure
TFCtotal fungal countTLCthin layer chromatographyTMCtotal microbial count	Т	temperature
TLCthin layer chromatographyTMCtotal microbial count	TAMC	total aerobic microbial count
TMC total microbial count	TFC	
TMC total microbial count	TLC	thin layer chromatography
TOC Total organic carbon	TMC	
	TOC	Total organic carbon
URS user requirements specifications	URS	user requirements specifications
UV ultraviolet-visible spectrophotometer	UV	ultraviolet-visible spectrophotometer
VMP Validation Master Plan	VMP	Validation Master Plan
WFI water for injection	WFI	water for injection
WS working standard	WS	working standard

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Part 2 Brief summary of the findings and comments (where applicable)

Brief summary of the findings and comments

1. Pharmaceutical quality system (PQS)

Principle

Production and control operations were specified in written form and GMP requirements were generally followed. Managerial responsibilities were specified in job-descriptions. Product and processes were monitored and the results taken into account at batch release; regular reviews of the quality of pharmaceutical products were conducted.

Quality Risk Management

The SOP was reviewed. Risk assessment followed the standard approaches described in ICH Q9 met the general requirements of WHO GMP norms and standards:

- Risk identification
- Risk analysis
- Risk evaluation
- Risk control
- Risk acceptance
- Risk communication
- Risk review

Failure modes and effects analysis (FMEA) was used for risk assessment, and the company's main approach to risk assessment was to follow a unified system based upon FMEA. The SOP gave little attention to other risk assessment tools which might be more appropriate under certain circumstances.

In the FMEA approach scores from 1-4 was used for individual elements of the Risk Priority Number (RPN) calculation.

Risk registers were prepared month wise.

RA XX "Risk assessment for YY injection" was discussed. This was generally satisfactory at the high level but did lack sufficient detail and granularity in others.

Product Quality Review (PQR)

The SOP "Product quality review" was reviewed. The PQR schedule for 2016 and 2017 was presented to the inspectors.

A single common PQR was prepared for all Oxytocin (and other) market variant products made according to the same base manufacturing process.

Statistical tools were used for data presentation and analysis. Process capability was calculated using Cpk.

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20, AVENUE APPIA – CH-1211 GENEVA 27 – SWITZERLAND – TEL CENTRAL +41 22 791 2111 – FAX CENTRAL +41 22 791 3111 – WWW.WHO.INT PQR for Santocyn[®] injection (Oxytocin Solution for injection 10 IU/mL) was reviewed:

The PQR was broadly comprehensive and acceptable covering most of the requirements of WHO GMP.

Management review (MR)

The SOP "Management review" was reviewed. According to the SOP quality system review shall be performed quarterly. The SOP was applicable, but not limited to:

- Follow-up action's from previous reviews
- Process performance and product conformity
- CAPAs
- Customer feedback and complaints
- Internal quality audits
- Changes and quality system planning
- Recommendations for improvements
- External assessments such as regulatory inspections and customer audits

Deviations

The SOP "Deviation report" and flow chart were reviewed. The SOP was applicable to unplanned deviations. Deviations and their target close out, were classified with the system based on risk assessment.

Ishikawa diagrams were used for root cause analysis.

Corrective actions and preventive action

The company has a unified CAPA SOP which was used to handle most CAPA arising from several reporting mechanisms. CAPAs related to the self-inspection were presented separately and were linked to the specific self-inspection.

The SOP "Corrective actions and preventive actions" was inspected together with the log and specific examples chosen by the inspectors. CAPAs were proposed by manager or supervisor of each department and the QA manager was responsible for reviewing and approving CAPAs prior to their implementation. CAPAs registers were produced month wise.

Change control (CC)

The SOP "Change management" and its flow chart were reviewed. The SOP was applicable for any GMP related changes.

CC registers were maintained by QA.

2. Good manufacturing practices for pharmaceutical products

Manufacturing processes were defined and reviewed. Qualifications and validations were seen to be performed according to prepared protocols. Significant deviations from the initial protocol were recorded and investigated, root causes were determined and CAPAs were implemented where necessary. Systems were in place for handling complaints and recalling any batch of product from sale or supply.

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3. Sanitation and hygiene

The company had an SOP as the basis for its approach to personal hygiene and sanitation in its production facilities. Microbial monitoring of clean room personnel was performed as part of routine batch control.

Generally, the facilities were noted to be clean and well organized during the inspection.

4. Qualification and validation

Aseptic process validation

The SOP "Aseptic process validation" and "Aseptic process validation protocol /report (Media fill run) VAL-XX and VAL-YY were reviewed.

According to the SOP aseptic process validation should be performed initially for any new or substantially changed process by performing 3 consecutive batches and on-going aseptic process validation should be performed every 6 months normally utilising one batch. For sequential media fills the use of the largest ampoule size and smallest ampoule size were rotated every 6 months.

The most recent media fill was reviewed. The numbers of ampoules were filled with non-sterile Tryptic Soy Broth – TSB media. It was noted that the normal Oxytocin injection filling time was 12 hours. Media simulation was done in 6 phases, totally 18 hours.

According to the SOP section X prior to incubation the containers should be inverted or otherwise manipulated so as to ensure that all surfaces are thoroughly wetted by the growth media. During media fills ampoules were inverted every day and the records of this procedure presented to the inspectors.

The document "Justification to define mimic process of ampoule line products for aseptic process validation (Media fill run)" was discussed. This was generally satisfied and the inspectors were satisfied that the media simulation was sufficiently representative of routine production.

Autoclave validation

The new autoclave adjoining the aseptic ampoule line for garments and spare parts sterilization was installed in October 2015. IQ&OP protocol/reports were available. Autoclave re-qualification protocol VAL-XX and report VAL-YY were discussed. The Bowie Dick test was performed once per day for the garments load.

Depyrogenation oven qualification

Depyrogenation oven IQ&OQ was finished 18 January 2016. IQ&OQ protocol (VAL-XX & VAL-YY) and report were spot checked. Hot air oven qualification report VAL-ZZ was also spot checked.

Clean room qualification

The air to the ampoule filing room was supplied by the AHU XX. Performance qualification report VAL-XX after changes "at rest" was reviewed. The following tests were carried out:

- Air changes per hour/air velocity
- Air flow pattern
- Pressure differentials
- T and RH

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- Facility cleaning verification
- Microbial counts
- Particulate counts
- Particulate removal tests

HVAC system was equipped with alarms, which were said to be routinely challenged.

<u>Temperature mapping</u> The SOP "Temperature and humidity mapping of controlled storage area" was spot checked.

Temperature mapping protocol "Pre-mapping temperature and relative humidity protocol" VAL-XX and report "Pre-mapping temperature and relative humidity protocol" VAL-YY were reviewed. Leak test validation

Oxytocin was filled into 2 mL glass ampoules. Validation of the leak test had been performed in autoclave by vacuum. Validation report VAL-XX "Autoclave X for leak test" was reviewed and discussed.

5. Complaints

The SOP "Product complaint handling" was discussed. Complaints were classified regarding product quality:

- Class I
- Class II
- Class III

and

• Adverse reactions

Complaints register for Unit III 2015 and 2016 was presented to the inspectors. Month-wise registers were used.

Several complaints investigation documents were reviewed.

Complaints were trended yearly.

6. Product recalls

The SOP "Product recall" was discussed. Recalls were classified as per BPOM/NADFC guidelines:

- Grade I recall within 24 hours
- Grade II recall within 5 days
- Grade III recall within 7 days

The QA manager was responsible for dealing with recalls. The head of quality had overall responsibility for dealing with recalls.

Recall effectiveness was periodically evaluated by mock recall. If there was not real recall, mock recall should be performed every 2 years.

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7. Contract production, analysis and other activities

Manufacturing operations and laboratory testing relating to oxytocin were not contracted out. Pest control activities and irradiation of eye drop bottles and components were contracted out.

8. Self-inspection, quality audits and suppliers' audits and approval

The SOP "Audit" was discussed. Inspection was carried out by a nominated self-inspection team.

Inspection was carried out using check lists. Inspection report was written by the team and CAPAs addressed by the inspected department.

Observations were classified as:

- Critical
- Major
- Minor

Check list had the following headings:

- Quality management and personnel
- Standard operations procedures
- Self-inspection
- Premises and equipment
- Warehousing areas
- Dispensary
- Parenteral operations and eye drops
- Sterilization of parenteral and eye drops (Sterilization by filtration)
- Finishing of sterile products
- Quality assurance / quality control department

Suppliers' audits and approval:

The SOP "Vendor approval of new supplier for raw material" was discussed. There was only one supplier of Oxytocin API.

9. Personnel

There appeared to be an adequate number of personnel qualified to perform and supervise the manufacturing and quality control. Controls were in place to prevent unauthorized people from entering production, storage and QC areas.

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LVP	419
Production	163
Packaging	256
SVP	206
Production	99
Packaging	107
Quality Assurance	17
IPC	35
Quality Control	97
Validation	20
DCC	3
PPIC	76
Engineering	66
IT	22
Personnel and GA	41
Others	44
Cost Accounting	6
Security	20
Driver	18
Total	1046

Number of employees:

The SOP "Personnel qualification for manual visual inspection" was reviewed. Oxytocin ampoules visual inspection was performed manually. Operators were re-qualified once a year.

10. Training

Training was provided in accordance with a written training programme.

The SOP "Training" was reviewed. There were the following training modes in place:

- General orientation
- On the job training
- SOP training
- Outside training and seminars

Training effectiveness was evaluated by verbal questions, open questions and written answers.

The SOP "Personnel hygiene application and aseptic technique in sterile products manufacturing" was discussed. The SOP "Personnel qualification working in aseptic area" was also discussed.

Personal files for Mr. XX, a filling operator and Mr. YY, from maintenance engineering in Sterile Preparation Plant were spot checked.

The SOP "Preparation of specimen for qualification manual visual inspection" was spot checked. WHO public inspection report PT. SANBE FARMA sterile February 2017



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11. Personal hygiene

All personnel, prior to and during employment, had to undergo an initial health examination. Thereafter regular health examinations were carried out every year. Personnel conducting visual inspections had to undergo periodic eye examinations every six months. Direct contact between the operator's hands and starting materials, primary packaging materials and intermediate or bulk products was avoided. Smoking, eating, drinking, chewing, and keeping plants, food, drink; smoking material and personal medicines was prohibited in production, laboratory and storage areas.

12. Premises

Ancillary areas

Rest and refreshment rooms were separate from manufacturing and control areas.

Production areas

Exposed surfaces were smooth, impervious and unbroken. Changing rooms were designed as airlocks and used to provide physical separation of the different stages of changing. Changing rooms were flushed with filtered air. Premises were cleaned and disinfected according to written procedures.

Quality control areas

Sufficient space was given to avoid mix ups and cross-contamination. Storage space was provided for samples, reference standards, solvents, reagents and records.

13. Equipment

Fixed pipework was labelled to indicate the contents and the direction of flow. Balances and other measuring equipment of an appropriate range and precision were available for production and control operations and were calibrated on a scheduled basis.

14. Materials

Materials were received, sampled and tested according to the written procedures.

15. Documentation

Documents were available and included SOPs, protocols and records. SOPs reviewed in the production areas were generally being followed and staff appeared appropriately knowledgeable as to their content.

16. Good practices in production

In general production operations followed defined procedures. Deviations from procedures were recorded and investigated. Access to production premises was restricted to authorized personnel.

Oxytocin injection was manufactured on a XX ampoule line. This was the only line used by the company for aseptic filing of aseptically manufactured ampoules. The company had two other lines for terminally sterilized ampoules; however these were not within the scope of inspection.

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Since the previous inspection, the company had installed a Fedegari hot air oven between the grade C and grade B filling room. This was now in routine use for the sterilisation and depyrogenisation of ampoules for aseptic filing and represented significant improvement to the aseptic process over the situation that was seen previously.

The aseptic ampoule filling line was used to fill approximately 20 different products. Oxytocin was the most potent of those products. The solution transfer line hoses and silicone tubing between the filling needles, filing pumps and balancing tank on the machine were stated to be dedicated to a specific active ingredient and were re-used. Other parts of the filling machine were made from stainless steel and was multipurpose use e.g. filing pumps. Cleaning had been validated on a matrix basis.

Secondary packaging rooms were spacious and lines well segregated.

The SOP "Visual inspection manually for sterile product" was spot checked.

17. Good practices in quality control

General

The QC function was independent from other departments. Adequate resources were available to ensure that all the QC arrangements were carried out in a timely and ordered fashion. QC personnel had access to production areas for sampling and investigations as appropriate.

All test equipments (HPLCs, GCs, IRs and UVs) were standalone instruments.

HPLC No X was routinely used for Oxytocin analysis and was checked during the inspection.

The SOP "Audit trail in HPLC which use LC solution system" was spot checked. There were three access levels specified.

The SOP "Preparing and reviewing QC analytical report" was discussed.

The SOP "Sampling for analysis of starting material" was spot checked. According to the SOP starting materials samples were taken from every container and 100 % identity tests were performed.

The SOP "Packaging material sampling" was spot checked. AQL, inspection level II, was used for ampoule sampling. Defects were classified.

Stability testing

18 months stability data was available, but not reviewed by inspectors. One batch per year was placed for on-going stability studies.

Out of specification results (OOS)

The SOP (corporate) was applicable for all investigation of OOS results of raw materials and excipients, packaging materials, APIs and finished products obtained in QC laboratory as well as in stability studies.

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This procedure was also applicable for microbiological OOS tests and sterility failure. It did not cover IPC activities in production.

There were different OOS registers for the chemical and microbiological labs. Registers were maintained on a month-wise basis.

Environmental monitoring of clean area (EM)

The SOP "Environmental monitoring in aseptic room using microbiological method" was discussed. Swab samples, air samples and settle plates were used for EM. Alert and action limits for the results of particulates and microbiological monitoring were defined and monthly trends of environmental monitoring were in place.

The "Environmental monitoring report of SVP filling room, December 2016" was reviewed and discussed.

Monitoring of PW and WFI

The SOP "Water quality routine monitoring" was spot checked. Alert limits were established 60 % from the specification. Sampling plan for drinking water, PW and WFI were in place. WFI critical sampling points at the return loop and storage tanks (SVP and LVP) were sampled and tested daily for endotoxins, conductivity and TOC.

Monthly and half yearly trends were performed and available for inspection. PW and WFI trends July – December 2016 were discussed.

Reference materials

The SOP "Reference standard and working standard" was spot checked.

Pharmacopoeia reference standard was used for Oxytocin impurity tests and a working standard for the assay test.

Working standards were prepared and dispensed by the R&D department in 12 amber glass vials. After opening each vial was required to be used within one month. Usage of reference materials were recorded in a log book.

Oxytocin reference materials were stored in the refrigerator at 2 - 8 °C. T in the refrigerator was continuously recorded on charts. Charts were reviewed once per week. Temperature was controlled manually three times per day.

Stability studies

The SOP "Stability testing" was spot checked. Stability chambers Temperature and RH sensors were connected to the software and recorded continuously. Temperatures were checked manually three times per day. The chambers were equipped with a local sound alarm.

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Retention samples

Finished product and APIs retention samples were stored in refrigerator at 2 - 8 °C. T in the refrigerator was continuously recorded. T in the refrigerator was continuously recorded on charts. Charts were reviewed once per week. T was controlled manually three times per day.

Storage period for finished product was expiry date + 1 year and for APIs was 2 years after finished product release.

Microbiology laboratory

Laboratory premises had separate rooms for positive controls, sterility tests, bioburden tests, media preparation and sterilization.

PART 3

Conclusion

Based on the areas inspected, the people met and the documents reviewed, and considering the findings of the inspection, including the observations listed in the Inspection Report, PT. SANBE FARMA Sterile Preparation Plant (Unit III, Building A, Corima ampoule line) located at Jl. Industri Cimareme No.8, Desa Cimareme, Kecamatan Ngamprah, Kabupaten Bandung Barat – 40553, Indonesia was considered to be operating at an acceptable level of compliance with WHO good manufacturing practices for pharmaceutical products.

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

PART 4

List of GMP guidelines used for assessing compliance

- WHO good manufacturing practices for pharmaceutical products: main principles. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-eight Report Geneva, World Health Organization, 2014 (WHO Technical Report Series, No. 986), Annex 2. http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/trs_986/en/short name: WHO TRS No. 986, Annex 2
- 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* <u>http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1</u>
- 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 TRS No. 957, Annex 2 http://www.who.int/medicines/publications/44threport/en/

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- WHO Good Manufacturing Practices: water for pharmaceutical use. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fourth-six 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/
- 5. 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* <u>http://whqlibdoc.who.int/trs/WHO_TRS_929_eng.pdf?ua=1</u>
- WHO guidelines on good manufacturing practices for heating, ventilation and air-conditioning systems for non-sterile pharmaceutical dosage forms. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Forty-Fifth Report Geneva, World Health Organization, 2011 (WHO Technical Report Series, No. 961), Annex 5 *Short name: WHO TRS No. 961, Annex 5* <u>http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1</u>
- 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* <u>http://whqlibdoc.who.int/trs/WHO_TRS_937_eng.pdf?ua=1</u>
- WHO Good Practices for Pharmaceutical 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. 957, Annex 1* <u>http://www.who.int/medicines/publications/44threport/en/</u>
- 9. 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* <u>http://www.who.int/medicines/publications/44threport/en/</u>
- 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* <u>http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1</u>

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- 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 <u>http://whqlibdoc.who.int/trs/WHO TRS 961 eng.pdf?ua=1</u>
- 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* <u>http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/trs_981/en/</u>
- 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* <u>http://whqlibdoc.who.int/trs/WHO_TRS_961_eng.pdf?ua=1</u>
- 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 *Short name: WHO TRS No. 992, Annex 3* <u>http://www.who.int/medicines/areas/quality_safety/quality_assurance/expert_committee/WHO_TRS_99</u> 2_web.pdf

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 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_99 2 web.pdf

 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_99 2_web.pdf

- 20. WHO Recommendations for quality requirements when plant derived artemisin is used as a starting material in the prosecution 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_99 2_web.pdf
- 21. WHO good manufacturing practices for biological products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifties Report Geneva, World Health Organization, 2016 (WHO Technical Report Series, No. 996), Annex 3
 Short name: WHO TRS No. 996, Annex 3
 http://www.who.int/medicines/publications/pharmprep/WHO_TRS_996_annex03.pdf
- 22. Guidance on good data and record management practices. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifties Report Geneva, World Health Organization, 2016 (WHO Technical Report Series, No. 996), Annex 5 Short name: WHO TRS No. 996, Annex 5 <u>http://www.who.int/medicines/publications/pharmprep/WHO_TRS_996_annex05.pdf</u>
- 23. WHO general guidance on variations to multisource pharmaceutical products. WHO Expert Committee on Specifications for Pharmaceutical Preparations. Fifties Report Geneva, World Health Organization, 2016 (WHO Technical Report Series, No. 996), Annex 10 Short name: WHO TRS No. 996, Annex 10 <u>http://www.who.int/medicines/publications/pharmprep/WHO_TRS_996_annex10.pdf</u>

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