STANDARD OPERATING PROCEDURES

REVIEW & AUDITING THE PIVOTAL BATCH

1. PURPOSE

The purpose of this Standard Operating Procedure is to provide a procedure for the review and auditing of the pivotal batch

2. RESPONSIBILITY

① Symbol indicates work is accepted by Project Manager / Leader /Supervisor.
⑦ Symbol indicates approval and acceptance of the test data, by Quality Assurance.
⑧ Symbol indicates work is accepted by Development Project Manager.

3. FREQUENCY

Following the manufacture of each pivotal batch

4. PROCEDURE

Review the Pivotal Batch documentation under the following headings.
[4.1]. Active ingredients specifications from 'approved suppliers'
[4.2]. Final product formulation.
[4.3]. Final processing instructions.
[4.4]. Final in-process specifications.
[4.5]. Final release specifications.
[4.6]. Final stability specifications.
[4.7]. Final F P specifications.
[4.8]. Final filling specifications.
[4.9]. Final packaging specifications.
[4.10]. Full analytical S.I. methodology and validation.
[4.11]. Full microbiological methodology and validation.
[4.12]. Full cleaning procedure and cleaning validation.

5. DOCUMENTATION

Pivotal batch analytical documentation
Pivotal batch production documentation

[End of Document]

STANDARD OPERATING PROCEDURES

REVIEW & AUDITING THE PIVOTAL BATCH

1. The product formula for the pivotal is the final marketing formula?	❑Yes ❑No
2. The Manufacturing Instructions are suitable for routine production?	❑Yes ❑No
3. The pivotal batch manufacturing equipment is standard production equipment operated by production staff with routine QA personnel?	❑Yes ❑No
4. A side-by-side comparison of the pivotal equipment and the validation batch equipment are similar, and differ in a change in scale only?	❑Yes ❑No
5. The pivotal batch production will follow all production SOPs?	❑Yes ❑No
6. The pivotal batch size is 10 % or greater of the *largest* proposed commercial lot?	❑Yes ❑No
7. The complete pivotal batch must be 100 % filled and packaged in the marketing container-closures (no part-packaging permitted)?	❑Yes ❑No
8. All production equipment has been physically checked for appropriate recorders and control units as written in the pivotal documentation ?	❑Yes ❑No
9. The validation protocol for the *first three* full scale lots is drawn up?	❑Yes ❑No
10. The validation protocol addresses all key *processing parameters*, that if changed, will significantly impact on product quality ?	❑Yes ❑No
11. All microbiological methodology has been audited and signed-off ?	❑Yes ❑No
12. Assays and test methods *based* on the USP, *with* in-house modifications has been validated?	❑Yes ❑No
13. The active's assay has been validated and is a stability indicating test?	❑Yes ❑No
14. The stability protocol addresses the key stability indicating specifications ?	❑Yes ❑No
15. The overall pivotal manufacturing file is audited and signed-off ?	❑Yes ❑No

Note: Revised FDA COMPLIANCE POLICY GUIDE NUMBER 7157.02 (1996).
The FDA has been sensitive to the need for industry to *protect* information generated by internal in-house GMP auditing programs. It is the agencies intention not to review the internal audit results, except under circumstances of litigation or a judicial search warrant. A firm requires to have a written quality assurance program in place at the regulated site in order for the FDA not to review or copy the firm's records and reports that resulted from audits of a written quality assurance in-house program.

A written 'Certificate of Audit' notifying management that such audits and inspections have been implemented, performed and documented and that all corrective action necessary has been taken is required. The intent of the FDA policy is to encourage firms to conduct in-house quality assurance program audits and self-inspections that are both candid and meaningful.

ED. N0: NEW	Effective Date:	APPROVED: http://www.iagim.org			
Ed. Status : ORIGINAL	DD / MM / 200Y	Laboratory	QC	QA	HEAD