



PDA Training Container Closure Systems

Setting of Specifications/ Submission Documentation





Content



- Regulatory specification
- Technical drawing
- Regulatory drawing
- DMF for US submission



Content of a specification for a packaging component (Bilateral agreement between supplier and customer)

- Material specification detailed description incl. material type
- All properties/ parameters tested with the respective testing standard
- DEL (standard or customized)
- Sampling plan (if not DEL)
- Compliance with regulatory standards incl. pharmacopoeias
- Compliance with technical standards (ISO, EN etc.)
- Requirements for change management
- Shipping instructions



Content of testing standard of packaging components

- Chemical identity testing of materials, e.g.
 - IR-spectroscopy of polymers
 - thermal analysis of polymers
 - hydrolytic resistance of glass
- Specific properties (e.g. light protection)
- Functional tests
- Dimensional testing



Defect Evaluation List

- Standardized sampling and testing of packaging components (incl. description of test methods)
- Standardized classification of known defects
- Jointly developed and agreed between packaging suppliers and users of the packaging components (e.g pharmaceutical industry)
- Widely used in Europe for quality assurance of packaging components
- Sampling for quality control testing
 - randomized according to pre-defined sampling tables
 - DIN/ISO 2859 or
 - as an agreement between supplier and customer



Defect Evaluation List

Sampling for quality control testing

- at the supplier as final quality control
- at the customer for release testing

alternatively

- sampling at the supplier and shipment of the samples to the customer (tailgate sample)
- take over of quality testing results of the supplier by the customer after supplier qualification



Defect Evaluation List - Sample table qualitative testing

| Batch size N | Test samples n | <u>n/N (%)</u> |
|-----------------|----------------|----------------|
| ≤ 500 | N oder 80 | 16 - 100 |
| 501 - 1200 | 80 | 6,7 - 16 |
| 1201 - 3200 | 125 | 3,9 - 10,4 |
| 3201 - 10000 | 200 | 2 - 6,2 |
| 10001 - 35000 | 315 | 0,09 - 3,1 |
| 35001 - 150000 | 500 | 0,3 - 1,4 |
| 150001 - 500000 | 800 | 0,2 - 0,5 |
| > 500000 | 1250 | < 0.25 |



Defect Evaluation List - Sample table quantitative testing

| Batch size N | Test samples n | n/N (%) | |
|----------------|----------------|-------------|--|
| ≤ 500 | N oder 13 | 2,6 - 100 | |
| 501 - 1200 | 20 | 1,7 - 4 | |
| 1201 - 10000 | 32 | 0,3 - 2,7 | |
| 10001 - 35000 | 50 | 0,14 - 0,5 | |
| 35001 - 500000 | 80 | 0,02 - 0,23 | |
| > 500000 | 125 | < 0.025 | |

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Defect Evaluation List - Predefined defect classes

- Defect class 1 (critical defects)
 - Packaging material not usable (e.g. wrong printing, deformation, breakage)
- Defect class 2a and 2b (Major defects)
 - Usability of packaging material markedly (2a) or moderately (2b) impaired (e.g. out of tolerance specification with major or moderate impact on manufacturing process)
- Defect class 3 (Minor defects)
 - Usability of packaging material slightly impaired (e.g. cosmetic defects)



Defect Evaluation List - Defect evaluation

AQL = Acceptable Quality Level

- The agreed AQL is the quality level at which a delivery or a batch will be accepted with high probability in accordance with sampling instructions
- It provides the supplier and the customer with valuable indications of the quality of the corresponding product and is also useful for quality management
- The AQL value is part of the random sampling tables
- ♥ The more critical a defect the lower is the AQL



Defect Evaluation List - Sample plan and AQL values of qualitative testing

| Batch size n | ň | AQL | | | | | | | | |
|---|--|---|--|---|----------------------------------|-----------------------------------|-------------------------------|-------------------------------------|--------------------------------------|--|
| | 0.1 | 0.25 | 0.4 | 0.65 | 1.0 | 1,5 | 2,5 | 4.0 | 6.5 | |
| up to 500 501 - 1 200 1 201 - 3 200 3 201 - 10 000 10 001 - 35 000 35 001 - 150 000 150 001 - 500 000 over 500 000 | N or 80 80 125 200 315 500 800 1250 | $ \begin{array}{c} 0 \\ 0 \\ 1 \\ 1 \\ 2 \\ 3 \end{array} $ | $ \begin{array}{c} 1 \\ 1 \\ 1 \\ 2 \\ 3 \\ 4 \\ 6 \end{array} $ | $ \begin{array}{c} 1 \\ 1 \\ 2 \\ 2 \\ 3 \\ 5 \\ 6 \\ 10 \\ \end{array} $ | 1 2 3 4 6 9 13 | 2 2 4 6 9 13 18 | 3 4 6 12 17 26 | 4 6 8 12 18 27 40 | 6 8 12 18 27 41 61 | 9 9 12 18 27 44 63 96 |

Fig. 15.1: Random sample basic table for qualitative tests (acceptance probability 95 %).



Barrel of pre-fillable plastic syringe – practical example





Regulatory specifications

Barrel of pre-fillable plastic syringe – practical example

- Material description
 - Plastic barrel: Cycloolefin polymer (COP)
 - Sealing element: COP outer cover with thermoplastic elastomer (TPE) sealing element
- Material conformity
 - The COP plastic barrel with TPE tip seal complies with the following guidelines or regulations:
 - Ph.Eur. 3.2.2 Plastic containers and closures for pharmaceutical use
 - USP-NF <661> Containers Plastics
 - JP General Tests, Processes and Apparatus 7.02 Test Methods for Plastic Containers
 - EMEA/410/01 <Note for guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal>
 - Commission Directive 94/62/EC <Heavy metals in packaging materials>



Regulatory specifications

Barrel of pre-fillable plastic syringe – practical example

Test Specification

| Test | Acceptance criterion | Method |
|--------------------------|--|-----------------|
| Appearance - barrel | colorless, transparent | visual |
| Identity (IR) - tip seal | has to comply with reference spectrum | IR-spectroscopy |
| Identity (IR) - barrel | has to comply with reference spectrum | IR-spectroscopy |



Barrel of pre-fillable plastic syringe – practical example

Test Procedure

- Appearance barrel Conduct a visual inspection of the packaging component for e.g. its appearance and for obvious defects.
- Identity (IR) tip seal Conduct the test procedure as per instructions and stipulations of Ph.Eur. 2.2.24 for example recording by attenuated total reflection.
- Identity (IR) barrel Conduct the test procedure as per instructions and stipulations of Ph.Eur. 2.2.24 (recording by attenuated total reflection) or

prepare a foil of the material (recommended conditions: 3.5 t at 240 °C for 1 min) and measure the IR-spectrum according to Ph.Eur. 2.2.24.



Regulatory specifications

Plunger of pre-fillable plastic syringe - practical example

- Material description
 - Plunger: Bromobutyl gray cross-linked silicone coated
- Material conformity
 - The plunger complies with the following guidelines or regulations:
 - Ph.Eur. 3.2.9 Rubber closures for aqueous parenteral preparations, for powders and for freeze-dried powders
 - USP-NF <381> Elastomeric closures for injections
 - JP General Tests, Processes and Apparatus 7.03 Test for Rubber Closures for Aqueous Infusions
 - EMEA/410/01 <Note for guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal>
 - Commission Directive 94/62/EC <Heavy metals in packaging materials>



Regulatory specifications

Plunger of pre-fillable plastic syringe – practical example

Test Specification

| Test | Acceptance criterion | Method |
|---------------|---------------------------------------|-----------------|
| Appearance | gray | visual |
| Identity (IR) | has to comply with reference spectrum | IR-spectroscopy |
| Total ash | 44.0 - 48.0 % | gravimetric |



Plunger of pre-fillable plastic syringe – practical example

Test Procedure

• Appearance

Conduct a visual inspection of the packaging component for e.g. its appearance and for obvious defects.

• Identity (IR)

Conduct the test procedure as per instructions and stipulations of Ph.Eur. 3.2.9 and 2.2.24 for example recording by attenuated total reflection.

• Total ash

Conduct the test procedure as per instructions and stipulations of Ph.Eur. 3.2.9 and 2.4.16.



Detailed technical drawing with all critical dimensions incl. acceptable tolerances contributing to the suitability of a final packaging system





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For regulatory purpose the grade of detail of the technical drawing is reduced, otherwise even slight dimensional changes require a full change management





Regulatory drawing

| Components | Dimensions |
|-----------------|-------------|
| 1. Screw cap | 26 x 17 mm |
| 2. Tip cap | 15 x 10 mm |
| 3. PC cap | 36 x 43 mm |
| 4. Luer lid | 25 x 35 mm |
| 5. Gasket | 7 x 37 mm |
| 6. Plunger | 17 x 33 mm |
| 7. Glass barrel | 181 x 36 mm |
| 8. Flange | Ø 53 mm |



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Regulatory drawing

Regulatory Drawing

Submission ("contract" with authorities)

Technical Drawing

Quality Assurance Agreement (contract with supplier)





Drug Master Files (21 CFR 314.420)

A Drug Master File (DMF)

- is a submission to the Food and Drug Administration (FDA) that may be used to provide confidential detailed information about facilities, processes, or articles used in the manufacturing, processing, packaging, and storing of one or more human drugs
- the submission of a DMF is not required by law or FDA regulation
- a DMF is NOT a substitute for an IND, NDA, ANDA, or Export Application. It is not approved or disapproved. Technical contents of a DMF are reviewed only in connection with the review of a drug submission.



Drug Master Files (21 CFR 314.420)

Type I

- Manufacturing Site, Facilities, Operating Procedures, and Personnel Type II
- Drug Substance, Drug Substance Intermediate, and Material Used in Their Preparation, or Drug Product

Type III

• Packaging Material

Type IV

- Excipient, Colorant, Flavor, Essence, or Material Used in Their Preparation
 Type V
- FDA Accepted Reference Information



DMF for US submission

Drug Master Files (21 CFR 314.420)

Each packaging material should be identified by

- the intended use
- components
- composition
- controls for its release
- the names of the suppliers or fabricators of the components used in preparing the packaging material
- the acceptance specifications
- data supporting the acceptability of the packaging material for ist intended use
- toxicological data on the materials





Thank you very much for your attention!!