



Glass Handling Best Practices for Glass Primary Containers

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Dr. Karl Siemoneit Third Party Management Sanofi Insulin Campus Frankfurt









• Course Overview

- 1 Requirements for incoming inspection (Pharmacopoeia requirements)
- 2 How to do it in practice
- 3 What to consider or to avoid (case studies)
- 4 Coordination process between packaging manufacturer and customer



General Remarks

- Packaging is an integral part of a pharmaceutical product
- It affects quality, stability and identification of drug product
- Provides an adequate degree of protection (air, humidity, light)
- Should not interact physically or chemically with drug product
- No risk of toxicity







- Quality requirements for primary glass container for drug product filling are continously increasing
- Fast running filling lines require smooth supply of packaging components
- Supply of material from different suppliers may result in certain variations within agreed tolerances, which may require re-adjustments of filling lines
- Special requirements for
 - Pen-Systems or Auto-Injectors
 - New products (Biologicals) or special applications





• Overview

- **1** Requirements for incoming inspection
- 2 How to do it in practice
- 3 What to consider or to avoid (examples)
- 4 Coordination process between packaging manufacturer and customer







- Legal Requirements
- Acceptance Criteria & Test Parameter
- Test Methods
- Documentation
- Defect Evaluation Lists / Technical Report







Pharmaceutical Quality System

Arrangements are made for the <u>manufacture, supply and use</u> of the <u>correct</u> starting and <u>packaging materials</u>, the selection and monitoring of suppliers and for verifying that each delivery is from the <u>approved supply chain</u>





 EudraLex - Volume 4 - Good Manufacturing Practice (GMP) guidelines



ANNEX 8 SAMPLING OF STARTING AND PACKAGING MATERIALS

Principle

<u>Sampling</u> is an important operation in which only a small fraction of a batch is taken. Valid conclusions on the whole cannot be based on tests which have been carried out on non-representative samples. Correct sampling is thus an essential part of a system of Quality Assurance.

Packaging material

5. The sampling plan for packaging materials should take account of at least the following: the <u>quantity received</u>, the <u>quality required</u>, the <u>nature of the material</u> (e.g. primary packaging materials and/or printed packaging materials), the production methods, and what is known of the **Quality Assurance system** of the **packaging materials manufacturer** based on audits. The number of samples taken should be <u>determined statistically</u> and specified in a sampling plan.



Code of Federal Regulations 21 CFR 211
 Sec. 211.80 General requirements



- (a) There shall be written procedures describing in sufficient detail the <u>receipt, identification, storage, handling, sampling, testing, and approval</u> or rejection of components and **drug product containers** and closures; such written procedures shall be followed.
- (d) Each container or grouping of containers for components or <u>drug</u> <u>product containers</u>, or closures shall be identified with a <u>distinctive code</u> for each lot in each shipment received. This code shall be used in recording the <u>disposition</u> of each lot. Each lot shall be appropriately identified as to its status (i.e., quarantined, approved, or rejected).



• Code of Federal Regulations 21 CFR 211

Sec. 211.84 Testing and approval or rejection of components, drug product containers, and closures



- (5) Sample containers shall be identified so that the following information can be determined:
 - name of the material sampled,
 - the lot number,
 - the container from which the sample was taken,
 - the date on which the sample was taken, and
 - name of the person who collected the sample.

...Containers and closures shall be tested for conformity with all appropriate written specifications. ..



- Specifications / Acceptance Criteria
 - What are acceptance criteria?
 - Who specifies these criteria?
- Test Parameter
 - Definition of test parameter
- Test Methods
 - Identification of methods based on test parameter





Nobody knows it better than you!



ACCEPTANCE CRITERIA

- ... based on the intended use of the glass container
 - Dosage form?
 - Which markets? EU US JP other
 - Kind of application? Oral, Parenteral, Inhalation
 - Legal regulations & laws? AMG, Ph.Eur., USP, JP, CHP, cGMP



TEST PARAMETER

... can be defined based on Acceptance Criteria

Physical / Chemical	Pharmacopeia Regulations Standards
 Microbiological 	Pharmacopeia Internal conditions
 Dimensional 	Technical drawings Engineering standards Product & process requirements
 Visual - Inspection by attributes 	Product & process requirements PDA Technical Report 43 Defect Evaluation List



TEST PARAMETER

- Requirements from pharmacopeias, regulations and defect evaluation lists are important and can be used in general
- Specific requirements may need to be defined individually and mutually agreed with the supplier!
- Supplier data may complement or replace incoming test parameter (risk-based approach)





• Example of an individual defect categorization



A joint risk assessment of packaging components with manufacturing can also increase the acceptance of incoming inspection activities!





¢	Category /	AQL-Level	EXAMPLES / BEISPIELE				
Description			Comment /	Defect sample /	Sample according to specification /		
Fehlerbeschreibung	Kategorie		Bemerkung	Schlechtmuster	Gutmuster		
Form burrs and scars > 1 mm ² on the outer surface of the glass barrel; closure integrity not impaired	cosmetic	6.5	Marks on head of cartridge				
Formmarken und narbige Erscheinungen > 1 mm² auf der Glaskörperaußen- oberfläche; Dichtigkeit nicht beeinträchtigt	kosmetisch	6,5	Rattermarken am Konus		Contraction		
			Wrinkles on head of cartridge <i>Quetschfalten</i> <i>am Bördelkopf</i>				

Define the risk of the individual parameter and acceptance level!

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• **Test Methods** finally derive from established **Test Parameter**

- Accuracy of the method
 - Tolerance (decimal place) of dimensions in the technical drawing?
- Extent of inspection
 - What needs to be tested for individual batches (inspection level)?
 - Supplier data on Certificate of Analysis
- Test interval
 - Complete / reduced testing
 - Identity, monitoring or skip lot?





CHEMICAL TESTING

• Determination of the hydrolytic resistance is an important parameter to guarantee the quality of the glass composition.

• Just to resume ...

Type I glass: borosilicate; only for tubing; in compliance with Pharmacopeia requirements for injectable liquids because of its high chemical durability; lower thermal expansion; flint or amber

Type II glass: soda-lime treated on inner surface (0.5 mm) to remove free alkali ions; high chemical durability; only for tubing; high thermal expansion; non suitable for injectable liquids; only light amber

Type III glass: soda-lime; moderate chemical durability; for tubing and molding; high thermal expansion; non suitable for injectable liquids; variously colored.



CHEMICAL TESTING

Relevant USP Glass Testing Procedures

USP/NF Section <660> Type I Highly Resistant Borosilicate Glass

- Hydrolytic Resistance Glass Grains
- Surface Glass Test
- Arsenic USP <211>
- Light Transmission (Amber)

Relevant European Pharmacopeia

EP 3.2.1 Glass Containers for Pharmaceutical Use

Relevant Japanese Pharmacopeia

JP 7. Test for Containers and Packaging Materials 7.01 Test for Glass Containers for Injections



THE JAPANESE HARMACOPOEL







Endotoxin- / Bioburden- Testing

Endotoxin LAL-Test (according to Ph. Eur. 2.6.14 ; USP <85>, JP)

Bioburden (according to Ph. Eur. 2.6.1; USP <71>, JP)







- Caliper
- Micrometer caliper
- Outside micrometer
- Plug gauge
- Profile projector (manual or electronically)
- Electronic camera measuring system





- VISUAL INSPECTION INSPECTION BY ATTRIBUTES
 - Special attention should be taken on visual nonconformities to align incoming inspection parameters with the relevant control units of the filling / inspection lines
 - Defects are described and classified
 - PDA Glass Task Force Technical Report 43
 - Edito Cantor Defect Evaluation List







• These reports provide a general overview of defects including a classification of the potential criticality

CRITICAL - MAJOR - MINOR

to support a quality decision-making process

- The characteristics of these defects can vary, therefore the acceptance level should be individually defined
- The sensitivity of camera control units should also be taken into consideration
- Defects may not be equally distributed across the batch manufacturing process (nested)
 Orange Peel Location: Finish/Neck
 Class: Minor (Limit Sampled)









Glass Nonconformity Lexicon (PDA TR 43)

- **CRITICAL** A Nonconformity that is likely to result in personal injury or potential hazard to the patient (including defects that compromises the integity of the container
- **MAJOR A** ... leading to serious impairments e.g. a malfuction that makes the packaging unusable
- **MAJOR B** Impairments of a lesser degree e.g. reduced efficiency in production

MINOR Nonconformity that does not impact product quality or process capability

N/A An imperfection not classified as nonconformity



• The characteristics of defects can vary







Surface diagonal lines around the neck that may give a feathery or frosty appearance.

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Minor defects can result in significant disruption and yield losses on the filling / inspection lines



Excerpt TR 43 PDA Glass Task Force



Sampling for Incoming Inspection

• 21CFR820.250 – Statistical Techniques

"(a) Where appropriate, each manufacturer shall establish and maintain procedures for identifying valid statistical techniques required for establishing, controlling, and verifying the acceptability of process capability and product characteristics.

(b) Sampling plans, when used, shall be written and based on a valid statistical rationale. Each manufacturer shall establish and maintain procedures to ensure that sampling methods are adequate for their intended use and to ensure that when changes occur the sampling plans are reviewed. These activities shall be documented."



Defects and Acceptance Levels

 Prevailing method for evaluation of defects: Commonly used Acceptance Sampling Plans



- Widely used sample inspection system originally developed as U.S. military standard 105E plans
- The AQL system (Acceptable Quality Limits) has been accepted by national and international quality associations (DIN ISO Norm 2859, ASQ/ANSI)
- Provides acceptance and rejection rates based on normal statistical distribution



- Defects and Acceptance Levels
 - Control Sample Unit (Tailgate samples) is important for evaluation of a batch
 - Samples should be representative and randomized across the entire batch
 - Sampling often delegated to supplier
 - The number of samples for incoming inspection depends on batch size and defined AQL
 - AQL represents the percentage of defects routinely accepted



- DIN ISO 2859 has different levels for reduced, normal and tightened inspection
- Influencing on the certainty when accepting or rejecting material and the inspection cost

		s s	Special Inspection Levels				General Inspection Levels		
	Losumfang S 1		§ 2	S 3	S 1	1	()	ш	
2	Lot Size	A	А	A	A	A	A	в	
9	bis 15	A	Α	Α	A	A	в	с	
16	bis 25	A	A	В	В	в	С	D	
26	bis 50	A	в	в	С	С	D	E	
51	bis 90	в	в	С	С	С	E	F	
91	bis 150	в	в	С	D	D	F	G	
151	bis 280	в	С	D	E	E	G	н	
281	bis 500	в	с	D	E	F	н	J	
501	bis 1 200	с	с	E	F	G	J	к	
1 201	bis 3 200	С	D	E	G	н	к	L	
3 201	bis 10 000	с	D	F	G	J	L	м	
10 001	bis 35 000	с	D	F	н	к	, M	Ν	
35 001	bis 150 000	D	E	G	J	L	N	Р	
150 001	bis 500 000	D	E	G	J	М		Q	
500 001	und mehr	D	E	н	к	N	Q	R	

Excerpt DIN ISO 2859



- Code letter defines the number of Tailgate Samples for inspection
- Acceptance / rejection numbers are listed in the AQL columns



Tabelle 2-A - Single Sampling Plan (Normal Inspection)

Annahmezahl Rückweisezah Excerpt DIN ISO 2859

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- AQL 0.65
 - Acceptance limit 10 Rejection limit 11 defects
 - 0.65% AQL Quality Statement:

"If you sample 800 and use the acceptance criteria to accept on 10, reject on 11, you have ~95% probability of accepting the batch if it contains 0.65% defects or less"



- In most cases Tailgate samples are pulled by the supplier during manufacturing
- Sampling is an important process
- Valid conclusions on the whole batch can only be made on representative samples
- Correct sampling is an essential part of the supplier Quality Assurance practice
- Samples are packed separately by the supplier and delivered with the batch shipment
- Sampling is delegated to supplier per contract, verification during audits & dual batch sampling





Requirements for Inspection



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- Specification
- Sampling
- Sample Size
- Equipment, Tools
- Documentation
- Supplier Certification



Specifications (EU-GMP; Cap. 4)

- Describe in detail the requirements with which the products or materials used or obtained during manufacture have to conform. They serve as a basis for quality evaluation
- All documents describing the material belong to the specification
 - Technical Drawing
 - Material Characteristics
 - Regulatory Requirements (e.g. Ph. Eur.; USP; JP)
 - Test Parameter
 - Certification of Parameter





Specifications (EU-GMP; Kap. 4)

- Batch testing / release is based on these documents
- It is recommended to agreed on inspection methods upfront with supplier
 - Visual Inspection (limit sample, defect catalogue)
 - Specific methods not described in literature
 - Method comparison
 - Accuracy of measurement
 - Sample defect catalogue

Quality Agreement!





Supplier Approval Process





Tailgate Samples with each Delivery





Index of a Packaging Material Specification (Example)

- 1. Material Specific Chapter Technical Drawing
- 2. General Chapter
- 2.1 Material & Design
- 2.2 References & Standards
- 2.3 Packaging Instructions
- 2.4 Quality Acceptance Criteria
- 2.5 Supplier control samples (sampling plan)
- 3. Characteristics / Specifications
- 3.1 Criteria for Batch Release
- 3.2 Additional Criteria e.g. glass grain test anually
- 3.3 Specific Criteria e.g. microbial testing
- 4. Sample Procedure & AQL Acceptance





- ⇒ Correct pallets used (heat treated)
- ⇒ Correct labeling
- ⇒ No visible transport damages
- Documents compete (delivery note, certificate)
- Correct supply chain (supplier manufacturer)





How to do it in practice

Example of a two phasic inspection approach (by attributes)





Visual Inspection

 In order to standarize the inspection it can be helpful to use the method described in Ph. Eur. Method 2.9.20. Particulate Contamination: Visible Particles. Terms and conditions are defined.

Intensity of light
Duration under review
Viewing background





Visual Inspection

- Documentation of inspection results
 - Reporting of individual inspection criteria e.g. scratches, cracks, dirt
 - One generic criteria, combined with a defect catalogue and the corresponding AQL







Manual Profile Projector: Dimensional evaluation with specification template without data storage







Manual measuring devices or electronic camera systems









- Set up of a camera system: Reference lines and intercept points to be defined
- Further developments for image processing





How to do it in practice

Dimensional Inspection





How to do it in practice

Dimensional Inspection

Ø ADS A

Unit of measurement	Characteristics					
mm	Glazing ring diameter					
mm	Body diameter					
mm	Neck diameter					
mm	Flange diameter					
mm	Flange height					
mm	Neck height					
mm	Total lenght					
O	Upper locking ring angle					
0	Lower locking ring angle					
O	Shoulder angle					
mm	Excentricity					





- Three-dimensional rotationsymetric results
- Contact-free measurement
- Evaluation of multiple parameter of complex bodies







Dimensional Testing





Documents relevant for batch release

- Supplier documentation
 - Certificate
 - Specifications
 - Test Protocol
 - Delivery slip



- Test Methods
 - Standard Operating Procedures
 - Specifications
 - Test Plan

- Inspection documentation
 - Dimensional Results
 - Chemical Results
 - Visual Results
 - Test Protocols
 - Log Books



How to do it in practice





How to do it in practice

End of Part 2



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• Glass container for the pharmaceutical industry are standardized



Maße in mm Dimensions in mm

Maße in mm Dimensions in mm

								· · · · ·						· · · · · ·
d ₁	Grenz- abm.	d ₂	Grenz- abm.	d ₃	d ₄	Grenz- abm.	d 5	Grenz- abm.	d_6	Grenz- abm.	<i>h</i> 1	Grenz- abm.	h ₂	Grenz- abm.
	tol.		tol.			tol.		tol.		tol.		tol.		tol.
	±		±	min.		±		±		±		±		±
8,65	0,1	6,85	0,1	6,55	7,15	0,2	5,5	0,35	3,15	0,2	5,0	0,20	2,9	0,1
10,85	0,1	8,65	0,1	8,35	7,15	0,2	5,5	0,35	3,15	0,2	5,0	0,20	2,9	0,1
10,95	0,15	9,25	0,1	8,95	7,15	0,2	5,5	0,35	3,15	0,2	5,0	0,20	2,9	0,1
11,60	0,15	9,65	0,1	9,35	7,15	0,2	5,5	0,35	3,15	0,2	5,0	0,20	2,9	0,1
14,00	0,15	12,00	0,15	11,65	9,5	0,2	7,6	0,35	4,5	0,2	5,0	0,50	2,9	0,15
14,45	0,15	11,85	0,15	11,50	9,5	0,2	7,6	0,35	4,5	0,2	5,0	0,50	2,9	0,15
18,25	0,15	16,05	0,15	15,50	9,5	0,2	7,6	0,35	4,5	0,2	5,0	0,50	2,9	0,15

Excerpt DIN ISO 13926-1



- However, these standardized tolerances might lead to unacceptable variances of certain dimensions especially on fast running filling lines
- See table h1 and h2 for flange height: This can result in variances of ± 0,20 mm to ± 0,50mm depending on the format!

Maße in mm Dimensions in mm

<i>d</i> ₁	Grenz- abm.	d ₂	Grenz- abm.	d ₃	d ₄	Grenz- abm.	d 5	Grenz- abm.	d ₆	Grenz- abm.	h ₁	Grenz- abm.	h ₂	Grenz- abm.
	tol.		tol.			tol.		tol.		tol.		tol.		tol.
	±		±	min.		±		±		±		±		±
8,65	0,1	6,85	0,1	6,55	7,15	0,2	5,5	0,35	3,15	0,2	5,0	0,20	2,9	0,1
10,85	0,1	8,65	0,1	8,35	7,15	0,2	5,5	0,35	3,15	0,2	5,0	0,20	2,9	0,1
10,95	0,15	9,25	0,1	8,95	7,15	0,2	5,5	0,35	3,15	0,2	5,0	0,20	2,9	0,1
11,60	0,15	9,65	0,1	9,35	7,15	0,2	5,5	0,35	3,15	0,2	5,0	0,20	2,9	0,1
14,00	0,15	12,00	0,15	11,65	9,5	0,2	7,6	0,35	4,5	0,2	5,0	0,50	2,9	0,15
14,45	0,15	11,85	0,15	11,50	9,5	0,2	7,6	0,35	4,5	0,2	5,0	0,50	2,9	0,15
18,25	0,15	16,05	0,15	15,50	9,5	0,2	7,6	0,35	4,5	0,2	5,0	0,50	2,9	0,15

Excerpt DIN ISO 13926-1



- It can be important to know and understand the characteristics of the container of individual suppliers and their forming lines
- Monitoring of critical dimensional characteristics can give a good understanding of the packaging components





- Glass strength and breakage risk
 - Glass has no elastic constant for stability
 - Small superficial defects can have an impact on stability and breaking resistance
 - Glass to glass contacts during processing can be critical
 - Methods for investigation





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7,15±0,2



Glass stability testing results





Glass stability testing results





Glass stability testing – stopper mouth











StrainScope S4 - ilis

- GMP compatible photograpic documentation
- Fast multiple sample testing



Defects and Imperfections

- Defects / Imperfections are not always distributed across the entire batch
- Rare or nested defects may not be detected during incoming control
- Glass forming process variability controlled by IPC & control cameras









What to consider or to avoid (examples)





What to consider or to avoid (examples)











Description of Defect	Acceptable	Poor Quality
Deformed or damaged cartridges, function / processing NOT impacted		Molding ring slightly deformed








B546_Muster2_Bild3

























Container closure impacted, example from a field complaint







Container closure integrity impacted? Batch impact or singular event?















Description of Defect	Acceptable	Poor Quality
Closed air lines		











Description of Defect	Acceptable	Poor Quality
Contamination inside, not easy removable (not embedded)		

















Description of Defect	Acceptable	Poor Quality
Visible baked glass grit / chips On the glass surface		









Defects from filling operations – not always caused by supplier



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What to consider or to avoid

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CASE STUDY I: Vial collar with contamination after sterilisation





Supplier Manufacturing Process Investigation





- Investigation inconclusive no clear root cause identified
- Most probable cause: Oil contamination of the Polypropylen box





- Supplier Certification & Reduced Testing
 - Prerequisite for reduced testing

 ⇒ Quality History
 ⇒ Quality Management System
 ⇒ Supplier Certification
 - Risk Analysis to evaluate potential impact
 - ⇒ Reduction of individual test parameter
 ⇒ Supplier results disclosed on CoA
 ⇒ Determination of verification strategy (dynamic testing)
 ⇒ SKIP-Lot testing



- SKIP-Lot Testing
 - Not all incoming lots are inspected
 - ISO 2859-3:2005: Sampling procedures for inspection by attributes - Part 3: Skip-lot sampling procedures (industrial standard)
 - Identity testing for pharmaceutical products required
 - Should only be used when it has been demonstrated that the quality of the product is very good



• EU GMP Guideline, Part I, Chapter 5

• Manufacturers of finished products are responsible for any testing of starting material as described in the marketing authorisation dossier

They can utilise partial or full test results from the approved starting material manufacturer but must, as a minimum, perform **identification testing** of each batch ...

- Requirements to be fullfilled when accepting test results from suppliers
 - Audits at appropriate intervals (sampling & testing)
 - CoA signed by a designated person (qualification)
 - History of compliance
 - Full analyses at appropiate intervals

Note: The same applies to packaging materials



- US GMP Regulations 21 CFR 211
 - ⇒ Sec. 211.84 Testing and approval or rejection of components, drug product containers, and closures

(d) (3) Containers and closures shall be tested for conformity with all appropriate written specifications. In lieu of such testing by the manufacturer, a certificate of testing may be accepted from the supplier, provided that at least a visual identification is conducted on such containters/closures by the manufacturer, and provided that the manufacturer establishes the reliability of the supplier's test results through appropriate validation of the supplier's test results at appropriate intervals.









Reference samples

EU Guidelines to Good Manufacturing Practice, Volume 4 Annex 19

Reference and Retention Samples

Reference sample: a sample of a batch of starting material, <u>packaging</u> <u>material</u> or finished product which is stored for the purpose of being analysed should the need arise during the shelf life of the batch concerned.

 Each packaging site should keep reference samples of each batch of primary and printed packaging materials.



Risk of Delamination

- The phenomenon gained attention of pharmaceutical industry in 2010 as a result of products recalled from the market (vials).
- An advisory was published by the FDA informing drug manufacturers of the phenomenon and the conditions associated with elevated risk of delamination. http://www.fda.gov/drugs/drugsafety/ucm248490.htm
- Glass delamination is a serious concern for parenteral products. The phenomenon represents a chemical reaction that results in the release of tiny glass particles called "lamellae" into the product container. Not only does the occurrence of lamellae indicate a product stability issue but may also present a risk to patient safety.





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- Risk of Delamination
- Hot Topic in 2010

FDA rejects Gilead's next big HIV drug over glass vial issues



Gilead on Tuesday received a rejection letter for its latest potential first-in-class HIV drug, as the company said the FDA cited Chemistry Manufacturing and Controls (CMC) issues relating to the compatibility of lenacapavir with its proposed container vial.

Regulators previously slapped a clinical hold on 10 trials studying injectable versions of the experimental HIV treatment, known as lenacapavir, due to concerns that vials made of borosilicate glass could lead to the formation of sub-visible glass particles in the solution.

RELATED: FDA slaps a hold on Gilead's injectable HIV treatment over concerns about potential glass contaminants



Mondad Darcov

"Gilead intends to provide FDA with a comprehensive plan and corresponding data to use a different vial type," Gilead CMO Merdad Parsey said in a statement. "We look forward to discussing this further with FDA over the coming months so that we can make this investigational new therapy available to people living with multidrug-resistant HIV as soon as possible."

On the positive side for Gilead, the FDA did not request any new clinical trials in its CRL. Analysts previously estimated that lenacapavir sales will reach almost \$900 million by 2026, according to Evaluate.



Conditions associated with formation of glass lamellae

- High Heat During Glass Vial Manufacturing
- High pH Buffer
- High Ionic Strength
- Long Shelf-life
- Room Temperature Storage
- Terminal Sterilization





Delamination Risk

		Risk factor
Primary Packaging (PP)	Type I without or Silicone	1
	Type II with treatment	10
	рН	
Product Formulation (PF)	Buffer (B)	
	Ionic Strength (IS)	
	Complexing Agent (CA)	
	pH = 7</td <td>1</td>	1
	pH > 7 & =8</td <td>5</td>	5
	pH > 8 or acetate, citrate, phosphate Buffer or IS >0,1M or CA	10
	Without terminal sterilization	1
Process (PR)	Terminal sterilization (1 cycle)	5
	Terminal sterilization (more than 1 cycle)	10
	PP x PF x PR	
Overall Risk Rating		





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- Selection and Qualification of Supplier
 - Pre-qualification (questionaire, information, due diligence visit)
 - Negotiate contract(s)
 - Supplier audit
 - Agree upon specifications (sampling)
 - Quality Agreement
 - Mandatory if data from CoAs are accepted for incomming inspection
 - Sampling delegation
 - Quality requirements should be discussed and agreed with the supplier. This may include production, testing and control, including handling, labelling, packaging and distribution requirements, complaints, recalls and rejection procedures





- Supplier relationship management
 - Classification
 - Assessment
 - Monitoring and Trend Performance
 - Complaint Management
 - Supplier Information
 - Shared Reviews & Feedback



- Supplier Management
 - Specification Documents (contractual)
 - Quality Agreements
 - Supplier Audits
 - ISO 15378:2017 (en) Quality Management System for Medicinal Packaging Material Supplier

Specifies requirements for a quality management system for manufacturers of pharmaceutical and medical device primary packaging materials.

Manufacturers need to demonstrate their ability to consistently meet customer requirements, including regulatory requirements and international standards as applicable.



- ISO 15378 standard enables the supplier to comply with legal requirements for pharmaceutical and medical device primary packaging materials
- The standard integrates the requirements of ISO 9001 as well as GMP principles, a regulatory requirement for the pharmaceutical and medical device industries as per all international regulations such as Code of Federal regulations (US), and European directives and regulations
- The standard also helps to reduce the risks of safety hazards and product contamination to ensure product efficacy and shelf life.
- The standard delineates GMP principles and specifies Quality Management System requirements applicable to primary packaging materials



- Definition of defects
 - Can be quite subjective for visual parameter
 - Expected quality might be higher than described in official defect lists e.g. high value products
 - Some imperfections are process intrinsic
 - Other factors that may influence acceptance level, e.g. product delivery market e.g. Japan



Coordination process between packaging manufacturer and customer

 CASE STUDY II - Defect Vial identified during In-Process Control in combination with an unusual high reject rate





Picture 5: Vial nonconformity and visible tool marks (magnification 50x)



- Hypothesis: Poor glass batch
- Specific examination of 1250 vials resulted in 57 vials with declared imperfections – mostly pressure marks





- Internal evaluation by Incoming QC: Quite faint imperfections
- Supplier complaint initiated and samples sent
- Complaint Investigation Result: The pressure marks do not effect the function or integrity of the glass and are considered conforming as no <u>Limit Sample</u> is defined.



Limit Sample (optional)

- Physical unit that is agreed between manufacturer and customer that defines the maximum degree of acceptability of an imperfection
 - Subjective Defect
 - Objective Defect







 CASE STUDY III: High rate of rejections during automated control of filled vials resulted in a very precise manual reevaluation





Small bump checks also visible on not processed vials

OM OADMO,



- CASE STUDY IV Broken glass vials in packaging
- During packaging of a liquid product in 5 mL vials chipping of vial bottoms were observed
- During investigation, additional glass defects identified in retained samples
- Type of defect can not be identified during visual inspection
- Containment of affected glass / product batches not clear to be defined



Coordination process between packaging manufacturer and customer

• Case Study – Glass vial defect in Packaging







Coordination process between packaging manufacturer and customer





Coordination process between packaging manufacturer and customer



Potential Product Impact





Coordination process between packaging manufacturer and customer

Investigation identified new phenomenon (B)





Phenomenon B – "Heel Stickers"/Scratches



Coordination process between packaging manufacturer and customer







Heal Sticker



Nonconformity Classifications

Critical: A Nonconformity that is likely to result in personal injury or potential hazard to the patient. This classification includes any nonconformity that compromises the integrity of the container, and risks microbiological contamination of a sterile product.

Major A: A Nonconformity leading to serious impairments, for example, a malfunction that makes the packaging unusable.

Major B: A Nonconformity leading to impairments of a lesser degree, for example, reduced efficiency in production.

Minor: A Nonconformity that does not impact product quality or process capability.

N/A: An imperfection classification that is less than the size, magnitude and impact of a nonconformity is considered not applicable.





- In-house Investigation
- Supplier complaint initiated
- Finally, Root Cause was identified as an incorrect set-up of the packaging line leading to high mechanical forces to the vials





• CASE STUDY V

Glass chippings at the glazing end







Incidences during incoming inspection





Re-inspection results of selected batches

Batch	Defect Rate Tailgate	Sorted units	Defect Rate after sorting
А	1.5%	> 900,000	0.001 %
В	1.2 %	> 900,000	0.002 %
С	0.48 %	> 90,000	0 %



Incoming Inspection of Primary Packaging Material



 Shared Investigation: Processing of Tailgate Samples vs. Material Batches





Investigation of glass stability pre-/ post-shipment















Improvement potential visual inspection (light box)













- Single root cause could not be identified
- Several contributing factors have been identified and related improvements implemented at both parties
- Since implementation of the related CAPAs no further batches have been rejected
- Partnership with supplier is an important factor for resolution of this type of issues



• CHIPS – Single event or indicative for batch quality

- A fragment of glass missing or broken away from the surface. No malfunction
- Location: general

Source	Class	Remarks	
FBL	Minor	Non-functional areas, no malfunction	
PDA	Major A	If seal integrity in sealing area is not compromised	
	Major B	otherwise	







Chipped Sealing Surface

Location: Seal Surface

Class: Critical if seal integrity compromised; Major A if seal is intact.



A finish that has a small section or fragment missing or broken away from the sealing surface.





• Rare single glass defects



Glass defect with a hole in the shoulder area, causing leakage during use



Turbid vial identified during inspection with a passedthrough crack that caused a loss of integrity



Defect is ascribable to a glassy spot – may function as a stress concentrator factor



Summary of Controls

- Supplier
 - IPC: Inspection during processing
 - Final QC: Inspection of finished product
 - Reference Samples
- Pharmaceutical Manufacturer
 - Receiving/Incoming QC: Inspection for quality-determining parameters and/or the manufacturer's (supplier) certificate
 - Documentation: Recording of inspection data in suitable archives
 - Reference Samples





Thank You!





- EudraLex Volume 4 Good Manufacturing Practice (GMP) guidelines
 - Part I, Chapter 1: Pharmaceutical Quality System
 - Part I, Chapter 4: Documentation
 - Part I, Chapter 5: Production
 - Annex 8: Sampling of Starting and Packaging Materials
 - Annex 19: Reference and Retention Samples
- Code of Federal Regulations 21 CFR 211
 - Section 211.80 General requirements
 - Section 211.84 Testing and approval or rejection of components, drug product containers and closures
- ISO 15378:2017 Primary packaging materials for medicinal products -- Particular requirements for the application of ISO 9001:2015, with reference to good manufacturing practice (GMP)
- DIN ISO 2859 Sampling Procedures for Inspection by Attributes, -3 Skip Lot Testing
- DIN ISO 13926 Pen Systems part 1: Glass Cylinders for Pen-Injectors for Medical Use
- PDA Technical Report-43 Revised: Identification and Classification of Nonconformities in Molded and Tubular Glass Containers, for Pharmaceutical Manufacturers, 2013
- Principles for the Defect Evaluation Lists for Packaging Material, Edito Cantor Verlag fur Medizin und Naturwissenschaften GmbH, 5th Edition 2017



References Pharmacopeias

- Glass Testing Procedures
 - USP/NF Section <660> Type I Highly Resistant Borosilicate Glass
 - Ph. Eur. 3.2.1 Glass Containers for Pharmaceutical Use
 - Japanese Pharmacopeia 7.01 Test for Glass Containers for Injections
- Endotoxin- / Bioburden- Testing
 - Endotoxin LAL-Test (according to Ph. Eur. 2.6.14; USP <85>, JP)
 - Bioburden (according to Ph. Eur. 2.6.1; USP <71>, JP)
- Visible Particles
 - Ph. Eur Method 2.9.20 Particulate Contamination, Visible Particles