

DBA

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The Journal of David Begg Associates

Issue 2 Spring 2006

Course Updates

What David Begg Associates courses are coming up in the spring and summer.

Industry News

The latest pharmaceutical industry news with Bob Pietrowski.

Tech Talk

How good is your documentation system? Ten simple questions to help you decide.



David Begg associates

welcome

A Very Happy 2006!

A very warm welcome to this, the second issue of DBA Journal, the magazine of David Begg Associates, in which we keep you abreast of pharmaceutical industry developments, new regulations and current 'hot topics' as well as providing useful information about our upcoming training courses and an insight into our very own DBA people.

In this issue, Bob Pietrowski highlights important changes proposed to the current EU GMP requirements for sterile products and newly implemented GMP guidance impacting on manufacturers of vaccines, plasma products and other biologicals.

Tech Talk provides you with ten simple questions to help you judge the quality of your documentation system and in Location, Location, Location we spotlight the Hilton Hotel, Cobham, one of our new venues for 2006 - chosen to meet your specific demands.

Thank you for your feedback on the DBA Journal.

We would like to thank all of our readers who contacted us with comments and suggestions from the first edition of the DBA Journal and your impressions of our new 'styling' for training course brochures. Almost without exception, your comments were very positive and very helpful. Be sure that we endeavour to act upon your suggestions on any aspect of our business wherever we can, please keep them coming!

New mailing schedule is a hit!

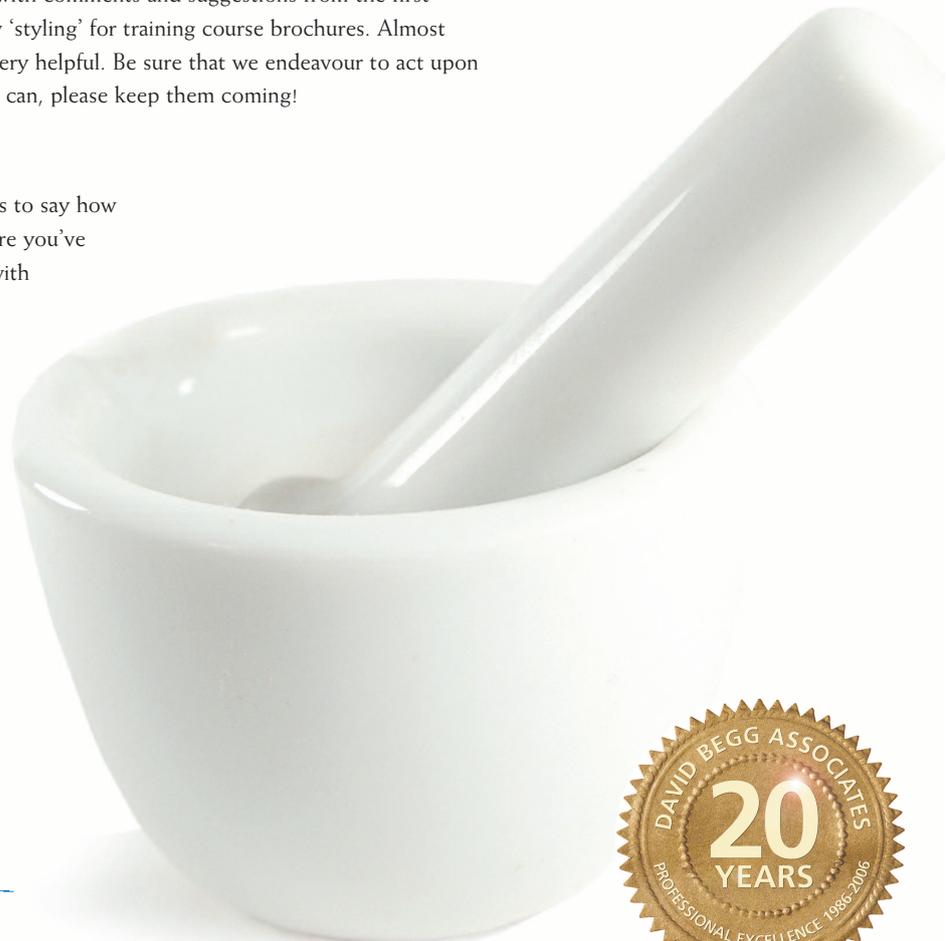
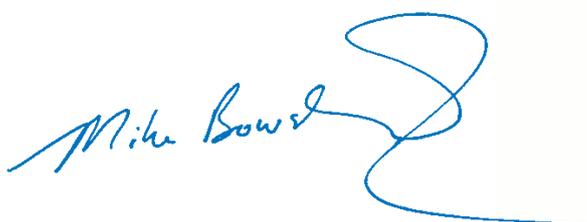
Although it is still early days, many of you have contacted us to say how much you prefer our new mailing schedule, where, as I'm sure you've noticed, we mail course brochures just once and follow up with just one email reminder.

I must admit that we were a little nervous about making this change, but your supportive comments and eagerness to attend our courses give us confidence that we have done the right thing by reducing the amount or paper we send to you! Thanks.

I hope you enjoy this second issue of the DBA journal. Please keep on sending us suggestions for improvements and future articles. We love to hear from you.



Mike Bowsher,
Managing Partner
David Begg Associates



Industry News

with DBA's Bob Pietrowski

EU Annex 1 To Be Amended.

The European Medicines Agency has published proposals for further amendments to Annex 1, Manufacture of Sterile Medicinal Products. The Major proposals are...

- Clean room classification to be performed in accordance with ISO14644-1, but one cubic metre air samples are required.
- Whilst the maximum permitted number of particles at ≥ 5.0 microns remains at 1 per cubic metre, 'false counts' of up to 20 per cubic metre 'could be considered'.
- It is recommended that 'in operation' classification be demonstrated during media fills as these represent worst-case.
- Whilst continuous particle counting is generally required for Grade A zones and recommended for Grade B, for monitoring purposes one cubic metre sample volumes are not required.
- Requirements for numbers of containers, acceptance criteria and follow-up actions are defined for media fills. The guidance is consistent with recent FDA requirements.
- Pre-sterilisation bioburden determination is required for every batch of aseptically prepared product and those terminally sterilised products subject to parametric release. Terminally sterilised products subjected to an overkill cycle need only be monitored at 'suitable scheduled intervals'.
- Partially stoppered freeze drying vials should be maintained under Grade A conditions at all times, from the time of partial stoppering and capping. EMEA regard the vial to be at risk of contamination until the cap is crimped in place. It is accepted that the capping station may not meet Grade A conditions in operation for non-viable particles, but should meet the microbiological requirements. Presumably EMEA expect the capper to be located in a Grade B clean room in order to meet these requirements.

These proposals are open to comment by industry until 30th April 2006.

These and many other issues associated with the manufacture and control of sterile products will be discussed during our four day training course entitled 'Sterile Product Manufacture' to be held in Cobham, Surrey from 25th to 28th September 2006.

Annex 18 Becomes Part 2 of EU GMP Guide – but with subtle change in scope for vaccines, plasma products and gene therapy products.

Annex 18, Good Manufacturing Practice for Active Pharmaceutical Ingredients, has, as expected, been adopted as Part 2 of the EU GMP Guide.

However, not every one may have noticed a subtle change in scope which accompanied this change.

The original Annex 18, and ICH Q7a on which it was based, specifically excluded all vaccines, whole cells, whole blood and plasma, blood and plasma derivatives (plasma fractionation) and gene therapy APIs. However, Part 2 now only excludes whole blood and plasma, bringing vaccines, plasma products and gene therapy products into the scope of this part of the guide.

It is intended that existing Annexes relevant to the products (e.g. Annex 2 and presumably Annex 14) will be revised. Until then, manufacturers may choose to follow the guidance in these Annexes or that in Part 2. This leaves the manufacturer with a short-term decision to make and also a GMP dilemma, since under Annex 2 paragraph 30, the establishment of seed lots and cell banks is clearly a GMP activity, whilst Part 2 Table 1: Application of this Guide to API Manufacturing (which appears in ICH Q7a but did not appear in Annex 18) appears to exclude the preparation of seed lots and cell banks!

No doubt all will be clarified when the appropriate Annexes are re-written!



Bob Pietrowski PhD, CBIol, MIBiol.

A Microbiologist by training, Bob has extensive experience of biologicals and biotech manufacture and is fully conversant with EU and US expectations for sterile products of all types.

Forthcoming Courses

What's planned for the next six months, March 2006-August 2006



Quality Management Systems

Qualified Person & Professional Development Training

Marriott Hotel, York, UK
13 – 17 March 2006

A comprehensive, five day course designed to teach you all you need to know about the philosophy and practice of quality management. In addition to providing key guidance of the design, implementation, monitoring and review of a pharmaceutical quality system, the course will provide training on the management skills required by a pharmaceutical quality professional.

Course Fee £2,630.00 Plus VAT

Free Seminar for Prospective Qualified Persons

Marriott Hotel, York, UK
14 March 2006

Interested in becoming a QP? Why not attend this free seminar to find out more about what we can offer. Learn about what is required to become a QP and see one of our training modules in action.

Pharmaceutical Risk Management

Marriott Victoria & Albert Hotel, Manchester
20 – 23 March 2006

Pharmaceutical risk management is the latest "hot topic" in GMP! The FDA have stated that they will use risk assessment in their inspections and expect manufacturers to adopt risk-based quality systems. Furthermore, adoption of ICHQ9, "Pharmaceutical Risk Management" will make it an international GMP expectation. Come and learn what exactly is expected and how to apply risk management techniques to your quality operations.

Course Fee £1,945.00 Plus VAT

Effective Pharmaceutical Audits and Self-Inspection

Hilton Hotel, Cobham, UK
27 – 30 March 2006

Learn how to carry out audits and self-inspections with skill and sensitivity, whilst ensuring that you do not overlook important issues. This course will help you to make your audits really value adding. In addition you have the opportunity to become a DBA certified auditor.

Course Fee £1,945.00 Plus VAT.

Effective Change Control

Marriott Victoria & Albert Hotel, Manchester, UK
4-6 April 2006

The control of planned and unplanned changes is perhaps the greatest challenge facing any pharmaceutical company and its quality management personnel. This highly popular three day course will provide you with practical guidance on how to simplify your change control systems to make them quick and efficient, whilst at the same time ensuring compliance with regulatory expectations.

Course Fee £1,490.00 Plus VAT.

Pharmaceutical Good Manufacturing Practice

Clontarf Castle Hotel, Dublin, Ireland
24 – 27 April 2006

Europe's most popular GMP course! An excellent overview of EU and US GMP regulations and expectations, plus up to the minute guidance on current "hot topics".

Course Fee £2,240.00 Plus VAT.

Engineering Aspects of GMP

Marriott Victoria & Albert Hotel, Manchester, UK
8 – 11 May 2006

This highly popular four day course is designed to provide engineering staff with the knowledge to apply GMP principles and requirements to their activities and provide QA staff with an understanding of the special challenges associated with engineering issues. The course is highly practical and includes practical demonstrations of techniques such as orbital welding of stainless pipes and how to test the quality of steam used for sterilisation.

Course Fee £1,945.00 Plus VAT

Practical Module (Formulation, Manufacturing, Analysis)

University of Strathclyde, Glasgow, UK
15 – 19 May 2006

An ideal opportunity to gain "hands on" experience of the procedures and equipment used to formulate, manufacture and analyse all the major dosage forms, including steriles. A lack of true understanding of the practical issues of dosage form manufacture is a common cause of failure at QP assessment. Don't let this happen to you.

Course Fee £2,775.00 Plus VAT

Practical Aspects of Pharmaceutical Validation

Marriott Victoria & Albert Hotel, Manchester, UK
5 – 8 June 2006

This ever-popular four day course will provide you with sound, practical advice on how to organise, document and manage all aspects of qualification and validation to meet international GMP requirements. In addition, validation requirements for specific applications such as cleaning, labelling and packing sterile products, computer systems and many more will be covered.

Course Fee £1,945.00 Plus VAT

Book online at www.david-begg-associates.com



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Deviation Reporting and CAPA

Clontarf Castle Hotel, Dublin, Ireland

6 – 7 June 2006

This intensive two day course is designed to provide you with the tools, and the skills, to identify, correct and report the root cause of quality problems quickly and efficiently so that you can demonstrate that your Corrective And Preventative Action (CAPA) systems work!

Course Fee £1,325.00 Plus VAT

Investigational Medicinal Products

Qualified Person & Professional Development Training

Hilton Hotel, York, UK

19 – 20 June 2006

All you need to know about the latest legislation in EU and USA regarding clinical trials, GMP expectations for the manufacture of clinical supplies and the special challenges facing the Qualified Person.

Course Fee £1,110.00 Plus VAT

Role and Professional Duties of the Qualified Person

Qualified Person & Professional Development Training

Hilton Hotel, York, UK

21 – 23 June 2006

This final module in the current series provides essential guidance not just on the legal duties of the qualified person, but also how the QP should organise themselves, their colleagues and the quality system to ensure that they fulfil their duties with skill and professionalism in the best interests of the patient and their employer.

Course Fee £1,610.00 Plus VAT

Management of Contract Services

Marriott Victoria & Albert Hotel, Manchester

26 – 29 June 2006

More and more companies are choosing to put activities and services out on contract rather than perform them in-house using company personnel. This course is designed to explain EU and US regulatory expectations for the management of contract services and provide practical guidance on exactly how this management should be organised for maximum efficiency and compliance.

Course Fee £1,945.00 Plus VAT

NEW
course

Microbiological Risk Assessment

Hilton Hotel, Cobham, UK

4 – 6 July 2006

Designed for both microbiologists and non-microbiologists, this three day course is designed to teach you how to use risk assessment techniques such as FMEA and HACCP to identify the critical control points in your processes, how to apply control measures and how to assess the risk associated with incidents and failures, so you can really bring your processes under effective control.

Course Fee £1,490.00 Plus VAT

Compliance Issues for Computerised Systems

Marriott Victoria & Albert Hotel, Manchester, UK

4 – 6 July 2006

Brought forward and extended by popular demand! This three day course will teach you all you need to know about EU and US regulatory expectations for computerised systems and will provide you with practical advice on how to satisfy these requirements efficiently and cost-effectively. Taught by two of Europe's leading experts in the field.

Course Fee £1,490.00 Plus VAT

NEW
course



Get in touch now to book your place
on any of these courses

Call us on +44 (0) 1751 432999

email: courses@david-begg-associates.com

Course details and prices are correct at the time of printing and are published in good faith.
DBA reserves the right to make any change which may become necessary.



Tech Talk

How Good is Your Documentation System?



Here are Ten Simple Questions to Help You Decide.

DBA has provided auditing, consultancy and training services to the pharmaceutical industry for over 20 years. Over this period we have seen a lot of documentation systems, both good and bad! As we all know, documents exist for some very good reasons:

- To reduce the likelihood of errors, particularly with the spoken word
- To improve consistency in all activities, that is to describe who must do what, how, when and why
- To provide traceability and a full history of activities and events

Documentation systems come with a huge price tag which our industry has previously accepted without question. As a consequence, the volume of paperwork has grown and grown, adding massive cost and complexity with very little obvious payback to either the patient or the company. Many companies now recognise that their traditional approach to documentation is totally inefficient and simply unaffordable in the long term. To help you improve your documentation system we have provided you with ten simple questions! They focus attention on the essential elements of documentation systems that really do benefit the patient and the business. To see how your system compares with "best industry practice" simply answer the following questions:-

1. Do you have a clear DOCUMENTATION HIERARCHY?

You must have a clear and well understood 'hierarchy' of documentation:

- You should have company wide policies relating to all aspects of your business. These high level documents should be short and detail the WHAT and WHY and steer clear of the HOW. If your policies are longer than 3 pages something is wrong.
- These high level policies should be customised and 'translated' into regional/site specific policies that suit the 'local' business environment. Although there is some operational flexibility, these local policies must comply with the higher level company policies.

Finally, these policy documents should be supported by more detailed 'How to Do' SOPs and Work Instructions, which focus on providing the user with the HOW - the detail to complete the task. All of these documents must be considered 'working documents' and readily accessible to everyone (not filed and forgotten!)

2. Do you have a DOCUMENTATION FILTER?

Documents are valuable when they have a clear purpose and provide real benefit. If they don't they become extremely costly. One of the major problems in the pharmaceutical industry is that it is too easy to write new documents! Some companies recognise this and take steps to prevent unnecessary documents being written. They stop (filter out) unnecessary documentation by asking the following simple questions:

- "WHY is this new document needed, what has changed?. After all, we've managed without it so far!"
- "What is the COST and what is the BENEFIT?"
- "Is there an alternative?"
- Does the SOP relate to a GMP activity?

3. Are your documents written with the ACTIVE PARTICIPATION OF THE USER?

Documents must be written for, and ideally by, the USER. Not the regulator or company auditor but THE USER! Not only will the document work, but it will be used.

- USERS must be involved at every stage
- By including the users the document becomes 'fit for purpose'
- All authors must be properly trained in technical writing skills (most people are very poor at technical writing!)

4. Are you being creative in DOCUMENT DESIGN?

Remember, easy reading is hard writing. Easy writing is hard reading. Good documents are well designed documents!

- Each type of document should have a standard template/format to ensure consistency
- Do you use pictures, schematics, drawings and colour as much as possible?
- Do you keep words to a minimum?
- Are your documents user friendly, allowing the reader to access the information and guidance quickly?

5. Are your SOPs restricted to GMP RELATED ACTIVITIES?

Ensure that SOPs are only written for GMP related activities and not for activities that have no GMP impact such as putting up the company flag, using the car park, fire drill and security procedures (all real life examples!).

6. Does every one of your documents have an OWNER?

This owner (or their successor) is responsible for the document throughout its life cycle:

- Generation
- Implementation
- Further improvement
- Amendment
- Trouble shooting

7. Do you ROAD TEST all 'How to Do' documents before implementation?

There is no such thing as a perfect SOP that works first time! Some companies recognise this and "road test" 'new' procedures before final implementation and approval. These SOPs are given 'interim' approval and a short expiry period. Following operational use they can then be updated in light of operational experience.

8. Do you ACTIVELY REDUCE the number of SOPs?

Companies that are 'best in class' realise that the number of SOPs must be managed.

They actively:

- Remove SOPs which have become obsolete
- Minimise duplication of SOPs

9. Is your SOP TRAINING really effective?

The best companies:

- Schedule in adequate training before implementation
- Ensure training is conducted by skilled trainers
- Use a combination of 'hands on' (preferred!) and classroom-based training

10. Do you constantly MEASURE THE PERFORMANCE of your documentation system?

Do you review:

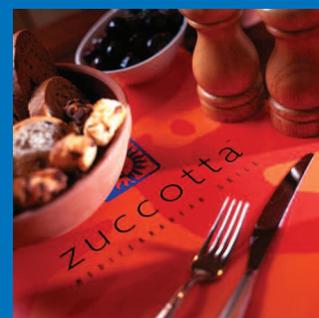
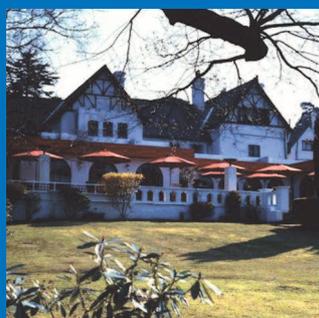
- The numbers of SOPs in use?
- Numbers of SOPs awaiting/overdue approval?
- Numbers of procedural non compliances?
- Numbers of SOPs removed/archived?

Do you regularly audit your documentation system?

The purpose of these questions is to help you identify what you need to do in order to improve the efficiency of your documentation system. If you would like to discuss any questions in more detail please do not hesitate to contact Martin Lush on +44 (0) 1751 432999 alternatively you can email Martin on mkl@david-begg-associates.com Remember, the quality of your product is very dependant on the quality of your paperwork. Don't ignore your documentation system!

Location, Location, Location...

You asked us to find venues more conveniently located for airports and major transport links.



Our exhaustive search yielded eight hotels which we believe provide you with all you need for a better place to learn.

We intend to spotlight each of these hotels in the coming editions of the DBA Journal starting with...

The Hilton Cobham.

A country retreat near to London and Heathrow Airport.

Set in 27 acres of woodland in the beautiful Surrey countryside, when you arrive at the Hilton Cobham it is difficult to believe that you are only 25 miles from the centre of London, one mile from junction 10 of the M25 – London's orbital motorway – and just 30 minutes by taxi from London's Heathrow Airport!

Surrounded by mature trees and shrubs and immaculately tended gardens, the hotel is a haven of tranquillity in the bustling South East of England, providing you with the perfect location to learn and relax. The Hilton Cobham is a mature building with traditional comforts, but it is far from being old fashioned. All rooms are decorated in a modern style and boast a desk, high speed internet access (for work!), games console (for play!), teletext TV with on demand movies and much more.

The more energetic can take advantage of the extensive fitness facilities at the Living Well Health Club, which features a heated indoor pool, spa and steam room as well as a fully equipped gymnasium with state of the art equipment. Should you wish to stretch your legs further, there are numerous

opportunities for jogging in the grounds and the nearby Surrey lanes. For the inner man (and woman) there are two restaurants; Zuccotta provides Mediterranean style cuisine in smart but relaxed surroundings, whilst Café Cino provides refreshments and light snacks all day. Oh, and by the way, the conference facilities are excellent so you should enjoy the course too!

We are confident that the Hilton Cobham will provide you with the convenience, comfort and professional service you need to make the most of your training. We look forward to welcoming you to the Hilton Cobham in the near future.

We shall be hosting the following courses at the Hilton Cobham in 2006

- **Effective Pharmaceutical Audits and Self-Inspection**
27-30 March 2006
- **Microbiological Risk Assessment**
4-6 July 2006
- **Pharmaceutical Good Manufacturing Practice**
18-21 September 2006
- **Sterile Products Manufacture**
25-28 September 2006
- **GMP for Clinical Trials Manufacture and Supply**
2-5 October 2006
- **Chemistry and Pharmacy Registration Requirements**
13-16 November 2006

DBA People

In each Journal we will spotlight a member of the DBA team, so that you can get to know us better. In this second issue, we focus on Martin Lush.



The Looniness of the Long Distance Runner!

As many of you already know, quite a few of your DBA team are keen runners. Although our running styles may differ, we all run because we enjoy it!

My own running apprenticeship started with the usual '10k's before graduating to half and full marathons. These were followed by ultra distance cross-country races with the odd triathlon thrown in for good measure. Bob Pietrowski has asked me to 'go public' with the answer to a question he has often asked. Why!?

The first obvious answer is to stay fit. Have you ever tried to get from Heathrow's Terminal Four to Terminal One in less than 40 minutes? The answer is you can't unless you're fit! For the ultra distance events there is an added incentive, that is the camaraderie of your fellow competitors. Races and events allow you to strike up instant friendships with perfect strangers of all shapes and sizes, and from different walks of life, who share the same interest.

One of my favourite events is the Helvellyn Triathlon, which is held annually in England's rugged Lake District. A very cold 1.5mile open water swim is followed by a 50-mile mountainous bike ride before the climax of the race, running up and down one of the highest mountains in the UK. This all precedes the real reason for many events, the post race pasta and beer party! These events are always very sociable and great fun for all the family.

What are my hopes and aspirations for 2006? Well, in addition to the usual races, Bob Pietrowski, Mike Halliday and I plan to run a marathon together in the summer. My ultimate goal, however, is to get from Terminal Four to Terminal One in 35 minutes flat! Now that really is ambitious!

Post script: For the last 5 years DBA have sponsored and helped to organise the 'Kirkbymoorside 10K', which was recently voted one of the Top Ten 10km races in the UK by Runner's World magazine. In addition to bringing enjoyment to many thousands of runners and spectators, the race has raised over £7,000 for local schools. Let us know if you would like an entry form. The race atmosphere is very special and the post race party even more memorable!

Congratulations to:

in the past six months, DBA has helped the following people obtain QP status:

Mark Girdwood, BPL. David Ling, AstraZeneca. Alan Mayo, Actavis, Malta. Hemal Patel, BPL. Mukesh Patel, Masterfoods.

In the next DBA Journal.

The Fast Lane the challenges facing a QP. Industry News as ever, we search for news of regulatory changes so you don't have to. DBA People how photography provides a soothing outlet for Pete Gough. Location, Location, Location... The Marriot Victoria and Albert Hotel, Manchester. Forthcoming Courses a review of training courses for Autumn and Winter 2006.

If you have any comments or suggestions for the next issue of the Journal, please email us at journal@david-begg-associates.com

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