

STANDARD OPERATING PROCEDURE
International Pharmaceutical Excipients Auditing, Inc.

Title Quality System Change Notification		Revision 1	SOP Number 19
Originator Irwin Silverstein	Approved By IPEA Management Committee	Effective Date Nov. 27, 2009	Page Page 1 of 4

PURPOSE:

This document describes the obligation of IPEA to notify applicants of change to the Excipient GMP Conformance Certification program requirements. It also obligates companies participating in the Certification program to notify IPEA of changes made to their quality system that may impact their certification.

SCOPE:

This procedure applies to the operation of the IPEA Excipient GMP Conformance Certification program and to all companies whose application for certification has been accepted or that have been certified.

RESPONSIBILITIES:

1. **IPEA Executive Management:** Responsible for assuring conformance of the Certification program to the requirements of this procedure, notification to applicants of changes to program requirements, as well as for the preliminary evaluation of change to the quality system reported by applicants.
2. **Applicant:** Promptly report to IPEA change that may impact their quality system as described in the procedure.
3. **IPEA Management Committee:** Review and approve the IPEA Certification Program Change Implementation Plan.

REFERENCES:

1. **SOP 7,** IPEA Certification Board
2. **SOP 8,** IPEA Certification Criteria
3. **SOP 9,** Certificate of Excipient GMP Conformance
4. **SOP 11,** Conflict of Interest
5. **SOP 14,** Application for Certification
6. **SOP 16,** Appeals, Complaints and Disputes
7. **SOP 17,** Post Certification Review
8. **SOP 20,** Conducting the Certification Audit
9. **SOP 22,** Confidentiality
10. **SOP 24,** Documenting the Audit
11. **SOP 25,** Authorized Use of the Certificate and Mark
12. **SOP 29,** Audit Report Sale

DEFINITIONS:

1. **Applicant:** The excipient manufacturer or distributor that has requested or has attained certification of a site for substantial conformance to The Joint IPEC-PQG Good Manufacturing Practices Guide for Pharmaceutical Excipients.

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2. **Applicant Change Implementation Plan:** The plan that describes the implementation of change that impacts the applicant GMP Quality System.
3. **Excipient GMP Conformance Certification Program:** The program administered by IPEA whereby excipient manufacturing sites are certified for substantial conformance to the Joint IPEC-PQG Good Manufacturing Practices Guide for Pharmaceutical Excipients.
4. **IPEA Certification Program Change Implementation Plan:** The plan that describes how change to the Excipient GMP Conformance Certification program is implemented.
5. **IPEA Executive Management:** The IPEA Chief Executive Officer (CEO) or Chief Operating Officer (COO).
6. **IPEA Management Committee:** The IPEA Management Committee comprises: Chief Executive Officer (CEO), Chief Operating Officer (COO), Secretary-Treasurer, and Immediate Past Chair of IPEC-Americas.
7. **Quality Unit:** The organization within the applicant or certified company with responsibility for conformance of the excipient to GMP and excipient quality requirements.

PROCEDURE:

I. Change to the Excipient GMP Conformance Certification Program

1. IPEA Executive Management (EM) evaluates changes to the Certification Program for possible impact to certified applicants. The procedures whose change may result in the need for modification to the applicant Quality System are noted in REFERENCES above.
2. Where a change that may impact an applicant is identified, EM develops an IPEA Certification Program Change Implementation Plan for review and approval by the IPEA Management Committee. The implementation plan is comprised of the following:
 - a. Description of the change to the Certification Program,
 - b. Potential impact of the change to the applicants,
 - c. Timeframe within which the applicants are to implement the change,
 - d. Verification schedule that the change by applicants has been completed,
 - e. Means by which the change is verified by IPEA, including whether verification is to be reviewed by the Certification Board, and
 - i. Prompt verification is conducted through review of confirmatory documentation, or
 - ii. On-site verification is conducted at the next scheduled site audit.
 - f. Establish a future effective date by which all applicants must comply with the new requirements, otherwise their certification is suspended.
3. The IPEA Management Committee approves the IPEA Certification Program Change Implementation Plan.

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4. IPEA provides each applicant with the IPEA Certification Program Change Implementation Plan.
5. The following types of change to the program are anticipated:
 - a. Revision to the IPEC-PQG Excipient GMP Guide for Pharmaceutical Excipients. The applicant would be expected to implement the changes by their next surveillance audit unless the audit was scheduled within six months of the revision date of the Guide. If the latter, then during the surveillance audit, the auditors would review the applicant's plan for implementation of changes and their adherence to the plan schedule.
 - b. Revision of IPEA program requirements as described in SOP 9, *Certificate of Excipient GMP Conformance*. Implementation would be expected as described in 5a.
 - c. Revision of IPEA program requirements in response to Regulatory Authority action. Regulatory Authority actions such as a new requirement to promptly register excipient manufacturing sites or to notify the Regulatory Authority of all Level 2 or 3 changes, as described in the IPEC-Americas *Significant Change Guide for Bulk Pharmaceutical Excipients* that commences within a short implementation timeframe. This type of action would necessitate verification by IPEA that procedures were in-place before the next scheduled surveillance audit. In that situation, measures other than site audit might be used to confirm implementation by the applicant is complete.
6. The applicant reports whether the change requires modification to their GMP Quality System.
 - a. Where change is needed, the applicant affirms they can meet the implementation schedule or provides justification for a delay in implementation at their site.
 - i. EM reviews and approves the delay in implementation by an applicant.
 - ii. If the delay in implementation is denied, the applicant can:
 1. Appeal the decision(*see SOP 16, Appeals, Complaints, and Disputes*) or
 2. Decide to allow the certification to expire.
 - b. Where change is deemed unnecessary, the next site audit of the applicant confirms that no modification to their GMP Quality System was required.

II. Change to the Applicant Quality System

1. The applicant promptly notifies the IPEA Administrator of any of the following changes that may impact the site Quality System or communication with the applicant such as:
 - a. Legal or commercial ownership,

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- b. Organization and management (e.g. key Quality Unit, managerial, or decision-making staff),
 - c. Contact name, address, phone number or e-mail address,
 - d. Scope of operations under the certified GMP management system, and
 - e. Major changes to the management system and/or processes, including any change that is evaluated as a Level 2 or 3 change according to the IPEC-Americas Significant Change Guide for Bulk Pharmaceutical Excipients.
2. The applicant notifies IPEA of the change. EM reviews the change for its potential to impact the certified quality system.
 - a. Where no change is expected, IPEA updates the applicant record.
 - b. Where an impact to the quality system is possible, the applicant is asked to submit an Applicant Change Implementation Plan that includes the following elements:
 - i. Description of the change,
 - ii. Assessed impact of the change to the quality system, and
 - iii. Timeframe within which the applicant will implement the change.
3. EM reviews the Applicant Change Implementation Plan and develops a verification plan that describes:
 - a. The verification schedule and
 - b. Means by which the change is verified, including whether review is required by the Certification Board.

HISTORY OF REVISIONS

Revision No.	Effective Date	Description of Changes
0	May 15, 2009	New Procedure
1	Nov. 27, 2009	Added I.2.f that stipulates an implementation due date after which the applicant certification is withdrawn.