

Third Party Solutions

IPEA



Presentation Outline

- **Excipient GMP Certification program**
 - ✓ **First 12 Months**
 - ✓ **ANSI surveillance audit**
 - ✓ **Reaction of FDA**
 - ✓ **IPEA surveillance audit**
- **IPEA Audit Program**
- **Conformance Services**
 - ✓ **Excipient Supplier Qualification**
 - ✓ **Excipient Supply Chain Security**
 - ✓ **Education**
- **Future Plans**

Excipient GMP Conformance

- Certify substantial Conformance to Excipient GMP
 - ✓ IPEC-PQG Excipient GMP
 - ✓ Forthcoming ANSI Standard
- FDA urged IPEA to certify site conformance to Excipient GMP
 - ✓ Accredited by ANSI
 - ∅ Conform to ISO/IEC Guide 65



Excipient GMP Certification

- Comprehensive Site Audit to Excipient GMPs
 - ✓ Minimum 2-days, 2 auditors, single excipient
- Certify Conformance
 - ✓ Issue Certificate
 - ✓ Post to Website
 - ✓ Audit report available at nominal cost
 - ∅ Off-set cost for certification
- Post on Website Certification Status
 - ✓ Certified
 - ✓ Certification suspended
 - ✓ Certification withdrawn



Excipient GMP Conformance Certification



IPEA Certification Program Oversight

- Certification Board
 - ✓ 4 Independent Qualified Experts
 - ⊗ Review Application, Audit Report, and CAPA plan to Certify
- IPEA Management Board
 - ✓ Internal Audit
- IPEA Board of Director
 - ✓ Annual Program Review
- ANSI
 - ✓ Annual Surveillance Audit

IPEA Certification

Auditor Competency and Qualification

- Education
- Audit Experience (Excipient or Pharmaceutical)
 - ✓ GMP Auditor
 - Personalized Training
 - ✓ CQA, ISO Lead Auditor, etc
 - Excipient Audit Workshop
- Supervised Qualification Audit
- Review of Audit Report by:
 - ✓ Audit Supervisor
 - ✓ IPEA Executive Management
- Consensus Acceptance by CEO and COO
 - ✓ Ongoing Performance Review



First 12 Months

- 6 Applications submitted
 - ✓ 4 Sites Certified
 - ∅ Grace Davison: Syloid Silicon Dioxide NF
 - Baltimore
 - Sorocaba
 - ∅ The Dow Chemical Company: PGUSP Propylene Glycol USP/EP
 - Freeport
 - Plaquemine
 - ✓ 2 Applications pending
- Typical time from audit to certification: 60-90 days
 - ✓ Corrective Action Plan review



First 12 Months

– Lessons Learned

- ✓ Certification Board expects to see CAPA plan
- ✓ Pharmaceutical companies want to see audit report
- ✓ Audit duration appears appropriate
- ✓ FDA expects to see dramatic increase in Certification

– IPEA Audit Program

- ✓ Still significant interest in one-day audit
- ✓ Three audits of 7 excipients scheduled in first half 2011



Reaction of FDA

- Pending announcement
 - ✓ Will drive interest in Certification
 - ⊘ Does IPEA have the resources?



ANSI Surveillance

- **First surveillance audit of IPEA**
 - ✓ **December 2010 review of documents and records**
 - ∅ 4 suggestions for improvement
 - ✓ **March 2011 witness assessment of IPEA surveillance audit**
 - ∅ 1 suggestion for improvement

No Non-conformances!



IPEA Surveillance Audit

- Annual site audit of certified facility
 - ✓ Assess 1/2 GMPs
 - ✓ Follow-up on corrective actions
 - ✓ Review changes to the site and above site organization
- Recertification
 - ✓ After two surveillance audits submit updated report to Certification Board
 - ⊗ Affirm continuing conformance
- Issue: We need to see operations at both weather extremes!



IPEA Surveillance Audit

- One auditor for 2 Days is preferred to 2 auditors 1 day
 - ✓ Verify completion of CAPA plan
 - ✓ Tour site operations
 - ✓ Examine records and reports
- Site provides CAPA plan for surveillance audit findings

IPEA Excipient Audit Program

- One-day site visit; 1 auditor
- Audit Sponsorship
 - ✓ Excipient Maker, or
 - ✓ Excipient User
- Audit report
 - ✓ List of observations
 - ✓ Summary of findings
 - ⊘ Major-listed in Executive Summary
 - ⊘ Minor-only noted in the Audit Details



IPEA Excipient Audit Program

- Report reviewed by IPEA management
- Maker reviews report
 - ✓ Correct errors
 - ✓ Note confidential information
 - ✓ Append CAPA plan
- User assesses observations and findings
 - ✓ Adequate Conformance?
 - ✓ Satisfactory CAPA?
 - ⊘ Follow-up on progress





IPEA Excipient Audit Program

- **Cost Effective Assessment**

- ✓ **Audit program designed to share reports**

- ⊗ **\$500 credit to Sponsor**

- ⊗ **\$1,500 cost for report to non-member company**

- **Customizable**

- ✓ **Sponsor can request review of designated areas or issues**

Conformance Services





Excipient Supplier Qualification

- FDA is expected to require supplier audit in next update to GMPs
 - ✓ Concerned that industry lacks resources to meet requirements
 - ✓ Options include:
 - ⊗ IPEA Certified excipient
 - ⊗ Rx360 Shared Audit Report
 - ⊗ Excipact approved excipient

Excipient Supplier Qualification

- Expectation: Audit all excipient suppliers
- Impact: Each audit cycle
 - ✓ Pharmaceutical Manufacturer
 - ∅ Hundreds to thousands of sites to audit globally
 - Pfizer reported 4,000 suppliers after 2003 mergers
 - ✓ Excipient Supplier (ISP-Texas City)
 - ∅ Host over 300 pharmaceutical audits at facility!
 - ∅ Host audits for other customers as well
- Reality: One-day Site Audit for key customers





Excipient Supply Chain Security

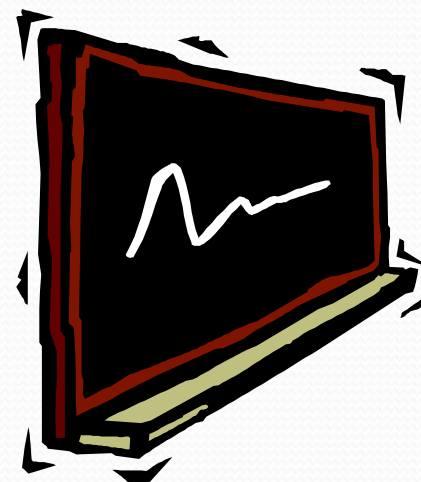
- Certification provides assurance:
 - ✓ Excipient is manufactured in substantial conformance to GMP
 - ✓ Manufacturer has adequate tamper-evident packaging
- Certification supports distributors:
 - ✓ Certified excipient manufacturers conform to GMPs
 - ∅ No need to assess their conformance
 - ∅ User audit of closed package distributor is simplified

Assuring Incoming Excipient Quality

- Confirm adherence to cGMPs thru audit or certification
 - ✓ Include subcontractors, repackagers, and distributors
- Excipient traceable through supply chain
 - ✓ Excipient Pedigree through paperwork
- Acceptance testing or COA plus ID Test
- Assessing Excipient Packaging
 - ✓ Container
 - ✓ Label
 - ✓ Tamper-evident Seal

IPEA Educational Services

- Excipient GMP Auditing
 - ✓ 3-day comprehensive workshop with mock audit
- Excipient Validation and Excipient Change
 - ✓ 1-day workshop
- On-site Training
 - ✓ Excipient GMP Auditing
 - ✓ Excipient GMPs





IPEA Future Plans

- Convert Certification from IPEC guide to Standard
 - ✓ ANSI Excipient GMP Standard approved in 2011
 - Expand Scope of Accreditation to Distributors
 - ✓ Certification to Good Distribution Practices (GDP)
 - ∅ IPEC GDP Audit Guide
 - Add value for excipient manufacturers by certifying to:
 - ✓ Food Additive requirements
 - ✓ Cosmetic requirements
- CONCURRENTLY**

Why Excipient Quality Matters!

