GOOD STORAGE AND DISTRIBUTION PRACTICES

(May 2019)

DRAFT FOR COMMENTS

Please send any comments you may have to Dr Sabine Kopp, Group Lead, Medicines Quality Assurance, Technologies Standards and Norms (kopps@who.int), with a copy to Ms Claire Vogel (vogelc@who.int) by 15 June 2019.

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SCHEDULE FOR DRAFT WORKING DOCUMENT QAS/19.793:

GOOD STORAGE AND DISTRIBUTION PRACTICES

Description of Activity	Date
During the Fifty-third WHO Expert Committee on Specifications for Pharmaceutical Preparations (ECSPP), the Expert Committee recommended consolidation of the <i>Good storage practices</i> and <i>Good distribution practices</i> for pharmaceutical products and the elements of good distribution channel guidance into one document.	22-26 October 2018
Preparation of first draft working document by Dr André Van Zyl, a member of the Fifty-third ECSPP.	December 2018 - March 2019
Mailing of working document to the Expert Advisory Panel on the International Pharmacopoeia and Pharmaceutical Preparations (EAP) inviting comments and posting of the working document on the WHO website for public consultation.	April – June 2019
Consolidation of comments received and review of feedbacks. Preparation of working document for discussion.	June 2019
Discussion of working document and feedbacks received during the informal Consultation on Good Practices for Health Products Manufacture and Inspection.	July 2019
Revision of the working document based on comments received during the informal Consultation on Good Practices for Health Products Manufacture and Inspection.	End of July 2019
Mailing of revised working document to the EAP inviting comments and posting the working document on the WHO website for public consultation.	August – September 2019
Consolidation of comments received and review of feedbacks. Preparation of working document for discussion.	End of September 2019
Presentation to the Fifty-fourth meeting of the ECSPP.	14 -18 October 2019
Any other follow-up action as required.	

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GOOD STORAGE AND DISTRIBUTION PRACTICES

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1. INTRODUCTION

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- 46 1.1. Storage and distribution are important activities in the supply chain management of
- 47 medical products. Various people and entities are generally responsible for handling, storage
- and distribution. Products may be subjected to various risks at different stages in the supply
- 49 chain, i.e. during purchasing, storage, distribution, transportation, repackaging, and relabelling.
- 50 Further, substandard and falsified products are a real threat to public health and safety.
- 51 Consequently, it is essential to protect the supply chain against the penetration of such
- 52 products.

53

- 54 1.2. This document sets out appropriate steps to assist in fulfilling the responsibilities
- 55 involved in the different stages within the supply chain and to avoid the introduction of
- substandard and falsified products into the market. The relevant sections should be considered
- as particular roles that entities play in the storage and distribution of medical products.

58

- 59 1.3. This guideline is intended to be applicable to all persons and outlets involved in any
- aspect of the storage and distribution of medical products from the premises of the manufacturer
- of the product to the person dispensing or providing pharmaceutical products directly to a
- patient or his or her agent. This includes all parties involved in trade, storage and distribution
- of medical products, manufacturers and wholesalers, as well as other parties such as brokers,
- 64 suppliers, distributors, logistics providers, traders, transport companies and forwarding agents
- and their employees.

66

- 67 1.4. The relevant sections of this guideline should also be considered for implementation
- by, amongst others, governments, regulatory bodies, international procurement organizations,
- donor agencies and certifying bodies, as well as all parties involved in any aspect of the trade
- and distribution of pharmaceutical products, including health care workers.

- 72 1.5. The guidelines can also be used as a tool in the prevention of the distribution of
- 73 substandard and falsified products. It should, however, be noted that these are general

- 74 guidelines which may be adapted to suit the prevailing situations and conditions in individual
- 75 countries. National or regional guidelines may be developed to meet specific needs and
- situations in a particular region or country.

- 78 1.6. To maintain the original quality of medical products, every party active in the supply
- chain has to comply with the applicable legislation and regulations. Every activity in the storage
- and distribution of medical products should be carried out according to the principles of good
- 81 manufacturing practices (GMP), good storage practice (GSP) and good distribution practice
- 82 (GDP) as applicable.

83

- 84 1.7. This guideline does not deal with dispensing to patients as this is addressed in the World
- 85 Health Organization (WHO) good pharmacy practice (GPP) guide (xx). These guidelines
- should also be read in conjunction with other WHO guidelines (*xx*).

87

2. SCOPE

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- 90 2.1. This document lays down guidelines for the storage and distribution of medical
- 91 products. It is closely linked to other existing guidelines recommended by the WHO
- 92 Expert Committee on Specifications for Pharmaceutical Preparations, such as
- 93 referenced in section (*xyz*).

94

- 95 2.2. Depending on the national and regional legislation, these guidelines may apply equally
- 96 to products for human and for veterinary use. The guidelines thus cover products for which a
- 97 prescription is required by the patient, products which may be provided to a patient without a
- 98 prescription, biologicals, vaccines and medical devices.

99

- 100 2.3. The document does not specifically cover GMP aspects of finished products in bulk,
- distribution of labels or packaging as these aspects are considered to be covered by other
- 102 guidelines. The principles for the distribution of starting materials (active pharmaceutical
- ingredients (APIs) and excipients) are also not covered here. These are laid down in the WHO
- 104 guidance "Good Trade and Distribution Practices for Pharmaceutical Starting Materials" (7).

106	3. GLOSSARY
107	
108	The definitions provided below apply to the words and phrases used in this guideline. Although
109	an effort has been made to use standard definitions as far as possible, they may have differen
110	meanings in other contexts and documents.
111	
112	active pharmaceutical ingredient (API)
113	Any substance or mixture of substances intended to be used in the manufacture of a
114	pharmaceutical dosage form and that, when used in the production of a drug, becomes
115	an active ingredient of that drug. Such substances are intended to furnish
116	pharmacological activity or other direct effect in the diagnosis, cure, mitigation
117	treatment or prevention of disease, or to affect the structure and function of the body.
118	
119	ALCOA
120	A commonly used acronym for "attributable, legible, contemporaneous, original and accurate"
121	
122	Auditing
123	An independent and objective activity designed to add value and improve an organization's
124	operations by helping the organization to accomplish its objectives by using a systematic
125	disciplined approach to evaluate and improve the effectiveness of risk management, control
126	and governance processes.
127	
128	batch
129	A defined quantity of pharmaceutical products processed in a single process or series of
130	processes so that it is expected to be homogeneous.
131	
132	batch number
133	A distinctive combination of numbers and/or letters which uniquely identifies a batch, for
134	example, on the labels, its batch records and corresponding certificates of analysis.
135	
136	
137	

consignment 138 The quantity of pharmaceutical products supplied at one time in response to a particular request 139 140 or order. A consignment may comprise of one or more packages or containers and may include pharmaceutical products belonging to more than one batch. 141 142 143 container The material employed in the packaging of a pharmaceutical product. Containers include 144 primary, secondary and transportation containers. Containers are referred to as primary if they 145 are intended to be in direct contact with the product. Secondary containers are not intended to 146 be in direct contact with the product. 147 148 149 contamination 150 The undesired introduction of impurities of a chemical or microbiological nature, or of foreign 151 matter, into or on to a starting material, intermediate or pharmaceutical product during handling, production, sampling, packaging or repackaging, storage or transportation. 152 153 154 contract 155 Business agreement for the supply of goods or performance of work at a specified price. 156 157 corrective and preventative actions (CAPA) A system for implementing corrective actions and preventive actions resulting from an 158 investigation of complaints, product rejections, non-conformances, recalls, deviations, audits, 159 regulatory inspections and findings, and trends from process performance and product quality 160 monitoring. 161 162 163 cross-contamination Contamination of a starting material, intermediate product or finished pharmaceutical product 164 with another starting material or product during production, storage and transportation. 165 166 167 168 169

170 distribution The procuring, purchasing, holding, storing, selling, supplying, importing, exporting, or 171 172 movement of pharmaceutical products, with the exception of the dispensing or providing 173 pharmaceutical products directly to a patient or his or her agent. 174 excipient 175 A substance, other than the active ingredient, which has been appropriately evaluated 176 for safety and is included in a drug delivery system to aid in the processing of the drug 177 delivery system during its manufacture; protect, support or enhance stability, 178 bioavailability, or patient acceptability; assist in product identification; or enhance any 179 180 other attribute of the overall safety and effectiveness of the drug during storage or use. 181 182 *expiry date* The date given on the individual container (usually on the label) of a pharmaceutical product 183 up to and including the date on which the product is expected to remain within specifications, if 184 stored correctly. It is established for each batch by adding the shelf life to the date of 185 manufacture. 186 187 first expiry/first out (FEFO) 188 189 A distribution procedure that ensures that the stock with the earliest expiry date is distributed and/or used before an identical stock item with a later expiry date is distributed and/or used. 190 191 forwarding agent 192 A person or entity engaged in providing, either directly or indirectly, any service concerned 193 with clearing and forwarding operations in any manner to any other person and includes a 194 195 consignment agent. 196 *good distribution practices (GDP)* 197 That part of quality assurance that ensures that the quality of a pharmaceutical product is 198 199 maintained by means of adequate control of the numerous activities which occur during the 200 distribution process as well as providing a tool to secure the distribution system from

201 counterfeits, unapproved, illegally imported, stolen, counterfeit, substandard, adulterated, and/or misbranded pharmaceutical products. 202 203 *good manufacturing practices (GMP)* 204 205 That part of quality assurance which ensures that pharmaceutical products are consistently produced and controlled to the quality standards appropriate to their intended use and as required 206 207 by the marketing authorization. 208 *good pharmacy practice (GPP)* 209 The practice of pharmacy aimed at providing and promoting the best use of medicines and 210 other health care services and products, by patients and members of the public. It requires that 211 212 the welfare of the patient is the pharmacist's prime concern at all times. 213 214 good storage practices (GSP) 215 That part of quality assurance that ensures that the quality of pharmaceutical products is 216 maintained by means of adequate control throughout the storage thereof. 217 218 *good trade and distribution practices (GTDP)* That part of quality assurance that ensures that the quality of pharmaceutical products is 219 220 maintained by means of adequate control throughout the numerous activities which occur during 221 the trade and the distribution process. 222 heating, ventilation and air conditioning systems (HVAC) 223 Heating, ventilation and air-conditioning, also referred to as environmental control system 224 225 (ECS). 226 importation 227 228 The act of bringing or causing any goods to be brought into a customs territory (national 229 territory, excluding any free zone). 230 231

- 233 intermediate product
- 234 Partly processed product that must undergo further manufacturing steps before it becomes a
- bulk finished product.

- 237 labelling
- 238 Process of identifying a pharmaceutical product including the following information, as
- appropriate: name of the product; active ingredient(s), type and amount; batch number; expiry
- 240 date; special storage conditions or handling precautions; directions for use, warnings and
- precautions; names and addresses of the manufacturer and/or the supplier.

242

- 243 manufacture
- 244 All operations of purchase of materials and products, production, packaging, labelling, quality
- control, release, storage and distribution of pharmaceutical products, and the related controls.

246

- 247 *marketing authorization*
- 248 A legal document issued by the competent medicines regulatory authority for the purpose of
- 249 marketing or free distribution of a product after evaluation for safety, efficacy and quality. It
- 250 must set out, inter alia, the name of the product, the pharmaceutical dosage form, the quantitative
- formula (including excipients) per unit dose (using International Nonproprietary Names (INNs)
- or national generic names where they exist), the shelf life and storage conditions, and packaging
- 253 characteristics. It specifies the information on which authorization is based (e.g. "The
- 254 product(s) must conform to all the details provided in your application and as modified in
- subsequent correspondence"). It also contains the product information approved for health
- 256 professionals and the public, the sales category, the name and address of the holder of the
- 257 authorization and the period of validity of the authorization. Once a product has been given
- 258 marketing authorization, it is included on a list of authorized products the register and is often
- said to be "registered" or to "have registration". Market authorization may occasionally also
- be referred to as a "licence" or "product licence".

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material 265 A general term used to denote starting materials (active pharmaceutical ingredients 266 and excipients), reagents, solvents, process aids, intermediates, packaging materials 267 and labelling materials. 268 269 packaging material 270 Any material, including printed material, employed in the packaging of a 271 pharmaceutical product, but excluding any outer packaging used for transportation or 272 shipment. Packaging materials are referred to as primary or secondary according to 273 whether or not they are intended to be in direct contact with the product. 274 275 276 pedigree 277 A complete record that traces the ownership of and transactions relating to a pharmaceutical 278 product as it is distributed through the supply chain. 279 pharmaceutical product 280 Any product intended for human use, or veterinary product intended for administration to food-281 282 producing animals, presented in its finished dosage form, which is subject to control by pharmaceutical legislation in either the exporting or the importing state and includes products 283 284 for which a prescription is required, products which may be sold to patients without a prescription, biologicals and vaccines. It does not, however, include medical devices. 285 286 product recall 287 A process for withdrawing or removing a pharmaceutical product from the pharmaceutical 288 distribution chain because of defects in the product, complaints of serious adverse reactions 289 to the product and/or concerns that the product is or may be counterfeit. The recall might be 290 291 initiated by the manufacturer, importer, wholesaler, distributor or a responsible agency. 292 production 293 All operations involved in the preparation of a pharmaceutical product, from receipt of 294 materials through processing, packaging and repackaging, labelling and relabelling, to 295 completion of the finished product. 296

297 quality assurance A wide-ranging concept covering all matters that individually or collectively influence the 298 299 quality of a product. It is the totality of the arrangements made with the object of ensuring that 300 pharmaceutical products are of the quality required for their intended use. 301 302 quality risk management A systematic process for the assessment, control, communication and review of risks to the 303 quality of pharmaceutical products across the product life-cycle. 304 305 306 quality system An appropriate infrastructure, encompassing the organizational structure, procedures, 307 308 processes and resources and systematic actions necessary to ensure adequate confidence that a 309 product (or services) will satisfy given requirements for quality. 310 311 quarantine 312 The status of pharmaceutical products isolated physically or by other effective means while a decision is awaited on their release, rejection or reprocessing. 313 314 retest date 315 316 The date when a material should be re-examined to ensure that it is still suitable for 317 use. 318 319 sampling Operations designed to obtain a representative portion of a pharmaceutical product, based on 320 an appropriate statistical procedure, for a defined purpose, e.g. acceptance of consignments or 321 322 batch release. 323 shelf life 324 The period of time during which a pharmaceutical product, if stored correctly, is expected to 325 comply with the specification as determined by stability studies on a number of batches of the 326 product. The shelf life is used to establish the expiry date of each batch. 327 328

329 standard operating procedure (SOP) An authorized, written procedure giving instructions for performing operations not necessarily 330 specific to a given product but of a more general nature (e.g. equipment operation, maintenance 331 and cleaning, validation, cleaning of premises and environmental control, sampling and 332 333 inspection). 334 335 storage The storing of pharmaceutical products up to the point of use. 336 337 supplier 338 339 A person or entity engaged in the activity of providing products and/or services. 340 341 transit342 The period during which pharmaceutical products are in the process of being carried, conveyed, or transported across, over or through a passage or route to reach the destination. 343 344 vehicles 345 346 Trucks, vans, buses, minibuses, cars, trailers, aircraft, railway carriages, boats and other means which are used to convey pharmaceutical products 347 348 4. **GENERAL PRINCIPLES** 349 350 4.1. There should be collaboration between all parties, including governments, customs 351 agencies, law enforcement agencies, regulatory authorities, manufacturers, distributors and 352 entities responsible for the supply of medical products to patients, to ensure the quality and 353 safety of these products; to prevent the exposure of patients to substandard and falsified 354 products and to ensure that the integrity of the distribution chain is maintained. 355 356 4.2. The principles of GSP and GDP should be included in national legislation and 357 guidelines for the storage and distribution of medical products, in a country or region as 358 applicable, as a means of establishing minimum standards. The principles of GSP and GDP are 359 360 applicable to:

361	•	products moving forward in the distribution chain from the manufacturer;	
362	•	products which are moving backwards in the chain, for example, as a result of the return	
363		or recall thereof; and	
364	•	donations of products.	
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366	5.	QUALITY MANAGEMENT	
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368	Qualit	y Systems	
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370	5.1.	Entities involved in the storage and distribution of medical products must have a	
371	compr	ehensively designed and correctly implemented, documented, quality system that	
372	incorp	orates good storage practices, good distribution practices, quality risk management and	
373	manag	ement review.	
374			
375	5.2.	Senior management has the ultimate responsibility to ensure an effective quality system	
376	is estal	blished, is adequately resourced, implemented and maintained. The effectiveness, roles,	
377	responsibilities and authorities should be defined, communicated and implemented throughout		
378	the organization.		
379			
380	5.3.	The quality system should ensure that:	
381			
382	•	GSP and GDP is adopted and managed through satisfactory arrangements to ensure, as	
383		far as possible, that the medical products are stored, distributed and subsequently	
384		handled so that quality is maintained throughout their shelf-life in the supply-chain;	
385	•	products are appropriately procured, stored, distributed and delivered to the right	
386		recipients;	
387	•	operations are clearly specified in a written procedures;	
388	•	responsibilities are clearly specified in job descriptions;	
389	•	all risks are identified and necessary, effective controls are implemented;	
390	•	processes are in place to assure the management of outsourced activities;	

there is a procedure for self-inspection and/or quality audit;

there is a system for quality risk management (QRM);

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393	•	there are systems for managing returns, complaints and recalls;
394	•	systems are in place to manage changes, deviations and corrective and preventive
395		actions (CAPAs).
396		
397	5.4.	There should be an authorized, written quality policy describing the overall intentions
398	and re	equirements regarding quality. This may be reflected in a quality manual.
399		
400	5.5.	There should be an appropriate organizational structure. This should be presented in
401	an au	thorized organizational chart. The responsibility, authority and interrelationships of all
402	perso	nnel should be clearly indicated.
403		
404	5.6.	Duties and responsibilities should be clearly defined and understood by the individuals
405	conce	erned and recorded as written job descriptions.
406		
407	5.7.	The quality system should include appropriate procedures, processes and resources.
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409	6.	QUALITY RISK MANAGEMENT
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411	6.1.	There should be a system to assess, control, communicate and review risks identified at all
412		s in the supply chain. The evaluation of the risk should be based on scientific knowledge and
413	exper	ience with the process and ultimately linked to the protection of the patient.
414	<i>-</i> - 2	
415	6.2.	Appropriate controls should be developed and implemented to address any risks identified.
416	I ne e	effectiveness of the controls implemented should be evaluated at periodic intervals.
417	(E on)	further reading and also WHO Crideline on Birk Management and ICH OO ISO 21000)
418 419	(FOT)	further reading, see also WHO Guideline on Risk Management and ICH Q9, ISO 31000).
	7.	MANAGEMENT REVIEW
420 421	/•	
T41		
122	7 1	There should be a system for periodic management review. The review should include:
422 423	7.1.	There should be a system for periodic management review. The review should include:
422 423 424	7.1.	There should be a system for periodic management review. The review should include: senior management;

425	•	review of the quality system and its effectiveness by using quality metrics and key	
426	performance indicators;		
427	•	identification of opportunities for continual improvement; and	
428	•	follow-up on recommendations from previous management review meetings.	
429			
430	7.2.	Records should be maintained.	
431			
432	8.	COMPLAINTS	
433			
434	8.1.	There should be a written procedure for the handling of complaints. A distinction should	
435	be mad	le between complaints about a product or its packaging and those relating to distribution.	
436	In the	case of a complaint about the quality of a product or its packaging, the original manufacturer	
437	and/or	marketing authorization holder should be informed as soon as possible.	
438			
439	8.2.	All complaints should be recorded and appropriately investigated. The root cause	
440	should be identified and the impact (e.g. on other batches or products) and risk assessed.		
441	Appropriate CAPA should be taken.		
442			
443	8.3.	Where required, the national regulatory authority should be informed and a recall	
444	initiated where appropriate.		
445			
446	8.4.	The relevant information, such as the results of the investigation of the complaint,	
447	should	be shared with the relevant parties.	
448			
449	8.5.	Product quality problems or suspected cases of substandard or falsified products are	
450	identif	ied and these should be handled according to the relevant procedures. The information	
451	should be shared with the appropriate national and/or regional regulatory authorities.		

9. RETURNED GOODS

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9.1. Returned medical products should be handled in accordance with authorizedprocedures.

457	9.2.	All returned goods should be placed in quarantine upon receiving. The status of
458	the go	ods should be clear. Precautions should be taken to prevent access and distribution until
459	a deci	sion has been taken with regard to their disposition. The particular storage conditions
460	applic	able to the products should be maintained.
461		
462	9.3.	When handling returned goods, at least the following considerations should be
463	taken	:
464		
465	•	A risk-based process should be followed when deciding on the fate of the
466		returned goods. This should include, but not be limited to, the nature of the
467		product, storage conditions, condition of the product history, time-lapse since
468		distribution, manner and condition of transport while being returned;
469	•	the terms and conditions of the agreement between the parties; and
470	•	examination of the returned goods, with decisions taken by suitably qualified,
471		experienced and authorized persons.
472		
473	9.4.	Where products are rejected, authorized procedures should be followed, including safe
474	transp	ort.
475		
476	9.5.	Destruction of products should be done in accordance with international, national and
477	local	requirements regarding disposal of such products and with due consideration to the
478	protec	tion of the environment.
479		
480	9.6.	Records of all returned, rejected and destroyed medical products should be kept for a
481	define	d period.
482		
483	10.	RECALLS
484		
485	10.1.	There should be a written procedure to effectively and promptly recall medical products
486	in cor	inpliance with national or regional requirements. A designated person(s) should be
487	respor	nsible for recalls.

- 10.2. The effectiveness of the procedure should be checked annually and updated as necessary.
- 492 10.3. The original manufacturer and/or marketing authorization holder, or other relevant contract party, should be informed in the event of a recall.
- 10.4. Information on a recall should be shared with the appropriate national or regional regulatory authority.
- 10.5. All recalled products should be transported and stored in secure, segregated conditions and clearly labelled as recalled products. The particular storage conditions applicable to the product should be maintained.
- 502 10.6. All customers and competent authorities of all countries to which a given product may 503 have been distributed should be informed promptly of the recall of the product.
- 10.7. All records, including distribution records, should be readily accessible to the designated person(s) responsible for recalls. These records should contain sufficient information on products supplied to customers (e.g. name, address, contact detail, batch numbers, quantities, safety features including exported products).
- 510 10.8. The progress of a recall process should be recorded and a final report issued which 511 includes a reconciliation between delivered and recovered quantities of products.

513 11. SELF-INSPECTION

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- 515 11.1. The quality system should include self-inspections. These should be conducted to 516 monitor implementation and compliance with the principles of regulations, GSP, GDP and 517 other appropriate guidelines.
- 519 11.2. Self-inspections should be conducted periodically according to an annual schedule.

551

552

The team conducting the inspection should be free from bias and individual members should 521 have appropriate knowledge and experience. Audits by independent third parties may be beneficial. 522 523 The results of all self-inspections should be recorded. Reports should contain all 524 11.4. 525 observations made during the inspection and presented to the relevant personnel as well as 526 management. 527 11.5. Necessary CAPAs should be taken and the effectiveness of the CAPAs should be 528 529 reviewed. 530 531 **12. PREMISES** 532 533 General 534 12.1. Premises should be suitably located, designed, constructed and maintained to ensure 535 appropriate operations such as receiving, storage, picking, packing and dispatch of medical 536 products. 537 538 There should be sufficient space, lighting and ventilation to ensure required 539 540 segregation, appropriate storage conditions and cleanliness. 541 542 12.3. Sufficient security should be provided and access should be controlled. 543 12.4. Appropriate controls and segregation should be provided for products requiring specific 544 handling or storage such as radio-active materials, products containing hazardous substances, 545 546 and products to be stored under controlled temperature and relative humidity conditions. 547 12.5. Receiving and dispatch bays should be separate and should protect products from 548 549 weather conditions.

12.6. Activities relating to receiving and dispatch such be done in accordance with authorized

procedures. Areas should be suitably equipped for the operations.

- 553 12.7. Premises should be kept clean. Cleaning equipment and cleaning agents should not
- become possible sources of contamination.

- 556 12.8. Premises should be protected from the entry of birds, rodents, insects and other animals.
- A rodent and pest control programme should be in place.

558

- 559 12.9. Toilets, wash, rest and canteen facilities should be separate from other areas. Food,
- eating, drinking, and smoking should be prohibited in all areas where medical products are
- stored or handled.
- 562 Receiving

563

- 564 12.10. Each incoming delivery should be checked against the relevant documentation
- to ensure that the correct product is delivered from the correct supplier. This may
- include, e.g. the purchase order, each container, label description, batch number,
- 567 product and quantity.

568

- 569 12.11. The consignment should be examined for uniformity of the containers and, if
- 570 necessary, should be subdivided according to the supplier's batch number should the
- delivery comprise more than one batch. Each batch should be dealt with separately.

572

- 573 12.12. Each container should be carefully checked for possible contamination,
- 574 tampering and damage. Any suspect containers or, if necessary, the entire delivery
- should be quarantined for further investigation.

576

- 577 12.13. Receiving areas should be of sufficient size to allow cleaning of incoming
- 578 containers.

579

- 580 12.14. When required, samples should be taken only by appropriately trained and
- qualified personnel and in strict accordance with written sampling procedure and
- sampling plans. Containers from which samples have been taken should be labelled
- 583 accordingly.

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- 12.15. Following sampling, the goods should be subject to quarantine. Batch 585 segregation should be maintained during quarantine and all subsequent storage. 586 587 12.16. Materials and products requiring storage under controlled conditions of 588 temperature and relative humidity should be handled as a priority. 589 590 591 12.17. Materials and products should remain in quarantine until an authorized release 592 or rejection is obtained. 593 12.18. Measures should be taken to ensure that rejected materials and products cannot 594 595 be used. They should be stored separately from other materials and products while 596 awaiting destruction or return to the supplier. 597 598 Storage areas 599 600 12.19. Precautions should be taken to prevent unauthorized persons from entering 601 storage areas. 602 12.20. Storage areas should be of sufficient capacity to allow the orderly storage of 603 604 the various categories of materials and products, such as starting and packaging
- materials, intermediates, finished products, products in quarantine, and released, 605 rejected, returned or recalled products. 606
- 12.21. Storage areas should be appropriately designed, constructed, maintained or 608 adapted. They should be kept clean and dry and there should be sufficient space and 609 610 lighting.
- 12.22. Storage areas should be maintained within acceptable temperature limits. 612 Where special storage conditions are required on the label (e.g. temperature, relative 613

humidity), these should be provided, controlled, monitored and recorded. 614

- 616 12.23. Materials and products should be stored off the floor and suitably spaced to
- permit ventilation, cleaning and inspection. Suitable pallets should be used and kept
- in a good state of cleanliness and repair.

- 620 12.24. A written sanitation programme should be available indicating the frequency
- of cleaning and the methods to be used to clean the premises and storage areas.

622

- 623 12.25. There should be a written programme for pest control. The pest-control agents
- used should be safe and there should be no risk of contamination of the materials and
- 625 products.

626

- 627 12.26. There should be appropriate procedures for the clean-up of any spillage to
- ensure complete removal of any risk of contamination.

629

- 630 12.27. Where the status is ensured by storage in separate areas, these areas must be
- 631 clearly marked and their access restricted to authorized personnel. Any system
- replacing physical separation and labelling or demarcation should provide equivalent
- 633 security. For example, computerized systems can be used provided that they are
- validated to demonstrate security of access.

635

- 636 12.28. Where required, a separate sampling area should be in place. If sampling is
- performed in the storage area, it should be conducted in such a way that there is no
- risk of contamination or cross-contamination. Adequate cleaning procedures should
- be in place for the sampling areas.

640

- 641 12.29. Certain materials and products such as highly active and radioactive materials,
- narcotics and other hazardous, sensitive and/or dangerous materials and products, as
- well as substances presenting special risks of abuse, fire or explosion (e.g. combustible
- liquids and solids and pressurized gases), should be stored in a dedicated area that is
- subject to appropriate additional safety and security measures.

- 647 12.30. Materials and products should be handled and stored in such a manner as to
- prevent contamination, mix-ups and cross-contamination.

- 650 12.31. Materials and products should be stored in conditions which assure that their
- quality is maintained and stock should be appropriately rotated. The "first expired/first"
- out" (FEFO) principle should be followed.

653

- 654 12.32. Rejected materials and products should be identified and controlled under a
- quarantine system designed to prevent their use until a final decision is taken on their
- 656 fate.

657

- 658 12.33. Narcotic products should be stored in compliance with international
- conventions, and national laws and regulations on narcotics.

660

- 661 12.34. Broken or damaged items should be withdrawn from usable stock and
- separated.

663

- 664 12.35. There should be appropriate procedures for the clean-up of any spillage to ensure
- complete removal of any risk of contamination.

666

667 Storage conditions

668

- 669 12.36. The storage conditions for materials and medical products should be in
- compliance with the labelling, which is based on the results of stability testing.

671

- 672 12.37. Heating, ventilation and air conditioning systems (HVAC) should be
- appropriately designed, installed, qualified and maintained to ensure that the required
- storage conditions are maintained.

- 676 12.38. Where required, mapping studies for temperature and relative humidity, as
- appropriate, should be done to show uniformity across the storage facility. (*Ref: WHO*
- 678 Technical Report Series No. 961, Annex 9, Model guidance for the storage and transport

of time- and temperature-sensitive pharmaceutical products). This applies, for example, to
 areas, refrigerators and freezers.

681

- 682 12.39. Temperature and relative humidity, as appropriate, should be controlled and
- 683 monitored at regular intervals. Data should be recorded and the records should be
- reviewed. The equipment used for monitoring should be calibrated and be suitable for
- their intended use. All records pertaining to mapping and monitoring should be kept
- for a suitable period of time and as required by national legislation.

687

- 688 12.40. Temperature and relative humidity, as appropriate, should be controlled and
- 689 monitored at regular intervals. Data should be recorded and the records should be
- 690 reviewed. The equipment used for monitoring should be calibrated and be suitable for
- 691 their intended use. All records pertaining to mapping and monitoring should be kept
- for a suitable period of time and as required by national legislation.

693

694 *Note: See annexure 1 for recommended storage conditions.*

695

696 13. STOCK CONTROL AND ROTATION

697

- 698 13.1. Periodic stock reconciliation should be performed at defined intervals by comparing
- the actual and recorded stocks.

700

- 701 13.2. The root cause for stock discrepancies should be identified and appropriate CAPAs
- taken to prevent recurrence.

703

- 704 13.3. Damaged containers should not be issued unless the quality of the material
- has been shown to be unaffected. Where possible, this should be brought to the
- 706 attention of the person responsible for quality. Any action taken should be
- 707 documented.

- 709 13.4. All stocks should be checked regularly for obsolete, to be retested, and
- 710 expired materials and products.

711 **14. EQUIPMENT**

712

- 713 14.1. Equipment, including computerized systems should be suitable for their intended
- 714 use. These should be appropriately designed, located, installed, qualified and maintained.

715

716 14.2. Computerized systems should be capable of achieving the desired output and results.

717

- 718 14.3. Where electronic commerce (e-commerce) is used, i.e. electronic means are used for
- any of the steps, defined procedures and adequate systems should be in place to ensure
- 720 traceability and confidence in the supply chain and products concerned.

721

- 722 14.4. Electronic transactions (including those conducted via the Internet) relating to the
- distribution of medical products should be performed only by authorized persons according
- to defined and authorized access and privileges.

725

- 726 14.5. Where GXP systems are used, these should meet the requirements of 21 CFR 211
- Part 11, EU chapter 11 and WHO guidelines on computerized systems.

728

- 729 14.6. Data should meet ALCOA principles. Procedures should be followed, and records
- maintained for the back-up and restoration of data.

731

732 15. QUALIFICATION AND VALIDATION

733

- 734 15.1. The scope and extent of qualification and validation should be determined
- using a documented risk assessment approach.

736

- 737 15.2. Premises, utilities, equipment and instruments, processes and procedures
- should be considered. The scope and extent of qualification and validation in case of
- any significant changes should be identified.

- 741 15.3. Qualification and validation should be done following procedures and
- 742 protocols. The results and outcome of the qualification and validation should be

- recorded in reports. Deviations should be investigated and the completion of the qualification and validation should be concluded and approved by responsible
- 745 personnel.

747 **16. PERSONNEL**

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749 16.1. There should be an adequate number of personnel.

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- 751 16.2. Personnel should have appropriate educational qualification, experience and training
- 752 relative to the activities undertaken.

753

- 754 16.3. Personnel should have the authority and resources needed to carry out their duties and
- to follow the quality systems, as well as to identify and correct deviations from the established
- 756 procedures.

757

- 758 16.4. There should be arrangements in place to ensure that management and personnel are
- not subject to commercial, political, financial and other pressures or conflict of interest that
- 760 may have an adverse effect on the quality of service provided or on the integrity of
- 761 pharmaceutical products.

762

- 16.5. Safety procedures relating to all relevant aspects including the safety of personnel and
- property, environmental protection and product integrity, should be in place.

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- 766 16.6. Personnel should receive initial and continued training in accordance with a written
- training programme. The training should cover the requirements of GSP, GDP (as applicable),
- as well as on-the-job training. Other topics may include product security, product identification,
- 769 the detection of falsified products.

- 771 16.7. Personnel dealing with hazardous pharmaceutical products (such as highly active
- materials, radioactive materials, narcotics, and other hazardous, environmentally sensitive
- and/or dangerous pharmaceutical products, as well as products presenting special risks of
- abuse, fire or explosion) should be given specific training.

- 16.8. Personnel should be trained in, and observe high levels of, personal hygiene
 and sanitation.
- 778 16.9. Records of all training, attendance and assessment should be kept.
- 16.10. Personnel handling products should wear garments suitable for the activities that they perform. Personnel dealing with hazardous pharmaceutical products, including products containing materials that are highly active, toxic, infectious or sensitizing, should be provided
- 783 with protective garments as necessary.

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- 16.11. Appropriate procedures relating to personnel hygiene, relevant to the activities to be carried out, should be established and observed. Such procedures should cover health, hygiene and clothing of personnel.
- 16.12. Procedures and conditions of employment for employees, including contract and temporary staff, and other personnel having access to medical products, must be designed and administered to assist in minimizing the possibility of such products coming into the possession of unauthorized persons or entities.
- 16.13. Codes of practice and punitive procedures should be in place to prevent and address situations where persons involved in the storage and distribution of medical products are suspected of, or found to be implicated in, any activities relating to the misappropriation, tampering, diversion or falsifying of any product.

799 **17. DOCUMENTATION**

17.1. Documentation includes all procedures and records, whether in paper or electronic form. Documents should be appropriately designed, completed, reviewed, authorized, distributed and kept as required. Documents should be readily available.

805	17.2. Written procedures should be followed for the preparation, review, approval, use of and
806	control of all documents relating to the policies and activities for storage and distribution of
807	medical products process.
808	
809	17.3. Documents should be laid out in an orderly fashion and be easy to complete, review
810	and check. The title, scope, objective and purpose of each document should be clear.
811	
812	17.4. The contents of documents should be accurate, legible, traceable, attributable and
813	unambiguous.
814	
815	17.5. All documents should be completed, signed and dated as required by authorized
816	person(s) and should not be changed without the necessary authorization.
817	
818	17.6. Documentation should be prepared and maintained in accordance with the national
819	legislation and principles of good documentation practices (see WHO Technical Report
820	Series No. 996, Annex 5, Guidance on good data and record management practices).
821	
822	17.7. The distributor must establish and maintain procedures for the identification
823	collection, indexing, retrieval, storage, maintenance, disposal of and access to all applicable
824	documentation.

17.8. Documents should be reviewed regularly and kept up-to-date. When a document has been revised, a system should exist to prevent inadvertent use of the superseded version.

828

829 17.9. All records must be readily retrievable and be stored and retained using facilities that are safeguarded against unauthorized access, modification, damage, deterioration and/or loss of documentation.

832

833 17.10. Records should contain at least the following information:

834

835 • date;

836 • name of the product;

867

837	•	quantity received, or supplied; and
838	•	name and address of the supplier.
839		
840	17.11.	Comprehensive records should be maintained for all receipts, materials and
841	produc	ts stored, and issues or distribution. They should include, for example, the
842	descrip	tion of the goods, quantity, names and addresses (such supplier, customer),
843	batch n	number(s), date of receipt/dispatch and expiry date.
844		
845	17.12.	All containers should be clearly labelled with at least the name of the
846	materia	al/product, the batch number, the expiry date or retest date, and the specified
847	storage	conditions. Unauthorized abbreviations, names or codes should not be used.
848		
849	18.	ACTIVITIES AND OPERATIONS
850		
851	18.1.	All activities and operations relating to procurement, storage and distribution of
852	medical	products should be conducted in accordance with national legislation, GSP, GDP and
853	associat	ted guidelines.
854		
855	18.2.	Storage and distribution of medical products should be done by persons so authorized,
856	in accor	dance with national legislation.
857		
858	18.3.	Activities and operations should be performed in accordance with documented
859	procedu	ires.
860		
861	Receivi	ng
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863	18.4.	Materials and products should be procured from appropriately authorized suppliers.
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865	18.5.	Deliveries should be examined for damage, seal intactness, signs of tampering,

labelling, completeness of order and other related aspects, at receipt.

- 18.6. Containers and consignments not meeting acceptance criteria for receiving should be separated, quarantined and investigated. This includes suspected falsified products.

 18.7. Materials and products requiring specific storage conditions, or access control (e.g. narcotics) should be processed without delay and stored in accordance with their requirements.
- 874 Storage

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- 876 18.8. There should be sufficient space for the safe and secure storage of medical products (see section xxx above).
- 879 18.9. Appropriate controls should be implemented to prevent contamination and/or mix ups 880 during storage.
- 882 18.10. Storage areas should be clean and kept free from litter, birds, dust and pests.
- 884 18.11. Controls and procedures should be in place to prevent and handle spillage and breakage.
- 18.12. Materials and products should be stored under the conditions specified on the label, e.g. controlled temperature and relative humidity when necessary. When specific storage conditions are required, the storage area should be qualified and operated within the specified limits. The storage conditions should be monitored and records maintained. The records should be reviewed and trends and out of limit results investigated.
- 893 18.13. Stock should be rotated and the FEFO policy should be implemented.
- 895 18.14. Computerized systems used for stock management should be validated.
- 18.15. Materials and products reaching their expiry date should be separated from usable stock and not be supplied.

900	Repacka	aging and relabelling
901		
902	18.16.	Repackaging and relabelling of materials and products are not recommended. Where
903	they do	occur, they should only be performed by entities appropriately authorized to do so and
904	in comp	bliance with the applicable national, regional and international requirements, and in
905	accorda	nce with GMP.
906		
907	18.17.	Procedures should be in place for the controlled disposal of original packaging to
908	prevent	re-use.
909		
910	Distribi	ation and transport
911		
912	18.18.	Materials and products should be transported in accordance with the conditions stated
913	on the la	abels. There should be no risk to the quality of the material or product during transport
914	and dist	ribution.
915		
916	18.19.	Product, batch and container identity should be maintained at all times.
917		
918	18.20.	All labels should remain legible.
919		
920	18.21.	Distribution records should be sufficiently detailed to allow for a recall when required.
921		
922	18.22.	A copy of the original certificate of analysis from the manufacturer should be provided
923	to the cu	astomer.
924		
925	18.23.	Drivers of vehicles should be identified and present appropriate documentation to
926	demons	trate that they are authorized to transport medical products.
927		
928	18.24.	Vehicles should be suitable for their purpose, with sufficient space and appropriately
929	equippe	d to protect materials and products.
930		

- 18.25. The design and use of vehicles and equipment must aim to minimize the risk of errors and permit effective cleaning and/or maintenance to avoid contamination, build-up of dust or dirt and/or any adverse effect on the quality of the products.

 18.26. Where feesible, consideration should be given to adding technology, such as global
- 935 18.26. Where feasible, consideration should be given to adding technology, such as global positioning system (GPS) electronic tracking devices and engine-kill buttons to vehicles, which would enhance the security and traceability of vehicles with products.

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- 939 18.27. Where possible, dedicated vehicles and equipment should be used for medical products. Where non-dedicated vehicles and equipment are used, procedures should be in place to ensure that the quality of the products will not be compromised. Defective vehicles and equipment should not be used. These should either be labelled as such or removed from service.
- 18.28. There should be procedures in place for the operation and maintenance of all vehiclesand equipment.
- 18.29. There should be written programmes and records for cleaning and pest control.
 Records should be kept. The cleaning and fumigation agents used should not have any adverse
 effect on product quality.
- 952 18.30. Equipment chosen and used for the cleaning of vehicles should not constitute a source 953 of contamination. Agents used for the cleaning of vehicles should be approved by 954 management.
- 18.31. Appropriate environmental conditions should be provided, checked, monitored and recorded. All monitoring records should be kept for a minimum of the shelf life of the product distributed plus one year, or longer, if required by national legislation. Records of monitoring data should be made available for inspection by the regulatory or other oversight body.
- 18.32. Instruments used for monitoring conditions, e.g. temperature and humidity, within vehicles and containers should be calibrated at regular intervals.

symbols as appropriate.

18.33. Where possible, mechanisms should be available to allow for the segregation during 963 transit of rejected, recalled and returned products as well as those suspected as falsified. Such 964 965 goods should be securely packaged, clearly labelled and be accompanied by appropriate 966 supporting documentation. 967 18.34. Measures should be in place to prevent unauthorized persons from entering and/or 968 969 tampering with vehicles and/or equipment, as well as to prevent the theft or misappropriation thereof. 970 971 Shipment containers should have no adverse effect on the quality of the products and 972 973 should offer adequate protection to materials and products. Containers should be labelled

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977 18.36. Special care should be taken when using dry ice in shipment containers due to safety 978 issues and possible adverse effects on the quality of products.

indicating, e.g. handling and storage conditions, precautions, contents and source, safety

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980 18.37. Written procedures should be available for the handling of damaged and/or broken 981 shipment containers. Particular attention should be paid to those containing potentially toxic 982 and hazardous products.

983

984 Dispatch

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18.38. Products should only be sold and/or distributed to persons or entities that are authorized to acquire such products in accordance with the applicable national legislation.
Written proof of such authorization must be obtained prior to the distribution of products to such persons or entities.

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991 18.39. Dispatch and transportation should be undertaken only after the receipt of a valid order which should be documented.

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18.40. There should be documented, detailed procedures for the dispatch of products.

18.41. Records for the dispatch of products should be prepared and should include information such as, but not limited to, date of dispatch; complete business name and address (no acronyms), type of entity responsible for the transportation, telephone number, names of contact persons; status of the addressee (e.g. retail pharmacy, hospital or community clinic); a description of the products including, e.g. name, dosage form and strength (if applicable); quantity of the products, i.e. number of containers and quantity per container (if applicable); applicable transport and storage conditions; a unique number to allow identification of the delivery order; and assigned batch number and expiry date (where not possible at dispatch, this information should at least be kept at receipt to facilitate traceability).

18.42. Records of dispatch should contain enough information to enable traceability of the product. Such records should facilitate the recall of a batch of a product, if necessary, as well as the investigation of falsified or potentially falsified products. In addition, the assigned batch number and expiry date of pharmaceutical products should be recorded at the point of receipt to facilitate traceability.

18.43. Vehicles and containers should be loaded carefully and systematically, where applicable on a first-out/last-in basis, to save time when unloading, prevent physical damage and reduce security risks. Extra care should be taken during loading and unloading of cartons to avoid damage.

18.44. Products should not be supplied or received after their expiry date, or so close to the expiry date that this date is likely to be reached before the products are used by the consumer.

18.45. Products and shipment containers should be secured to prevent or provide evidence of unauthorized access. Vehicles and operators should be provided with additional security, as appropriate, to prevent theft and other misappropriation of products during transportation.

1023 18.46. Products should be stored and transported in accordance with procedures such that:

- the identity of the product is not lost;
- the product does not contaminate and is not contaminated by other products;

1027 adequate precautions are taken against spillage, breakage, misappropriation and theft; and 1028 1029 appropriate environmental conditions are maintained, e.g. using cold chain for thermolabile products. 1030 1031 18.47. Written procedures should be in place for investigating and dealing with any failure 1032 1033 to comply with storage requirements, e.g. temperature deviations. If a deviation has been noticed during transportation by the person or entity responsible for transportation, this should 1034 1035 be reported to the distributor and recipient. In cases where the recipient notices the deviation, 1036 it should be reported to the distributor. 1037 1038 Transportation of products containing hazardous substances, or narcotics and other 1039 dependence-producing substances, should be transported in safe, suitably designed, secured 1040 containers and vehicles. In addition, the requirements of applicable international agreements 1041 and national legislation should be met. 1042 Spillages should be cleaned up as soon as possible to prevent possible contamination, 1043 18.49. 1044 cross-contamination and hazards. Written procedures should be in place for the handling of 1045 such occurrences. 1046 1047 Damage to containers and any other event or problem that occurs during transit must 1048 be recorded and reported to the relevant department, entity or authority, and investigated. 1049 Products in transit must be accompanied by the appropriate documentation. 1050 18.51. 1051 **19. OUTSOURCED ACTIVITIES** 1052 1053 1054 19.1. Any activity relating to the storage and distribution of a medical product which is 1055 delegated to another person or entity should be performed by parties appropriately authorized, 1056 in accordance with national legislation, and the terms of a written contract. 1057

- 19.2. There should be a written contract between the parties. The contract should define the responsibilities of each party (contract giver and contract acceptor) and at least the following:

 1060

 compliance with this guideline and the principles of GSP and GDP;

 1062
 relevant warranty clauses;

 1063
 responsibilities of the contractor for measures to avoid the entry of substandard and
- falsified products into the distribution chain;
- training of personnel;
- conditions of subcontracting subject to the written approval of the contract giver; and
- 1067 periodic audits.

1069 19.3. The contract giver should assess the competence of the contract acceptor before entering into an agreement.

1071

1072 19.4. The contract giver should provide all relevant information relating to the material/products to the contract acceptor.

1074

1075 19.5. The contract acceptor should have adequate resources (e.g. premises, equipment, personnel, knowledge, experience, vehicles as appropriate) to carry out the work.

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1078 19.6. The contract acceptor should refrain from performing any activity that may adversely affect the materials or products handled.

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20. SUBSTANDARD AND FALSIFIED PRODUCTS

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1083 20.1. The quality system should include procedures to assist in identifying and handling materials and products that are suspected to be substandard and or falsified.

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1086 20.2. Where these materials and products are identified, the holder of the marketing authorization, the manufacturer and the appropriate national and/or international regulatory bodies, as well as other relevant competent authorities, should be informed.

guidelines (GxP) as appropriate.

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- 1090 20.3. Such products should be stored in a secure, segregated area and clearly identified to prevent further distribution or sale. Access should be controlled. 1091 1092 20.4. Records should be maintained reflecting the investigations and action taken, such as 1093 1094 disposal of the material or products. Falsified materials and products should not re-enter the 1095 market. 1096 21. INSPECTION OF STORAGE AND DISTRIBUTION FACILITIES 1097 1098 1099 21.1. Storage and distribution facilities should be inspected by inspectors so authorized in 1100 terms of national legislation. This should be done at determined periodic intervals. 1101 1102 21.2. Inspectors should have appropriate educational qualifications, knowledge and 1103 experience. 1104 1105 21.3. An inspection should normally be conducted by a team of inspectors. 1106 1107 21.4. Inspectors should assess compliance with national legislation, GSP, GDP and related
- 21.5. Inspections should cover the premises, equipment, personnel, activities, quality system, qualification and validation, and other related aspects as contained in this guideline.
- 21.6. An inspection report should be prepared and provided to the inspected entity within 30 days from the last day of the inspection. Observations may be categorized based on risk assessment.
- 21.7. CAPA for observations listed as non-compliances in the inspection report, with the national legislation and guidelines, should be submitted for review by the inspectors within the defined period as stated by the inspectors.
- 1121 21.8. Inspections should be closed with a conclusion after the review of the CAPAs.

1122	References and further reading
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1124	[Note from Secretariat: the references included in the text will be added here in the final
1125	version. Proposals for further reading references are invited.]
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ANNEXURE 1. RECOMMENDED STORAGE CONDITIONS

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Note: Appropriate conditions should be provided for materials and products during storage and distribution. Conditions should be maintained as stated on their labels from the manufacturers and suppliers, during storage and distribution. Where possible, actual limits should be provided by the manufacturers, such as "store below 25°C". Vague statements such as "store at ambient conditions" should be avoided.

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Table 1. Recommended limits for descriptive storage conditions¹

Label description	Recommended limits
Store at controlled room temperature	20 to 25°C
Store in a cool place	8 to 15°C
Store in a refrigerator	2 to 8°C
Store in a freezer	-25 to -10°C
Store in a dry place	No more than 60% relative humidity
Protect from moisture	No more than 60% relative humidity
Store under ambient conditions	Storage in dry, well-ventilated premises at
	temperatures of 15 –30°C. Extraneous odours,
	other indications of contamination, and intense
	light must be excluded.
Do not store over 30°C	2 to 30°C
Do not store over 25°C	2 to 25°C
Do not store over 15°C	2 to 15°C
Do not store over 8°C	2 to 8°C
Do not store below 8°C	8 to 25°C
Protect from light	To be provided in light resistant containers.
	Light level not exceeding 300 lux.
Chilled	Refrigerated

¹These limits are recommended values, based on pharmacopoeia limits and guidelines

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