# GMP主題論壇課程-GMP法規更新與解析

第三章 廠房設施與設備 & 第五章 生產

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附件:西藥藥品優良製造規範(第一部)草案1份



主旨:預告修正「西藥藥品優良製造規範(第一部)」部分規

定草案。

依據:藥物優良製造準則第三條。

### 四、修正內容摘要如下:

- (一)第三章廠房設施與設備:
  - 1、所有產品應有依風險等級管制之交叉汙染防止。
  - 2、毒理學評估藥品相關製造設備之殘留限量。

### (二)第五章生產:

- 生產中之交叉汙染防止分為技術措施(硬體)與組織措施(軟體)。
- 2、原料藥應建立供應鏈之可追溯性,且應對於原料藥 之製造廠及運銷商進行稽核。

## (三)第八章申訴與產品回收:

- 1、導入風險管理原則整章修正。
- 2、詳述申訴與品質缺陷的處理、評估、調查及檢討。

### Presentation summary

- 1. 第三章 廠房設施與設備 廠房設施---生產區(3.6)
- 2. 第五章 生產
- 2.1生產中交叉污染的防止(5.17, 5.18, 5.19, 5.20, 5.21)
- 2.2 PI 046-1--- GUIDELINE ON SETTING HEALTH BASED EXPOSURE LIMITS FOR USE IN RISK IDENTIFICATION IN THE MANUFACTURE OF DIFFERENT MEDICINAL PRODUCTS IN SHARED FACILITIES
- 2.3 原料(5.27, 5.28, 5.29, 5.30, 5.34, 5.35, 5.36)
- 2.4 PI 045-1 --- GUIDELINES ON THE FORMALISED RISK ASSESSMENT FOR ASCERTAINING THE APPROPRIATE GOOD MANUFACTURING PRACTICE FOR EXCIPIENTS OF MEDICINAL PRODUCTS FOR HUMAN USE
- 2.5因製造限制造成產品短缺(5.71)

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## 第三章 廠房設施設備 --- 原規定

### 生產區

#### 3.6

- 1.為使因<u>交叉污染</u>所引起之嚴重醫療傷害的風險降到最低,對於一些特殊藥品的生產,例如高致敏性物質(例如:<u>青黴素類</u>)或生物性製劑(例如:來自活的微生物),應有專用且自足圍堵的設施;
- 2.某些抗生素、某些荷爾蒙、某些細胞毒類、某些高活性藥物及非藥品 的生產<u>不得在同一設施中為之</u>。
- 3.如採取特別的預防措施,並執行必要的確效時,在例外的情形下, 可以接受在同一設施中的時段切換生產(campaign working)原則。
- 4.工業毒物諸如殺蟲劑及除草劑,不得於藥品之廠房設施中製造。

# 第三章 廠房設施設備

	Section 3.6			
PIC/S	為使因交叉污染所引起之嚴重醫療傷害的風險降到最低,對於一些特			
GMP PE 009-13 (Part I) 1 Jan. 2017	殊藥品的生產,例如高致敏性物質(例如:青黴素類)或生物性製劑			
	(例如:來自活的微生物),應有專用且自足圍堵的設施;尚有一些			
1 3011. 2017	產品,例如某些抗生素、某些荷爾蒙、某些細胞毒類、某些高活性藥			
	物及非藥品的生產不得在同一設施中為之。如採取特別的預防措施,			
	並執行必要的確效時,在例外的情形下,可以接受在同一設施中的時			
	段切換生產原則。工業毒物諸如殺蟲劑及除草劑,不得於藥品之廠房			
	設施中製造。			
PE 009-14	所有產品應經由製造設施之適當設計與操作防止交叉污染。			
PE 003-14	防止交叉污染的措施應與風險相稱。品質風險管理原則應			
	使用於評估及管制風險。			
	取決於風險等級,可能需要於專用的廠房設施與設備執行			
	製造及/或分/包裝作業,以管制有些藥品所呈現之風險。			

# 第三章 廠房設施設備

	Section 3.6			
PIC/S	為使因交叉污染所引起之嚴重醫療傷害的風險降到最低,對於一些特殊藥品的生產,例如高致敏性物			
GMP	質(例如:青黴素類)或生物性製劑(例如:來自活的微生物),應有專用且自足圍堵的設施;尚有			
PE 009-13	一些產品,例如某些抗生素、某些荷爾蒙、某些細胞毒類、某些高活性藥物及非藥品的生產不得在同			
(Part I)	一設施中為之。如採取特別的預防措施,並執行必要的確效時,在例外的情形下,可以接受在同一設			
1 Jan. 2017	施中的時段切換生產原則。工業毒物諸如殺蟲劑及除草劑,不得於藥品之廠房設施中製造。			
PE 009-14	當藥品因為下列任一原因呈現風險時,對其製造需要專用			
	設施:			
	i. 風險不能經由操作及/或技術措施充分管制,			
	ii來自毒理學評估的科學數據無法支持可控制的風險(例如			
	來自高致敏物質的過敏潛在性,如β-內醯胺)或			
	iii 衍生自毒理學評估的相關殘留限量,無法經由經確效的			
	分析方法滿意測定。			
	進一步的指引詳見第五章與附則2、3、4、5及6。			

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- 2.5因製造限制造成產品短缺(5.71)

生產中交叉污染的防止

(5.17, 5.18, 5.19, 5.20, 5.21)

原規定 (PE 009-13)

5.17 通常,非藥品之生產應避免在預定生產藥品的區域與設備中為之。

### 改版後(PE 009-14)之規定

5.17 通常,非藥品之生產應避免在預定生產藥品的區域與設備中為之。但如適用時,可採取下文和第3章所述之防止藥品 交叉污染的措施。工業毒物,如殺蟲劑(除非用於製造藥品) 與除草劑之生產及/或儲存,不得出現於藥品生產及/或儲存 之區域。

#### 原規定 (PE 009-13)

5.18 應防止原料或產品被另一原物料或產品污染。該意外交叉污染的風險,源於製程中未管制之原物料及產品所產生的粉塵、氣體、蒸氣、噴霧或微生物、設備上的殘留物及因作業人員的服裝等。該風險的嚴重性隨污染物的種類及被污染的產品而異,其中最具危害的污染物是高致敏性物質、含有活體的生物製劑、某些荷爾蒙類、細胞毒類及其他高活性的物質。污染尤對以注射、大劑量及/或長期投用的產品之使用最具風險。

#### 改版後(PE 009-14)之規定

5.18應防止原料或產品被另一原物料或產品污染。該意外交叉污染的風險,源於製程中未管制之原料藥、其他原物料(起始或製程中)及產品所產生的粉塵、氣體、蒸氣、氣霧、基因材料或微生物、設備上的殘留物及因作業人員的服裝等,應被評估。該風險的嚴重性隨污染物的性質及被污染的產品而異,交叉污染尤對以注射及長期投用的產品之使用最具風險。但是,根據污染的性質與程度,所有產品的污染都會給患者的安全帶來風險.

### 改版後(PE 009-14)之新增加的規定

5.29 對於原料藥與賦形劑供應商的核准及維護,要求如下:

### 原料藥

應對於原料藥之<u>製造廠及運銷商</u>進行稽核,以確認其符合相關之優良製造規範(GMP)及優良運銷規範(GDP)要求。製造許可的持有者應自行或透過代表其履行合約的一方確認此符合性。

稽核應具適當之期間及範圍,以確保對GMP進行全面及明確的評估;應考慮到來自於現場其他原料之潛在交叉污染。報告應充分反映在稽核過程中所執行及所見的情況,並明確指出任何不足之處。任何需要的矯正預防行動應予執行。

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### 改版後(PE 009-14)之新增加的規定

5.19 交叉污染應按第三章所述,經由注意廠房設施與設備之設計予以防止。應該關注製程設計與任何相關**技術或組織之措施**的實施,包括有效且可再現的清潔程序,以控制交叉污染的風險。

#### 5.19之解說:

交叉污染應按第三章所述,經由注意<u>廠房設施與設備之設計</u> 予以防止。---請參考3.6

應該關注製程設計與任何相關技術或組織之措施的實施,包括有效且可再現的清潔程序,以控制交叉污染的風險。---請參考5.21

### 改版後(PE 009-14)之新增加的規定

5.20 品質風險管理過程(包括效價及毒理學評估)應加以使 用,以評估及管制由所製造之產品呈現的交叉污染風險。包 括的因素有設施/設備的設計與使用、人流及物流、微生物學 上的管制、原料藥之理化特性、製程特性及清潔程序,以及 由產品評估中所建立關於相關限量之分析能力,也應加以考 慮。品質風險管理過程的結果應成為確定哪些廠房設施與設 備應專用於特定產品或產品家族的必要性及程度之基礎。這 可能包括專用特定的產品接觸零件或整個生產設施。證明合 理時,在多產品共用設施內,將生產活動限制在隔離的、自 主圍堵的生產區域是可以接受的.

### 交叉污染應以適當的技術或有組織的措施避免之.

#### 原規定 (PE 009-13)

5.19 a.b.c.d.e.f.g---共7項規定



### 改版後(PE 009-14)之規定

5.21 共23項規定

技術措施 1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13 --- 共13項規定組織措施 1. 2. 3. 4. 5. 6. 7. 8. 9. 10. --- 共10項規定

### 交叉污染應以適當的技術或有組織的措施避免之:

### 原規定 (PE 009-13)

- 5.19 交叉污染應以適當的技術或有組織的措施避免之,例如:
- a) 在隔離的區域(對諸如青黴素類、活疫苗、活細菌製劑及一些 其他生物性製劑的產品所要求),或採分隔時段切換生產,其後 應緊接著適當的清潔處理;
- b) 備有適當的氣鎖室及空氣抽除設備;
- c) 將未經處理或未經充分處理的空氣之再循環或再進入所引起的污染風險降到最低;
- d) 製造具交叉污染特別風險之產品的區域內應保持穿著防護裝;
- e) 設備的無效清潔是交叉污染的普遍來源,故應使用已知有效的清潔及去污染程序;
- f) 使用密閉的生產系統;
- g) 檢驗設備上的殘留物並使用清潔狀態標籤。

交叉污染應以適當的技術或有組織的措施避免之

改版後(PE 009-14)之規定

5.21 共23項規定

技術措施 1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13 --- 共13項規定

組織措施 1.2.3.4.5.6.7.8.9.10. --- 共10項規定

### 改版後(PE 009-14)之規定

5.21 品質風險管理過程<u>的結果</u>應作為確定控制交叉污染風險 所需之技術及組織措施程度的基礎。這些可能包括但不侷限 於以下內容:

技術措施 (13項)

i 專用製造設施(廠房設施與設備);

ii 自足圍堵的生產區域,具有獨立的製造設備及獨立的空調 (HVAC)系統。將某些公用設施與其他區域之公用設施隔離開來也是可取的; (有關圍堵之補充,請看本講義後之參考文件1)

iii 製程、廠房設施與設備之設計,使<u>製程、維護及清潔期間</u> 中交叉污染的風險降到最低;

#### 改版後(PE 009-14)之規定

5.21 品質風險管理過程的結果應作為確定控制交叉污染風險 所需之技術及組織措施程度的基礎。這些可能包括但不侷限 於以下內容:

技術措施 (13項)

iv使用「密閉系統」操作及設備之間原物料/產品之移轉;

V使用實體屏障系統(包括隔離裝置)作為圍堵措施;

vi 有控制之移除接近汙染物來源的粉塵, 例如透過局部抽除;

vii 專用之<u>設備、專用之產品接觸零件</u>或專用選定之<u>難以清</u> 潔的零件(如過濾器),以及專用之維護保養工具;

### 改版後(PE 009-14)之規定

5.21 品質風險管理過程的結果應作為確定控制交叉污染風險 所需之技術及組織措施程度的基礎。這些可能包括但不侷限 於以下內容:

技術措施 (13項)

viii使用一次性使用之抛棄式技術;

ix使用易於清潔的設備;

x 適當使用氣鎖室及壓力梯度,以將潛在空氣污染物侷限在 特定區域內;

### 改版後(PE 009-14)之規定

5.21 品質風險管理過程的結果應作為確定控制交叉污染風險 所需之技術及組織措施程度的基礎。這些可能包括但不侷限 於以下內容:

技術措施 (13項)

Xi 將由未經處理或處理不足之空氣再循環或重新進入所造成的污染風險降至最低;

xii使用經確效其有效性之自動原位清潔系統;

xiii 對於共同的一般洗滌區域,將設備之洗滌區、乾燥區與儲存區予以分開。

### 改版後(PE 009-14)之規定

5.21 品質風險管理過程的結果應作為確定控制交叉污染風險 所需之技術及組織措施程度的基礎。這些可能包括但不侷限 於以下內容:

#### 組織措施 (10項)

i 在時段切換基礎上(以時間分隔之專用)使整個製造設施或自足圍堵生產區域為專用,接著進行經確效其有效性的清潔過程;

ii 在處理交叉污染高風險產品時,其特定防護裝應留在該區域內;

#### 改版後(PE 009-14)之規定

5.21 品質風險管理過程的結果應作為確定控制交叉污染風險 所需之技術及組織措施程度的基礎。這些可能包括但不侷限 於以下內容:

組織措施 (10項)

iii 針對呈現較高風險之產品,每一產品時段切換生產後的清潔確認應被視為一種可檢測性工具,以支持其品質風險管理方法之有效性;

iv取決於污染風險,為了證明防止空氣浮游污染或機械轉移污染之控制措施的有效性(airborne contamination or contamination by mechanical transfer), 確認非產品接觸表面的清潔與監控製造區域及/或鄰接區域的空氣;

### 改版後(PE 009-14)之規定

5.21 品質風險管理過程的結果應作為確定控制交叉污染風險 所需之技術及組織措施程度的基礎。這些可能包括但不侷限 於以下內容:

組織措施 (10項)

V廢棄物處理、受污染的沖洗水及髒衣服的特定措施;

vi 記錄溢出、意外事件或偏離程序;

vii 廠房設施與設備之清潔過程的設計,使清潔過程本身不會呈現交叉污染風險;

#### 改版後(PE 009-14)之規定

5.21 品質風險管理過程的結果應作為確定控制交叉污染風險 所需之技術及組織措施程度的基礎。這些可能包括但不侷限 於以下內容:

組織措施 (10項)

viii 設計清潔過程的詳細紀錄,以確保依核准之程序完成清潔,並在設備上及製造區域使用清潔狀態標籤;

ix 基於時段切換使用共同的一般洗滌區;

X工作行為之監督,以確保訓練之有效性及符合相關之程序 管制。

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- 1. 第三章 廠房設施與設備 廠房設施---生產區 (3.6)
- 2. 第五章 生產
- 2.1生產中交叉污染的防止(5.17, 5.18, 5.19, 5.20, 5.21)
- 2.2 PI 046-1--- GUIDELINE ON SETTING HEALTH BASED EXPOSURE LIMITS FOR USE IN RISK IDENTIFICATION IN THE MANUFACTURE OF DIFFERENT MEDICINAL PRODUCTS IN SHARED FACILITIES
- 2.3 原料 (5.27, 5.28, 5.29, 5.30, 5.34, 5.35, 5.36)
- 2.4 PI 045-1 --- GUIDELINES ON THE FORMALISED RISK ASSESSMENT FOR ASCERTAINING THE APPROPRIATE GOOD MANUFACTURING PRACTICE FOR EXCIPIENTS OF MEDICINAL PRODUCTS FOR HUMAN USE
- 2.5因製造限制造成產品短缺(5.71)

#### PIC/S Guideline --- PI 046-1

1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities



# PHARMACEUTICAL INSPECTION CONVENTION PHARMACEUTICAL INSPECTION CO-OPERATION SCHEME

PI 046-1 Annex 1 July 2018

CUIDELINE ON SETTING HEALTH BASED EXPOSURE
LIMITS FOR USE IN RISK IDENTIFICATION IN
THE MANUFACTURE OF DIFFERENT MEDICINAL
PRODUCTS IN SHARED FACILITIES

#### PIC/S Guideline --- PI 046-1

1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

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**PIC/S Guideline --- PI 046-1** 1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### 1. DOCUMENT HISTORY

The present PIC/S Guidelines are based on document EMA/CHMP/CVMP/SWP/169430/2012, which has been drafted by the EMA and transposed for PIC/S purpose by the PIC/S Sub-Committee on the Harmonisation of GM(D)P.

These guidelines have been adopted by PIC/S as a guidance document. It is up to each PIC/S Participating Authority to decide whether it should become a legally-binding standard.

#### PIC/S Guideline --- PI 046-1

1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### 2. INTRODUCTION

2.1 When different medicinal products are produced in shared facilities, the potential for cross-contamination is a concern. Medicinal products provide a benefit to the intended patient or target animal; however as a cross contaminant, they provide no benefit to the patient or target animal and may even pose a risk. Hence, the presence of such contaminants should be managed according to the risk posed which in turn are related to levels that can be considered safe for all populations. To this end, health based <u>limits</u> through the derivation of a safe threshold value **should be employed** to identify the risks posed. The derivation of such a threshold value (e.g. permitted daily exposure (PDE) or threshold of toxicological concern (TTC) should be the result of a structured scientific evaluation of all available pharmacological and toxicological data including both non-clinical and clinical data. 31

#### **PIC/S Guideline --- PI 046-1** 1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### 2. INTRODUCTION

- 2.2 During the manufacture of medicinal products accidental cross-contamination can result from the uncontrolled release of dust, gases, vapours, aerosols, genetic material or organisms from active substances, other starting materials, and other products being processed concurrently, as well as from residues on equipment, and from operators' clothing.
  - 5.18 應防止原料或產品被另一原物料或產品污染。該意外交叉污染的風險,源於製程中未管制之原料藥、其他原物料(起始或製程中)及產品所產生的粉塵、氣體、蒸氣、氣霧、基因材料或微生物、設備上的殘留物及因作業人員的服裝等,應被評估。.......

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### 2. INTRODUCTION

2.2 Due to the perceived risk, certain classes of medicinal product have previously been required to be manufactured in dedicated or segregated self-contained facilities including, "certain antibiotics, certain hormones, certain cytotoxics and certain highly active drugs". Until now no official guidance is available in order to assist manufacturers to differentiate between individual products within these specified classes. Chapters 3 and 5 of the GMP guideline have been revised to promote a science and risk-based approach and refer to a "toxicological evaluation" for establishing threshold values for risk identification.

**PIC/S Guideline --- PI 046-1** 1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### 2. INTRODUCTION

2.3 Cleaning is a risk reducing measure and carry-over limits for cleaning validation studies are widely used in the pharmaceutical industry. A variety of approaches are taken in order to establish these limits and often do not take account of the available pharmacological and toxicological data. Hence, a more scientific case by case approach is warranted for risk identification and to support risk reduction measures for all classes of pharmaceutical substances.

**PIC/S Guideline --- PI 046-1** 1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### 2. INTRODUCTION

2.4 The objective of this guideline is to recommend an approach to review and evaluate pharmacological and toxicological data of individual active substances and thus enable determination of threshold levels as referred to in the GMP guideline. These levels can be used as a risk identification tool and can also be used to justify carry over limits used in cleaning validation. While Active Pharmaceutical Ingredients (APIs) are not discussed in Chapters 3 and 5 of the GMP guideline, the general principles outlined in this guideline to derive a threshold value for risk identification could be applied where required.

#### PIC/S Guideline --- PI 046-1

1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### 2. INTRODUCTION

2.5 Deviation from the main approach highlighted in this guideline to derive safe threshold levels could be accepted if adequately justified.

PIC/S Guideline --- PI 046-1

1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### 4. DETERMINATION OF HEALTH BASED EXPOSURE LIMITS

#### 4.1 Calculation of a Permitted Daily Exposure (PDE)

What is PDE?

#### PDE--- Permitted Daily Exposure

It represents a substance-specific dose that is unlikely to cause an adverse effect if an individual is exposed at or below this dose every day for a lifetime.

#### PIC/S Guideline --- PI 046-1

1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

PDE = NOAEL x Weight Adjustment F1 x F2 x F3 x F4 x F5

NOAEL: No Observed Adverse Effect Level 無明顯損害作用水平

F1: A factor (values between 2 and 12) to account for extrapolation between species. 因子(值從2~12)考慮種群變化

F2: A factor of 10 to account for variability between individuals. 因子從1-10,考慮到個體差異

F3: A factor 10 to account for repeat-dose toxicity studies of short duration, i.e., less than 4-weeks. 因子從1~10,考慮短時間重複劑量毒性研究, 例如小於4周.

F4: A factor (1-10) that may be applied in cases of severe toxicity, e.g. non-genotoxic carcinogenicity, neurotoxicity or teratogenicity.因子從1~10,可能用於嚴重毒性情況,例如:非遺傳毒性的致癌性, 神經毒性, 致畸性.

F5: A variable factor that may be applied if the no-effect level was not established. When only an LOEL is available, a factor of up to 10 could be used depending on the severity of the toxicity. 如果没有建立無影響水平,可以應用一個可變因子。當只有一個LOEL時,根據毒性嚴重性,應用一個1~10的因子.

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#### PIC/S Guideline --- PI 046-1

#### 1 July 2018

Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities

#### Annex

PDE Determination Strategy

Company Name			
Company Address			
<b>Expert Name and Signature</b>		Date	
Assessment Review Date			
Chemical Name/s			
Hazards Identified			
Genotoxicant	YES	NO	UNKNOWN
Reproductive developmental toxicant			
Carcinogen			
Highly sensitizing potential			
Basis for the PDE Justification for selection of "lead" critical effect used for final PDE calculation NOAEL and applied adjustment factors upon which the PDE is based  Reference(s) Publication(s) used to identify the critical effect and dose			

#### **ISPE Volume 7--- Routes for Cross-contamination**

# 1. Mix up wrong materials

# 2. Retention inadequate cleaning

# 3. Mechanical Transfer moving residue from one thing to another

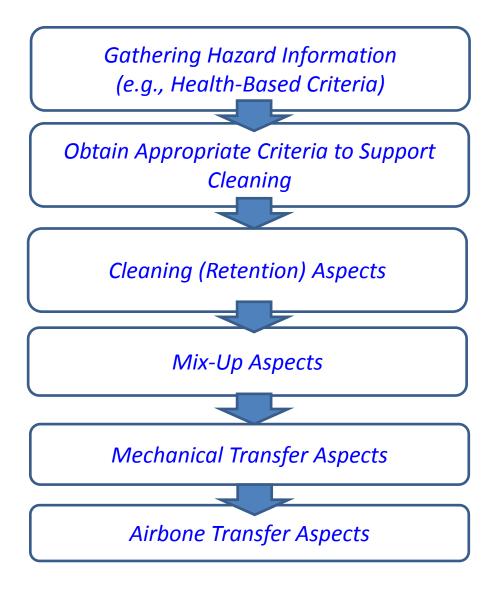
# Airbone Transfer powder available in air and contacts product, equipment

#### **ISPE Volume 7--- Routes for Cross-contamination**

- 1. Mix up
- 2. Retention
- 3. Mechanical Transfer
- 4. Airbone Transfer

5.18 應防止原料或產品被另一原物料或產品污染。該意外交 又污染的風險,源於製程中未管制之原料藥、其他原物料 (起始或製程中)及產品所產生的粉塵、氣體、蒸氣、氣霧、 基因材料或微生物、設備上的殘留物及因作業人員的服裝等

#### ISPE Volume 7---Determine the need for dedicated facilities



### **ISPE Volume 7--- Cleaning Validation**

### Setting Health-Based Safety Thresholds/Acceptance Limits

### Old vs New Cleaning Limits

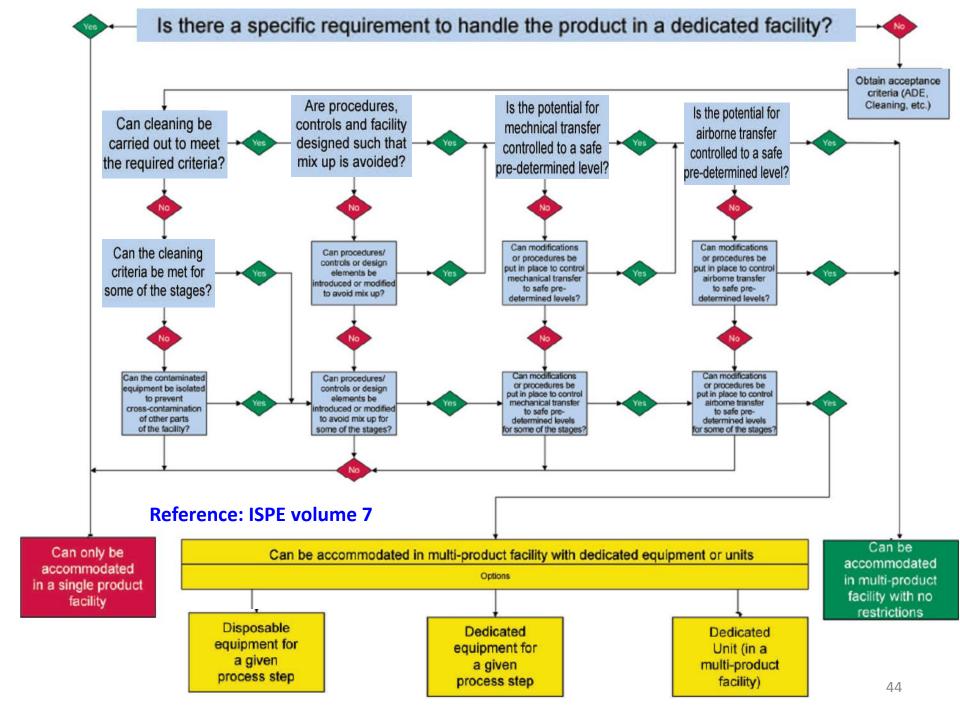
Lowest Marketed Dose MAC Calculation

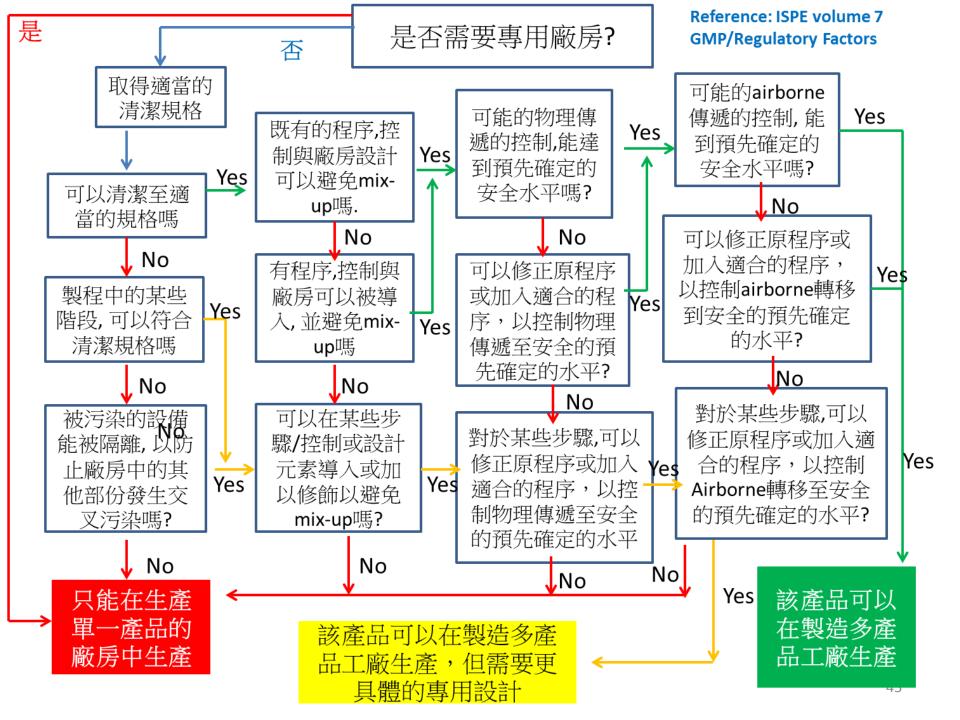
MAC = Lowest Marketed Dose x Batch Size\*

1000 x Max Daily Dose\*

Safety Threshold Value STV = ADE x Batch Size\* Max Daily Dose\*

<sup>\*</sup> Of the next product





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- 2.2 PI 046-1--- GUIDELINE ON SETTING HEALTH BASED EXPOSURE LIMITS FOR USE IN RISK IDENTIFICATION IN THE MANUFACTURE OF DIFFERENT MEDICINAL PRODUCTS IN SHARED FACILITIES
- 2.3 原料(5.27, 5.28, 5.29, 5.30, 5.34, 5.35, 5.36)
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#### 衛生福利部 公告

發文日期:中華民國108年2月23日

發文字號:衛授食字第1081100158號

附件:西藥藥品優良製造規範(第一部)草案1份



主旨:預告修正「西藥藥品優良製造規範(第一部)」部分規

定草案。

依據:藥物優良製造準則第三條。

#### 四、修正內容摘要如下:

- (一)第三章廠房設施與設備:
  - 1、所有產品應有依風險等級管制之交叉汙染防止。
  - 2、毒理學評估藥品相關製造設備之殘留限量。

#### (二)第五章生產:

- 1、生產中之交叉汙染防止分為技術措施(硬體)與組織世施(軟體)。
- 2、原料藥應建立供應鏈之可追溯性,且應對於原料藥 之製造廠及運銷商進行稽核。

#### (三)第八章申訴與產品回收:

- 1、導入風險管理原則整章修正。
- 2、詳述申訴與品質缺陷的處理、評估、調查及檢討。

原料 (5.27, 5.28, 5.29)

### 改版後(PE 009-14)之新增加的規定

- 5.27 原料供應商的選擇、資格認可、核准及維護以及其採購與接受,應作為製藥品質系統文件化的一部分。監督程度應該與由個別原料所呈現之風險成正比,考量它們的來源、製造過程、供應鏈的複雜性以及原料在藥品中的最終用途。應保持每一供應商/原料核准的支持性證據。參與這些活動的工作人員應對供應商、供應鏈及相關風險有最新的了解。可能時,原料應直接從原料製造廠購買.
- 5.28 製造廠為原料制定的品質要求應與供應商討論並達成一 致。生產、測試和控制,包括其處理、標示、分/包裝與運銷 的要求、申訴、回收與拒用程序的適當方面,應在正式之品 質協議或規格中予以文件化。

改版後(PE 009-14)之新增加的規定

5.29 對於原料藥與賦形劑供應商的核准及維護,要求如下:

### 原料藥

應建立<u>供應鏈之可追溯性</u>,從**原料藥之原料至最終產品**的相 關風險應正式評估並定期確認。應採取適當措施,降低原料 藥的品質風險。

應可獲得每種原料藥(包括原料藥之起始原料)的供應鏈與可追溯性紀錄,並由藥品製造廠保存。

### 改版後(PE 009-14)之新增加的規定

5.29 對於原料藥與賦形劑供應商的核准及維護,要求如下:

### 原料藥

應對於原料藥之<u>製造廠及運銷商</u>進行稽核,以確認其符合相關之優良製造規範(GMP)及優良運銷規範(GDP)要求。製造許可的持有者應自行或透過代表其履行合約的一方確認此符合性。

稽核應具適當之期間及範圍,以確保對GMP進行全面及明確的評估;應考慮到來自於現場其他原料之潛在交叉污染。報告應充分反映在稽核過程中所執行及所見的情況,並明確指出任何不足之處。任何需要的矯正預防行動應予執行。

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改版後(PE 009-14)之新增加的規定

5.29 對於原料藥與賦形劑供應商的核准及維護,要求如下:

#### 賦形劑

賦形劑及其供應商應根據PIC/S指引PI 045-1「適用於人用藥品 賦形劑之適當優良製造規範的正式風險評估準則」,基於正 式品質風險評估之結果進行適當管制。

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#### PI 045-1「適用於人用藥品賦形劑之適當優良製造規範的正式風險評估準則」



### PHARMACEUTICAL INSPECTION CONVENTION PHARMACEUTICAL INSPECTION CO-OPERATION SCHEME

PI 045-1 1 July 2018

FOR ASCERTAINING THE APPROPRIATE GOOD

MANUFACTURING PRACTICE FOR EXCIPIENTS OF

MEDICINAL PRODUCTS FOR HUMAN USE

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#### 2. INTRODUCTION

The manufacturing authorisation holder is required to ensure that the excipients are suitable for use in medicinal products by ascertaining what the appropriate good manufacturing practice (GMP) is.

The appropriate GMP for excipients of medicinal products for human use shall be ascertained on the basis of a formalised risk assessment in accordance with these guidelines.

#### 2. INTRODUCTION

Manufacturing authorisation holders should have the risk assessment/management documentation for appropriate GMP for excipients available on site for review by GMP inspectors.

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# 4. DETERMINATION OF APPROPRIATE GMP BASED ON TYPE AND USE OF EXCIPIENT

4.2 These quality risk management principles should be used to assess the risks presented to the quality, safety and function of each excipient and to classify the excipient in question, e.g. as low risk, medium risk or high risk. Quality risk management tools such as those listed in Annex 20 (e.g. hazard analysis and critical control points — HACCP) should be used for this purpose.

# 4. DETERMINATION OF APPROPRIATE GMP BASED ON TYPE AND USE OF EXCIPIENT

4.3 For each excipient from each manufacturer used, the manufacturing authorisation holder should identify the risks presented to the quality, safety and function of each excipient from its source — be that animal, mineral, vegetable, synthetic, etc. — through to its incorporation in the finished pharmaceutical dose form.

- 4.3 Areas for consideration should include, but are not limited to:
- (a) transmissible spongiformencephalopathy; (TSE)
- (b) potential for viral contamination;
- (c) potential for microbiological or endotoxin/pyrogen contamination;
- (d) potential, in general, for any impurity <u>originating from</u> the raw materials, e.g. aflatoxins or pesticides, or generated as part of the process and carried over, e.g. residual solvents and catalysts;

- 4.3 Areas for consideration should include, but are not limited to:
- (e) sterility assurance for excipients claimed to be sterile;
- (f) potential for any impurities carried over from other processes, in <a href="mailto:absence of dedicated">absence of dedicated</a> equipment and/or facilities;
- (g) environmental control and storage/transportation conditions including cold chain management, if appropriate;
- (h) supply chain complexity;

- 4.3 Areas for consideration should include, but are not limited to:
- (i) stability of excipient;
- (j) packaging integrity evidence.

- 4.4 Additionally, with respect to the use and function of each excipient, the manufacturing authorisation holder should consider:(a) the pharmaceutical form and use of the medicinal product containing the excipient;
- (b) the function of the excipient in the formulation, e.g. lubricant in a tablet product or preservative material in a liquid formulation, etc.;
- (c) the proportion of the excipient in the medicinal product composition;

- 4.4 Additionally, with respect to the use and function of each excipient, the manufacturing authorisation holder should consider:
- (d) daily patient intake of the excipient;
- (e) any known quality defects/fraudulent adulterations, both globally and at a local company level related to the excipient;
- (f) whether the excipient is a composite;

- 4.4 Additionally, with respect to the use and function of each excipient, the manufacturing authorisation holder should consider:
- (g) known or potential impact on the critical quality attributes of the medicinal product;
- (h) other factors as identified or known to be relevant to assuring patient safety.

- 4.6 These elements will vary <u>depending on the source, the supply</u> <u>chain and the subsequent use of the excipient</u>, but **as a minimum** the following high level GMP elements should be considered by the manufacturing authorisation holder:
- (a) establishment and implementation of an effective pharmaceutical quality system;
- (b) sufficient competent and appropriately qualified personnel;
- (c) defined job descriptions for managerial and supervisory staff responsible for manufacturing and quality activities;

- 4.6 These elements will vary depending on the source, the supply chain and the subsequent use of the excipient, but as a minimum the following high level GMP elements should be considered by the manufacturing authorisation holder:
- (d) training programmes for all staff involved in manufacturing and quality activities (included but not limited to cleaning, engineering, laboratory, maintenance, materials management, safety, and technical services);
- (e) training programmes related to health, hygiene and clothing as identified as necessary to the intended operations;

- 4.6 These elements will vary depending on the source, the supply chain and the subsequent use of the excipient, but as a minimum the following high level GMP elements should be considered by the manufacturing authorisation holder:
- (f) provision and maintenance of premises and equipment appropriate to the intended operations;
- (g) documentation system(s) covering all processes and specifications for the various manufacturing and quality operations;
- (h) systems for coding and identifying starting materials, intermediates and excipients to allow full traceability;

- 4.6 These elements will vary depending on the source, the supply chain and the subsequent use of the excipient, but as a minimum the following high level GMP elements should be considered by the manufacturing authorisation holder:
- (i) qualification program of suppliers;
- (j) system for quality control of the excipient and a responsible person independent from production to release the batches;

# 4. DETERMINATION OF APPROPRIATE GMP BASED ON TYPE AND USE OF EXCIPIENT

- 4.6 These elements will vary depending on the source, the supply chain and the subsequent use of the excipient, but as a minimum the following high level GMP elements should be considered by the manufacturing authorisation holder:
- (k) retention of records for incoming materials and excipients and retention of samples of excipients for the periods required by PIC/S Guide to Good Manufacturing Practice for Medicinal Products, Part II;
- (I) systems to ensure that any activity contracted out is subject to a written contract;

# 4. DETERMINATION OF APPROPRIATE GMP BASED ON TYPE AND USE OF EXCIPIENT

4.6 These elements will vary depending on the source, the supply chain and the subsequent use of the excipient, but as a minimum the following high level GMP elements should be considered by the manufacturing authorisation holder:

(m)maintenance of an effective system whereby complaints are reviewed and excipients may be recalled;

- (n) change management and deviation management system;
- (o) self-inspection program;
- (p) environmental control and storage conditions.

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# 5. DETERMINATION OF EXCIPIENT MANUFACTURER'S RISK PROFILE

- 5.1 After determination of the appropriate GMP, a gap analysis of the required GMP against the activities and capabilities of the excipient manufacturer should be performed.
- 5.2 Data/evidence to support the gap analysis should be obtained through audit or from information received from the excipient manufacturer.

# 5. DETERMINATION OF EXCIPIENT MANUFACTURER'S RISK PROFILE

5.3 Certification of quality systems and/or GMP held by the excipient manufacturer and the standards against which these have been granted should be considered as such certification may fulfil the requirements, subject to national legislation requirements.

# 5. DETERMINATION OF EXCIPIENT MANUFACTURER'S RISK PROFILE

5.4 Any gaps identified between the required GMP and the activities and capabilities of the **excipient manufacturer** should be documented.

Furthermore, the manufacturing authorisation holder should perform a further risk assessment to determine the risk profile, e.g. low risk,medium risk or high risk, for that excipient manufacturer. PIC/S PE 009 Guide to Good Manufacturing Practice for Medicinal Products Annex 20: Quality Risk Management should be used for that purpose. Quality risk management tools such as those listed there—HACCP etc.—should be used for this.

# 5. DETERMINATION OF EXCIPIENT MANUFACTURER'S RISK PROFILE

5.5 The manufacturing authorisation holder should have a series of strategies ranging from acceptance through control to unacceptable for the different risk profiles and based on these a control strategy, e.g. audit, document retrieval and testing, should be established.

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#### 6. CONFIRMATION OF APPLICATION OF APPROPRIATE GMP

- 6.1 Once the appropriate GMP for the excipient and the risk profile of the excipient manufacturer have been defined, ongoing risk review should be performed through mechanisms such as:
- (a) number of defects connected to batches of excipient received;
- (b) type/severity of such defects;
- (c) monitoring and trend analysis of excipient quality;
- (d) loss of relevant quality system and/or GMP certification by excipient manufacturer;

#### 6. CONFIRMATION OF APPLICATION OF APPROPRIATE GMP

- 6.1 Once the appropriate GMP for the excipient and the risk profile of the excipient manufacturer have been defined, ongoing risk review should be performed through mechanisms such as:
- (d) observation of trends in drug product quality attributes; this will depend on the nature and role of excipient;
- (e) observed organisational, procedural or technical/process changes at the excipient manufacturer;
- (f) audit/re-audit of excipient manufacturer;

#### 6. CONFIRMATION OF APPLICATION OF APPROPRIATE GMP

6.1 Once the appropriate GMP for the excipient and the risk profile of the excipient manufacturer have been defined, ongoing risk review should be performed through mechanisms such as:

(g) questionnaires.

Based on the outcome of the risk review, the established control strategy should be reviewed and revised if needed.

## Presentation summary

- 1. 第三章 廠房設施與設備 廠房設施---生產區 (3.6)
- 2. 第五章 生產
- 2.1生產中交叉污染的防止(5.17, 5.18, 5.19, 5.20, 5.21)
- 2.2 PI 046-1--- GUIDELINE ON SETTING HEALTH BASED EXPOSURE LIMITS FOR USE IN RISK IDENTIFICATION IN THE MANUFACTURE OF DIFFERENT MEDICINAL PRODUCTS IN SHARED FACILITIES
- 2.3 原料 (5.27, 5.28, 5.29, 5.30, 5.34, 5.35, 5.36)
- 2.4 PI 045-1 --- GUIDELINES ON THE FORMALISED RISK ASSESSMENT FOR ASCERTAINING THE APPROPRIATE GOOD MANUFACTURING PRACTICE FOR EXCIPIENTS OF MEDICINAL PRODUCTS FOR HUMAN USE 2.5因製造限制造成產品短缺(5.71)

原料 (5.30, 5.34, 5.35, 5.36)

#### 有關原料的接收規定

#### 原規定 (PE 009-13)

5.27 每一次交貨,應檢查/核對容器的包裝、封條的完整性 及送貨單與供應商標示之一致性。

#### 改版後(PE 009-14)之規定

5.30 原料的每一次交貨,應檢查/核對容器包裝的完整性, 包括相關時防竄改易顯封緘、送貨單、採購訂單、供應商標 示,以及由藥品製造廠維護之經核准的製造廠與供應商資訊 之一致性。每次交貨的接收檢查應文件化.

#### 有關原料的有效期限規定

#### 原規定 (PE 009-13)

5.31 僅有經品質管制部門放行,且還在**架儲期間**內的原料始可使用。

### 改版後(PE 009-14)之規定

5.34 僅有經品質管制部門放行,且還在**再驗日期**內的原料始可使用。

#### 有關原料的檢驗規定

#### 改版後(PE 009-14)之新增加規定

5.35 最終產品製造廠負責按上市許可檔案文件中所描述之原料(註3)的任何測試。可以採用經核准之原料製造廠的部分或全部測試結果,但必須根據附則8至少對每批次進行鑑別試驗(註4)。

註3: 類似的方法應適用於第5.45節所述之包裝材料。

註4: 原料的鑑別試驗應依相關上市許可檔案文件的方法及規格進行。

#### 有關原料的檢驗規定

### 改版後(PE 009-14)之新增加規定

- 5.36 該**委外測試**的理論基礎<u>應證明其合理性及文件化</u>,且應 符合以下要求:
- i. 為了保持原料的品質特性,並確保測試結果適用於送交之原料,應特別注意運銷管制(運送,批發,儲存與交貨)。
- ii 為了確保符合優良製造規範與上市許可檔案文件中所描述 之規格及測試方法,藥品製造廠應基於執行原料測試(包括 抽樣)場所之風險,於適當間隔,自行或透過第三方稽核之。

#### 有關原料的檢驗規定

### 改版後(PE 009-14)之新增加規定

5.36 該**委外測試**的理論基礎應證明其合理性及文件化,且應符合以下要求:

iii 原料製造廠/供應商提供之分析證明書,應由具適當資格 及經驗之指定人員簽章。該簽章是確保每一批次皆經過核對 符合協議的產品規格,除非另外提供。

iv藥品製造廠應具備處理原料製造廠的適當經驗(包括透過供應商的經驗),包括評估先前收到之批次及在減少內部測試之前的符合性歷史。應考慮原料製造或測試過程中的任何重要變更;

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#### 有關原料的檢驗規定

### 改版後(PE 009-14)之新增加規定

5.36 該**委外測試**的理論基礎應證明其合理性及文件化,且應符合以下要求:

V為了檢查原料製造廠或供應商提供之分析證明書的可靠性, 藥品製造廠亦應基於風險在適當的間隔進行全項檢驗(或透 過另外核准的合約實驗室),並將結果進行比較。如果該測 試識別出任何差異,則應進行調查並採取適當措施,完成這 些措施前,應停止接受原料製造廠或供應商的分析證明書。

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#### 因應製造限制造成產品短缺

#### 改版後(PE 009-14)之新增加規定

5.71 製造廠應向上市許可持有者報告製造作業中可能導致供 應異常限制的任何限制條件。這應適時進行,以便於上市許 可持有者根據其法定義務向主管機關報告供應限制。

#### 藥事法第 27-2條

藥商持有經中央衛生主管機關公告為必要藥品之許可證,如有無法繼續製造、輸入或不足供應該藥品之虞時,應至少於六個月前向中央衛生主管機關通報;如因天災或其他不應歸責於藥商之事由,而未及於前述期間內通報者,應於事件發生後三十日內向中央衛生主管機關通報。

中央衛生主管機關於接獲前項通報或得知必要藥品有不足供應之虞時,得登錄於公開網站,並得專案核准該藥品或其替代藥品之製造或輸入,不受第三十九條之限制。

第一項通報與前項登錄之作業及專案核准之申請條件、審查程序、核准基準及其他應遵行事項之辦法,由中央衛生主管機關定之。

受文者:中華民國製藥發展協會

發文日期:中華民國108年3月27日 發文字號:健保審字第1080035148號

速別:最速件

密等及解密條件或保密期限:

附件:電子檔請自行於本署全球資訊網下載

主旨:重申屬健保已給付之藥品,許可證持有藥商因故不再供應 或無法供應藥品時,應依法辦理並以「短缺藥品庫存量及 供貨計劃表」通報本署,請查照並轉知所屬會員。

#### 說明:

- 一、依據全民健康保險藥物給付項目及支付標準第 12-1 條規定,對於本保險已收載之藥品品項,有替代性品項可供病人使用,且符合以下情形之一者,本署將依法將該品項不列入健保給付範圍一年。
  - (一)因故不再供應且未於六個月前通報保險人者。
  - (二)有不可抗力因素,致無法供應時,未於該發生日起十日 內通報保險人。

Thank you for your attention.

# 参考文件 1 --- PIC/S 附則2

### 參考文件 1 --- PIC/S 附則2

附則2人用生物原料藥及產品的製造

#### • 圍堵Containment

把生物媒介物或其他實體侷限在所界定的空間之行動。

#### • 圍堵區Contained area

為避免外界環境受到來自此區域之內的生物媒介物污染為目的所設計與運轉的區域(並配置適當的空氣處理及過濾裝置)。

#### 参考文件 1 --- PIC/S 附則2

附則2人用生物原料藥及產品的製造

#### • 一級圍堵:

- 一種阻止生物媒介物散逸到<u>緊鄰</u>之作業區的圍堵系統。包括 用密閉容器或生物安全櫃,連同其確保安全的作業程序。
- 14. 一級圍堵應經設計並定期測試,以確保防止生物劑 (biological agents) 逸入直接的工作環境。
- 18. 一級圍堵應經設計並測試證明其無洩漏的風險。

### 參考文件 1 --- PIC/S 附則2

附則2人用生物原料藥及產品的製造

#### • 次級圍堵:

一種阻止生物媒介物散逸到外界環境或其他作業區的圍堵系統。包括具有特殊設計空氣處理之作業室的使用、供物質的退出之氣鎖室及/或滅菌器,以及確保安全的作業程序。在許多情況中,可以增加一級圍堵的有效性。