衛生福利部食品藥物管理署委辦計畫「精進核酸藥物等再生醫療製劑與無菌藥品品質管理之研究」

無菌藥品 GMP 研習營

日期:民國 112年 5月 19日

主辦單位:衛生福利部食品藥物管理署

承辦單位:TPDA 社團法人中華無菌製劑協會

講 節 資 料

盧蘊澤 博士/ 奥星台灣有限公司顧問

時間表

時間	課程內容	講師
8:30-9:00	報到	
9:00-9:10	長官致詞	TFDA 代表
9:10-10:30	▶ 污染的可能來源▶ 污染物種類與管控▶ 污染管制策略(CCS)涵括要素說明	盧蘊澤 博士
10:30-10:50	休息	
10:50-12:10	▶ 建立污染管制策略(CCS)文件	盧蘊澤 博士
12:10-13:30	午餐	
13:30-13:40	分組討論議題說明	主持人
13:40-15:00	分組討論	各組組長
15:00-16:30	小組報告(每組15分鐘)	各組報告人
16:30-17:00	總結與課後測驗	TFDA 代表 主持人 講師

目 錄

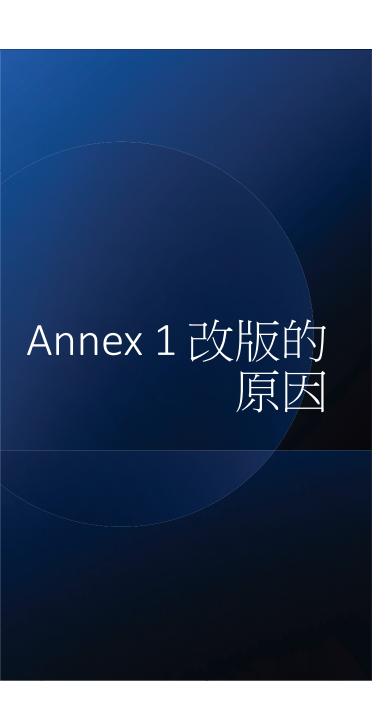
		頁次
♦	CCS文件組成、文件架構	5
♦	污染控制策略的有效性	18
♦	建立與CCS的差異分析	25
♦	CCS分項之發展	30
♦	分組討論議題	55
♦	小組長名單	58



簡報大綱

- ▶ CCS文件組成、文件架構; how to document it
- ▶ CCS 控制策略的有效性
- ▶ 建立與CCS的差異分析
- ▶ CCS分項之發展

Page 2



Reasons for changes: The GMP/GDP Inspectors Working Group and the PIC/S Committee jointly recommend that the current version of annex 1, on the manufacture of sterile medicinal products, is revised to reflect changes in regulatory and manufacturing environments. The new guideline should clarify how manufacturers can take advantage of new possibilities deriving from the application of an enhanced process understanding by using innovative tools as described in the ICH Q9 and Q10 guidelines. The revision of Annex 1 should also take into account related changes in other GMP chapters and annexes as well as in other regulatory documents. The revised guideline will seek to remove ambiguity and inconsistencies and will take account of advances in technologies.



Brussels, 22.8.2022 C(2022) 5938 final

GUIDELINES

The Rules Governing Medicinal Products in the European Union Volume 4 EU Guidelines for Good Manufacturing Practice for Medicinal Products for Human and Veterinary Use

Annex 1

Manufacture of Sterile Medicinal Products

Annex 1 Chapter 1. Scope

This Annex provides general guidance that should be used in the design and control of facilities, equipment, systems and procedures used for the manufacture of all sterile products applying the principles of Quality Risk Management (QRM), to ensure that microbial, particulate and endotoxin/pyrogen contamination is prevented in the final product.

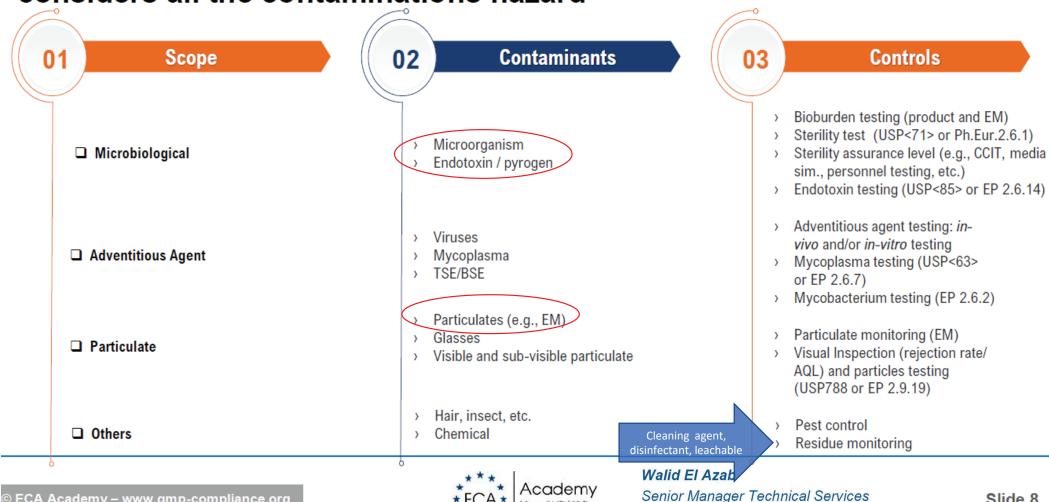
QRM applies to this document in its entirety and will not, normally, be referred to in specific paragraphs. Where specific limits or frequencies or ranges are specified, these should be considered as a minimum requirement. They are stated due to historical regulatory experience of issues that have been identified and have impacted the safety of patients.



CCS Glossary (Definition)

- "Contamination Control Strategy (CCS) A planned set of controls for microorganisms, endotoxin/pyrogen and particles, derived from current product and process understanding that assures process performance and product quality. The controls can include parameters and attributes related to active substance, excipient and drug product materials and components, facility and equipment operating conditions, in process controls, finished product specifications, and the associated methods and frequency of monitoring and control."
- Contamination from microbial derived and particles are main scope but not limited to.
 - e.g. Para. 8.132, 136都提到 leachable
 - e.g. 處理病毒,載體等作業場所須考慮viral material containment
- Para 2.5 清楚描述16個必要的elements

Scope of the CCS document is facility and process dependent: considers all the contaminations hazard



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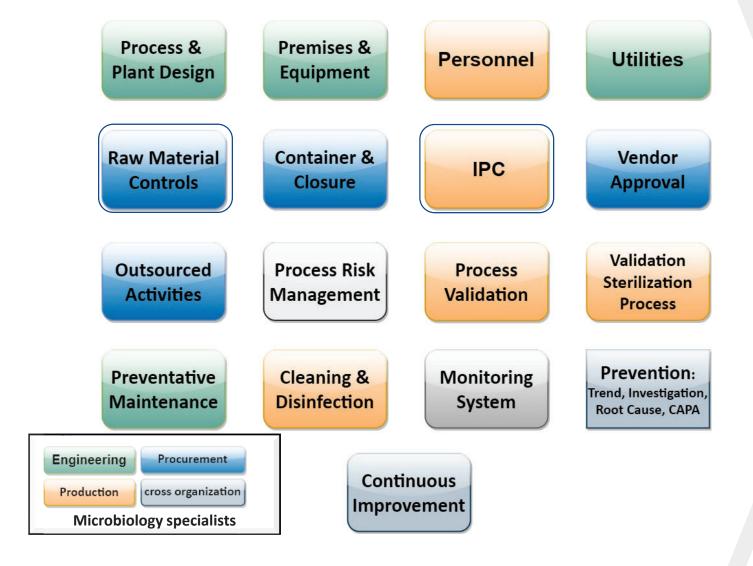
STERIS

Slide 8

Page 7

2.5 The development of the CCS requires detailed technical and process knowledge. Potential sources of contamination are attributable to microbial and cellular debris (e.g. pyrogen, endotoxin) as well as particulate (e.g. glass and other visible and sub-visible particles). Elements to be considered within a CCS should include (but are not limited to):

- i. design of both the plant and processes including the associated documentation;
- ii. premises and equipment;
- iii. personnel;
- iv. utilities;
- v. raw material controls including in-process controls;
- vi. product containers and closures;
- vii. vendor approval such as key component suppliers, sterilisation of components and single use systems (SUS), and critical service providers;
- viii. management of outsourced activities and availability/transfer of critical information between parties, e.g. contract sterilisation services;
- ix. process risk management;
- x. process validation;
- xi. validation of sterilisation processes;
- xii. preventative maintenance maintaining equipment, utilities and premises (planned and unplanned maintenance) to a standard that will ensure there is no additional risk of contamination;
- xiii. cleaning and disinfection;
- xiv. monitoring systems including an assessment of the feasibility of the introduction of scientifically sound, alternative methods that optimize the detection of environmental contamination;
- xv. prevention mechanisms trend analysis, detailed investigation, root cause determination, corrective and preventive actions (CAPA) and the need for comprehensive investigational tools;
- xvi. continuous improvement based on information derived from the above.





Contamination Control Strategy – The Document!

Important to consider for a CCS document:

- It should be a compilation that allows to FIND the respective document, which can be:
 - ✓ SOPs : QA, Manufacture, Procurement, Monitoring, New product or process introduction...
 - ✓ Work instructions
 - ✓ Reports
 - ✓ Risk Assessments
 - ✓ Qualification Reports
 - ✓ Validation Reports
- It does not have to summarize the contents of these documents, but should rather <u>indicate</u> the contents, if not clear by the title.
- The CCS document guides the reader to the respective relevant documents and should cover the main purpose of these documents, but – to avoid mismatches and conflicting statements – not repeat or summarize in detail the contents of the underlying documents.
- Like a Site Master File, this CCS document needs to be <u>kept current</u> but not updated with, e.g., a new version of an SOP quoted in the document.





https://www.eca-foundation.org/news/ccs-task-force-issues-new-guideline.html

Attachment 2

新廠使用

- 1. Purpose and scope of the document
- 2. Definitions and abbreviations
- 3. List of the GMP sites
- 4. Brief description of the plants and facilities (refer to SMF)
- 5. Brief description of product currently manufactured
- 6. CCS and site's objective
- 7. CCS scope
- 8. CCS cross-functional team
- 9. Roles and responsibilities
- 10. CCS communication and decision-making process
- 11. QRM scope in regard to the CCS requirements
- 12. Elements to consider for the CCS (12 sub titles)
- 13. CCS Evaluation
 - a. Overview of the critical controls
 - b. Contamination residual risk threshold
 - c. List of the QRM part of the CCS (See Annex C)
 - d. Routine KPI and target (see Annex B)
 - e. Periodic review of the CCS
 - f. Elements that trigger the CCS review
- 14. Continuous improvement and governance decision (see annex A)
- 15. Conclusion
- 16. References
- 17. Document history
- 18. Annexes
 - a. List/link of QRM related to CCS
 - b. List/link of the procedures/policies related to CCS
 - c. List/Link to the rationale, strategy/position paper, etc.
 - d. Link to gap analysis
 - e. Summary of the improvement to implement
 - f. Summary of the KPI to follow in routine. Including e.g., EM data, etc.

https://www.eca-foundation.org/news/ccs-task-force-issues-new-guideline.html

Attachment 3

做為分析與現況差距的模板

ı	abie	or contents
٩.		Introduction
3		Documentation of the Contamination Control Strategy
	B.1.	Design of both, the plant and processes including the associated documentation6
	B.2.	Premises and Equipment
	в.з.	Personnel 8
	B.4.	Utilities
	B.5.	Raw Material Controls – including in-process controls11
	В.6.	Product Containers and Closures
	В.7.	Vendor approval – such as key component suppliers, sterilisation of components and single use systems (SUS), and critical service providers12
	B.8.	Management of outsourced activities and availability / transfer of critical information between parties, e.g. contract sterilization services
	B.9.	Process Risk Management14
	B.10	. Process Validation
	B.11	. Validation of Sterilisation Processes
		. Preventative maintenance – maintaining equipment, utilities and premises (planned and unplanned maintenance) to a standard that will ensure there is no additional risk of contamination
		. Cleaning and Disinfection17
	B.14	. Monitoring Systems - including an assessment of the feasibility of the introduction of scientifically sound, alternative methods that optimize the detection of environmental contamination
	B.15	. Prevention – trending analyses, detailed investigation, root cause determination, corrective and preventive actions (CAPA) and the need for comprehensive investigational tools
	B.16	. Continuous improvement based on information derived from the above21
	B.17	. Further relevant aspects – e.g. with regard to viral safety22
2		Summary and Conclusion (including identified gaps and how to assess them)22
)		References
≣.		Attachments
=		Document History

B.4. Utilities

B.4.1 Water

B.4.1.1 Purified Water

B.4.1.2 WFI

B.4.2. Steam

B.4.3. Gases (Product contact compressed air, O2, N2,...)

•••

Description	n Reference Document	
	Title	No.
Specification		
Preparation		
Distribution		
Monitoring	refer to Section B.14.	

Example. B.9. Process Risk Management (Overview of existing RAs for manufacturing / cleaning / decontamination / depyrogenation)

Description	Reference Document			
	Title	No.		
The concept of QRM is implemented				
throughout the organization (SOP)				
A register of RAs is maintained by QA				
RAs for manufacturing processes:				
RAs for aseptic manufacturing processes:				
RAs for cleaning processes:				
RAs for decontamination (incl.				
depyrogenation) processes:				

PDA TR 90 Chapter 19 Template Example for Contamination Control Document

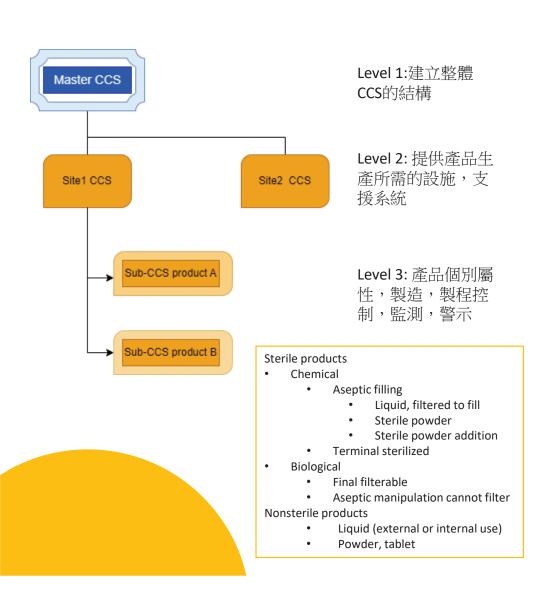
Recommendation from PDA TR90

- Use active verb, describe what occurs on site, not "should"
- State the rational of these controls
- Target 30-50 Pages, refer to other GMP documents
- Align the format to the site or company requirements
- The audience of CCS document is
 - Inspectors
 - All GMP site employee
- The Scope of CCS document
 - Site or product specific
 - Consider multiple CCS document if the scope is too wide for multiple product facilities

PDA TR 90 Chapter 19 Template Example for Contamination Control Document

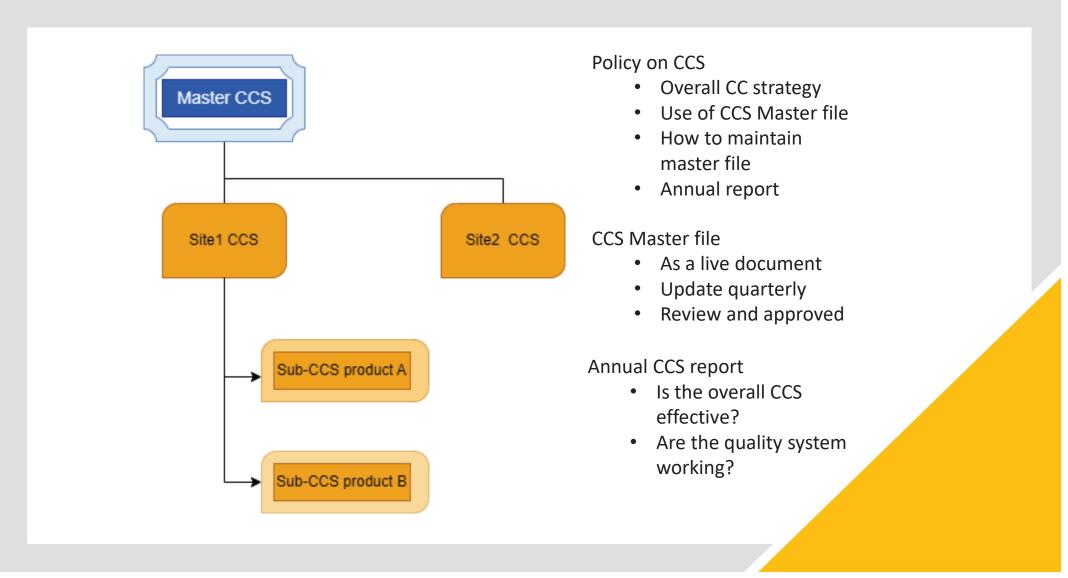
Tips for Contamination Control Document

- 描述事實,使用主動句型>> 描述該廠使用的控制策略,不要使用"應該如何"的字眼, 而是真正的做法。闡述控制策略時,尤其要明確表述何謂關鍵控制,或是當使用非常規的 控制方式時,應予詳細描述。
- 主文預期在30-50Page>> 參照其他GMP的文件,例如SOP,批次紀錄,SMF,報告,風險評估的結果,以附件方式表達。
- 文件格式與廠內的文件要求統一
- CCS文件的目標使用人員>>
 - 查廠人員 >> 這份文件提供給查廠人員,作為該廠對於CCS整體策略的總體描述,舉凡於CCS有關的策略,文件,報告,數據等。
 - 廠內所有與GMP相關的人員,這是一份全方位透明的文件,幫助閱讀者能夠了解CCS架構要素的 關聯性。未來變更時,能夠不至於負面影響CCS。



PDA TR 90 Chapter 19 Template Example for Contamination Control Document

- Tips for Contamination Control Document (Cont.)
- CCS檢討範圍可能是針對廠房,或是製程,個別獨立的文件,依照各公司運作的屬性定義
 - 區隔負責的範圍建立完整的CCS,需要包含端 點到端點的供應鏈。
 - 假如需要建立多份CCS文件,文件之間可以互相參照。
 - 如果有多種產品,使用相似的製程,可以建立一份相似製程的CCS
 - 假如多產品的生產廠址,有多樣的產品,包括不同的製程,例如液體或是固體劑型,無菌與非無菌產品,則需要建立不同的CCS文件



PDA TR 90 Chapter 19 Template Example for Contamination Control Document

Recommend sections from PDA TR90

- 1. Purpose
- 2. Background
- 3. Scope
- 4. Responsibility
- 5. Contamination control strategy elements
- 6. Glossary
- 7. Referenced documents
- 8. Revision history

CCS Elements

- Manufacturing Process Design, Risk Assessment, Validation, and Monitoring
- 2. Facilities Design and Environmental Controls
- 3. Environmental Monitoring
- 4. Equipment Handling, Cleaning, and Sanitization/Sterilization
- 5. Equipment Maintenance
- 6. Utilities Design and Controls
- 7. Alarm System
- 8. Personnel Training and Controls
- 9. Raw Materials and Components
- 10. Containers and Closures
- 11. Vendor Approval
- 12. Contamination and Utility Disruption Response
- 13. Prevention: Quality Systems and Continuous Improvement
- 14. Quality Controls
- 15. Governance and Effectiveness Review

污染控制策略的有效性

Activities, processes, methods, strategies

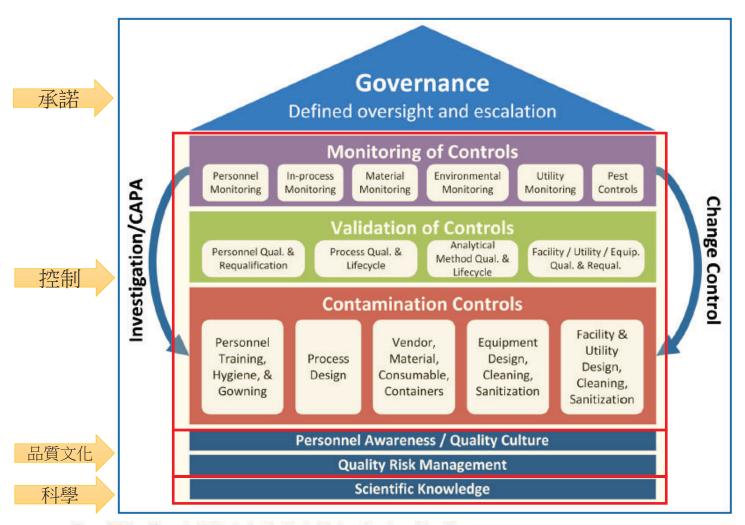
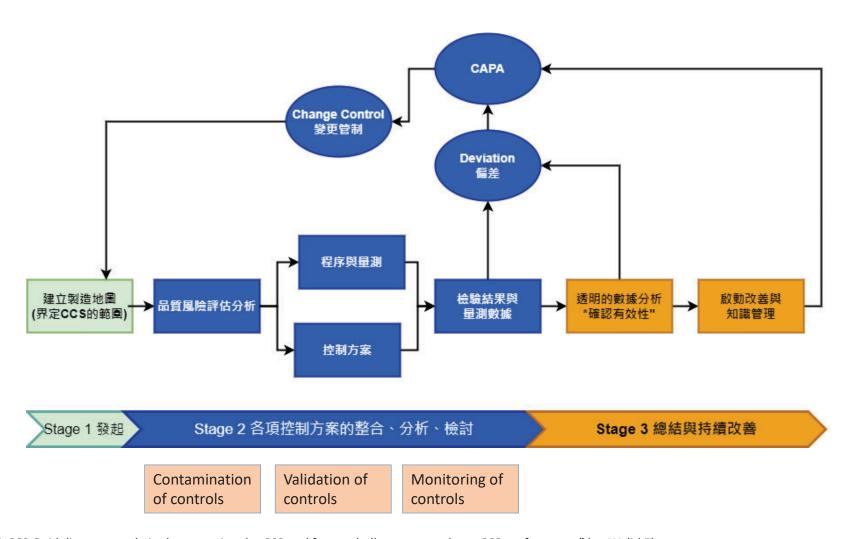


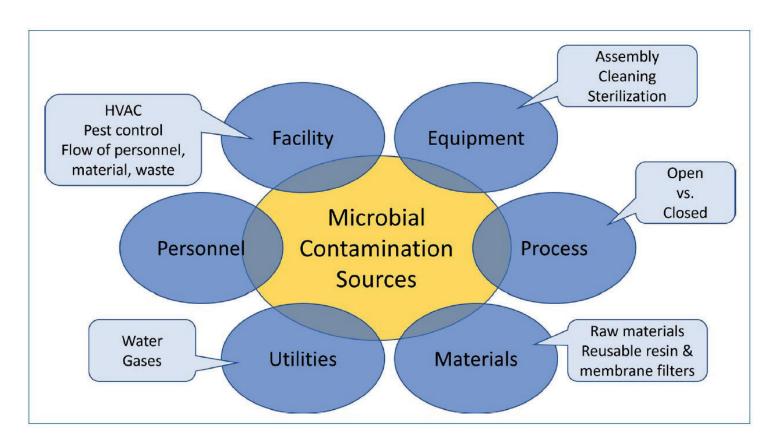
Figure 3.0-1 Elements of a Contamination Control Strategy (courtesy of Sanofi)

Ref. to PDA TR 90



Ref. To "ECA CCS Guideline: example in documenting the CCS and future challenges to evaluate CCS performance" by Walid El Azab Senior Manager Technical Service, STERIS

@ ECA training of Annex 1, 2022, 12.



PDA TR 90 Fig 4.0-1 Potential Sources of Contamination to Consider When Conducting a Microbial Control Risk Assessment (DS)

GAP analysis 分組討論

需使用Risk assessment tool 發展管制重點

組別	分組	Key element	Annex 1 ref.	Key support document/RA
1	Facilities, utilities design, cleaning & sanitization	i. a. Design of plantii. a. Premises (qualification, transfer)iv. Utilities (Water, PW, WFI, PS, Gases)xii. Preventative maintenance/alarm systemxiii. Cleaning and disinfection		
2	Equipment Design, cleaning & sanitization	ii. b. Equipment (process, storage, monitoring device)xii. Preventative maintenance/alarm systemxiii. Cleaning and sterilization (for SU, connection, sterility)		
3	Process Design	i. b. Design of processix. process risk assessmentx. Process Validation; (xi. Validation of sterilization process)		
4	Vender, Material, consumable and container	v. Raw material control vi. Product containers and closures (CCIT) viii. Management of outsourced activities and availability vii. Vendor approval and critical service providers		
5	Personnel training & Hygiene, gowning	iii. Personnel training (quality governance, gowning, manual operation, qualification/disqualification)x. Process Validation (personnel qualification in APS; airflow)		Page 2

 Table 11.5-1
 Examples of Foundational Risk Assessments that Support CCS

Contamination Control Elements	Risk Question	Risk Tool	
	What is the risk of process contamination?	Process FMEA	
Process	What is the risk of cross-contamination between processes in a multiproduct facility?	Cross-contamination FMEA	
Personnel	What is the risk of process contamination from personnel?	Process FMEA	
Environment	What is the risk of process contamination from the	Process FMEA	
Environment	environment?	Monitoring HACCP	
Materials, Consumables	What is the risk of process contamination from raw materials and single-use consumables?	Process FMEA Consumables FMEA (for novel or high-risk items) Monitoring HACCP	
Containers	What is the risk of process contamination from final product containers?	Process FMEA	
Equipment	What is the risk of process contamination from equipment?	Process FMEA Equipment FMEA (for novel or high-risk items)	
Utilities	What is the risk of process contamination from product-contact utilities?	Monitoring HACCP	
Other	Other targeted risk questions, as needed	Multiple	



CCS的目標及要求

- 廠內跨單位的訊息要透明化
- 考慮多重變因的污染控制及量測工作的組合(multi-variant)
- 定義關鍵控制點,以及可允許的限度
- 看到上述多變因控制及量測結果的有效性
- 基於品質風險管理 *ICHQ9
- 看到管理階層審查活動的有效性
- 如期進行更新及審查活動
- 理解現行控制活動的內涵,經CCS參考現行的控制,統合而成



Essence of CCS: Collective Effectiveness of all Controls and Measures.

Ref to "Contamination Control Strategy – Inspector's view on an overarching strategy" by Dr Rainer Gnibl, Government of Upper Bavaria @ ECA Annex 1 Training, 2022, 12.

- Design
- Procedural
- Technical
- Organizational



ECA Task Force on Contamination Control Strategy



Attachment 1: Example of a potential structure of a gap assessment (non-exhaustive)

Key Areas	Key Elements	Detailed CCS Elements	Annex 1 (2022) reference	Identified potential gaps (or documentation improvem needed) versus Annex 1 (2022) expectations	Key supporting Site Strategies, ent Rationales, Risk assesments Include Reference, title and if possible hyperlink to the document	Key Site Procedures Include Reference, title and hyperlink to the document
Key Areas	Key Elements		nnex 1 (2022) eference	potential gaps for documentation improvement needed) versus Annex 1 (2022) expectations	Key supporting Site Strategies, Rationales, Risk assessments Include Reference, tittle and if possible hyperlink to the document	Key Site Procedures Include Reference, title and hyperlink to the document

Key Areas	Key Elements	Detailed CCS Elements		Annex 1 (2022) reference	Identified potential gaps (or documentation improvement needed) versus Annex 1 (2022) expectations
		Facilities Design	Facility design requirements (plant layout, air filtration, material of construction, cleanability, airlock design, logical and chronological activities flows)	4.1, 4.2, 4.3, 4.5, 4.6, 4.7, 4.8, 4.9, 4.10, 4.11, 4.12, 4.13, 4.17 6.6 6.21	4.1 explain how controls and monitoring are "scientifically justified and capable of evaluating the state of environmental conditions for cleanrooms, airlocks and pass-through hatches" transfer" 4.3 Barriers should be considered in the CCS." Any alternative approaches to the use of RABS ans Isolators shoud be justified"
					Develop the current material transfer and airlocks sections using wording of 4.10, 4.11, 4.12, 4.13
			HVAC system design requirements (Air Filtration/HEPA Filters, Pressure cascades, Temperature, RH, locations of air inlets & outlets, ducts cleanability, air exchanges rates, alarms	4.13, 4.14, 4.15, 4.16, 4.36	Develop an adequate section to cover 4.16 "Setpoints and the criticality of pressure differences should be considered within the CCS" / "where alarm delays are set, these should be assessed and justified within the CCS"
			Area Classification / Grade cascading	4.1, 4.4, 4.12, 4.13, 4.20 8.14	No potential gap
Facilities, Eqipment, Utilities			Physical segregation of activities (dedicated facility/area, use of closed systems, other containment systems,) / Barriers	4.2, 4.3, 4.4, 4.18, 4.19, 4.20, 4.21, 4.22, 4.23 8.10, 8.14, 8.15, 8.16	4.3 Use of barriers should be considered in the CCS: any alternative approaches to the <i>use of RABS or isolators should be justified</i>
and Infrastructure Design, Qualification, Maintenance and Control	Facilities		Localized Unidirectional Air Flow application/protection, dust control systems	4.2, 4.25 4.6	No potential gap
		Classification & Qualification of Facilities / Barriers	Qualification Program and control (AFPT, Air velocity)	4.15, 4.21, 4.26, 4.27, 4.28, 4.29, 4.30, 4.31, 4.32	4.28 & 4.31 develop the current section to explain how current strategy fulfills the requirement for the sampling locations and their positioning during classification " critical processing locations should be determined by a documented risks

Product information

- Physical characters: pH, oxygen, shear sensitive, light sensitive, heat labile
- Hazard level to operators
- Chemical compatibility to cleaning, fumigation, disinfection agents
- DS/DP compatibility to filter, housing, tubing
- Potential of ingredients to promote microbe growth

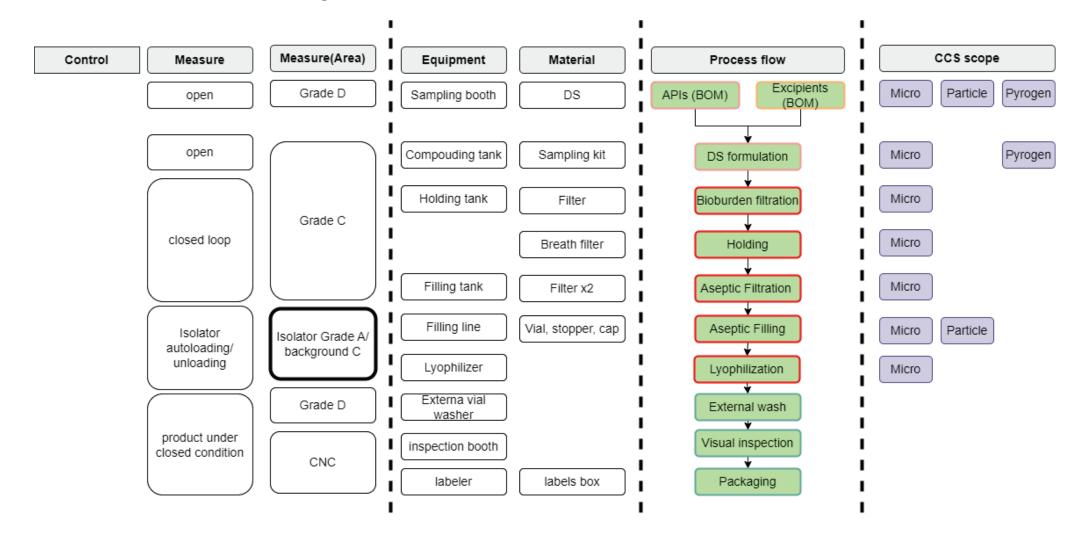
Develop process flow diagram

- Begin from broad spectrum (introduction chapter) then down do details (risk assessment)
- End to end approach by starting from the beginning and describe individual steps
- Include starting material, packaging material, compounding kits, sampling, filters...
- Visualize the flow and examine the potential risks (apply CCS scope)

想像APS的情境, e.g. 如果這樣執行APS模擬, 能夠通過嗎?

Determine CCP (critical control point) or CPP (critical process parameter)

Introduction 說明全流程的Flow Diagram,風險分析時展開流程中的細節,鑑別風險,控制與監測策略



CCS分項之發展

- Process control
- Facility and utilities
- Equipment
- Material & Container closure
- Personnel qualification in aseptic operation
- Environmental monitoring and trending
- Quality system

PDA TR90說明微 生物控制策略 之關鍵 4.0 The key element of microbial control program

- Microbial Ingress微生物的侵入__製程的理解
 - 微生物從哪裡來的? 原物料,環境,人員,水,空氣...?
 - 是怎麼進來的?取樣過程,原物料的傳遞,開放作業(包含設備組裝),環境(使用中的空調,水,氣),存放過程的密閉性,容器完整性,維護作業使用的器具....?
- Proliferation 微生物增長
 - 環境條件有利於微牛物增牛?
 - 製程條件有利於微生物增生?
- Persistence微生物持續存在
 - 清潔消毒的程序妥當嗎?
 - 環境監測計畫的完整性?是否真實反應出微生物數量與屬性的變化?(取樣點,方法,實驗室管理,提供數據的及時性)
 - 設備接觸的表面,潔淨設施提供的水,氣體,環境負荷菌是 否能被清除或是在管制中?

PDA TR90說明微 生物控制策略之 關鍵 4.1 Low bioburden drug substance process control

- 降低DS製程中的Bioburden 控制,尤其開放操作需要有Grade A的保護
- DS儲存條件; 特別對於冰存條件微生物孳生的機會
- DS的容器密封條件,必須有固定的扭力確認密封操作
 - Single-use-system (SUS) 需要由供應商提供無菌性確效
 - Single use bag 密封條件確認 (Annex 1 x.xx)
 - 冷凍存放條件對容器密封是一項挑戰
- 病毒及黴漿菌的污染較微生物的污染少見,但一旦有污染, 造成生產中斷,不得不小心應對
- 病毒通常存在於內源性的病毒,或是操作中被感染的細胞
 - 也有可能來自侵入設施的齧齒類鼠類病毒污染
 - 預防措施
 - 過濾包含0.1 micro filter也無法有效過濾病毒
 - 使用可靠的來源
 - 使用gamma過的培養基
 - 加熱滅活的培養基
- 黴漿菌的預防措施與病毒控制是相同的
 - 經由0.1 micro filter可以有效阻止
 - 黴漿菌具有抗藥性,培養過程過度使用抗生素,反而會增加黴漿菌污染的可能性
 - 前期的嚴密監測是預防措施的一部分

PDA TR90說明微 生物控制策略之 關鍵 4.2 Sterile product process control

- 控制bio-burden 方面,DP與DS有相同的考慮點,都需要設施與設備設計遵循良好的規範,採用密閉系統
- 確效製程中最常保持時間及控制方案
 - 儘量縮短保持時間
 - 以降溫方式保存可以有效降低微生物增生的潛在風險 >>對於半成品的特性,考量微生物增生的風險
 - 培養基以常溫保存,可以目視是否有微生物增生
 - 污染控制的主要的程序(例如,人員和材料進入製造區域、人員穿衣、設施清潔和消毒、設備滅菌、潔淨室行為培訓)
- 細胞擴增,發酵,培養
 - 在BSC內執行關鍵操作時,管理環境監測及人員監測
 - 操作菌種庫/細胞轉殖,BSC下的開放作業,無菌操作技術或是密閉系統
 - 培養基來源(來自植物或動物性原料是黴漿菌的可能污染源)
 - 使用heat or gamma radiation 處理培養基(若可行時)
 - 熱滅程式需要確效,無菌過濾需有過濾器完整試驗
- 純化
 - 製程中間階段收集的製品,增加過濾步驟,以降低生物負荷
 - 若可行,增加病毒清除步驟,並經確效。
 - 與產品接觸的緩衝液,建立產品中間製品等同的內毒素的限量管制標準。
 - 在層析管柱和超濾/滲濾膜使用及儲存期間的微生物控制
 - 確效層析管柱消毒程序和保存液方案的有效性 (詳見PDA TR 14)
- 無菌產品(參照Annex 1條文)
 - 避免無菌中間製品的風險 (包括取樣,保存時間,保存級區,容器完整性)
 - 過濾確效(PUPSIT),前期過濾器選用的微生物挑戰試驗(10⁷/m²)
 - 以worst case挑戰APS的執行計畫
- 無法過濾的無菌產品(e.g. ATMP)
 - 操作過程多為人工作業,必需要求採納無菌操作的手法
 - · 以最大可能,應用CCS的評估方法,降低污染從溶液,接觸的表面進入產品

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PDA TR90說明微 生物控制策略 之關鍵 4.3 Non-sterile product process control

- 液體和半固體的非無菌產品,如糖漿、乳膏和軟膏
 - 具備高水活性
 - 微生物污染可能引起效價降解,外觀變化,特定病患不良的影響
- 固體及粉劑雖然水活性低,但本身不具備防腐性
- 原材料是非無菌製劑中微生物的主要來源,尤其是製造用水
- 大型設備(桶槽)也是微生物污染的重要來源
- 設備(管路)使用後應充分清潔及乾燥,或定期消毒滅菌
- 非無菌產品的監測頻率一般比較低,但應該視產品屬性,用藥族群屬性,給藥途徑,管理原料來源及製程

PDA TR90說明微 生物控制策略 之關鍵 4.4 In-process monitoring

- 在整個DS和DP生產過程中控制和監測生物負荷和內毒素水準,是整個微生物控制 計劃的重要組成部分。
- 監測計劃應基於風險的評估。包括對易受生物負荷增長影響的潛在點,對污染風險的評估,以及該過程可減輕每種風險的能力。以worst case制定取樣計畫。
- 反覆出現的零星污染,可能表明設備的產品接觸表面存在生物膜或製程區域中普遍存在的環境污染。
- 繪製過程圖,整合微生物進入可能性,在無法降低污染的步驟建立取樣點。通常在去除負荷菌的前一個步驟需要採樣。
- 從環境監控數據歷史資料分析,顯示持續、擴散、難以消除的污染,與級區設計, 設備,製造流程,管線即閥件,一次袋使用,到高度複雜的生物培養反應器,建立 關聯的因子。
- 生物負荷計數通常較低且不呈常態分佈,因此不能使用典型的統計方法(例如,參數或 ±3個標準值)來確定有意義的限值。
- 應根據處理的類型和階段考慮檢測厭氧生物負荷。
- **多加利用內毒素檢測,可以為生物負荷監測提供補充資訊**,因內毒素結果可以在實驗室、在線或線上或在數小時內提供。
- 生物反應器後的半製品產物必須監測,並維持在單一菌種狀態。
- 過度監測除了成本過高,可能也是導致污染的風險。
- 基於歷史數據更新警戒水準,並要注意不利的趨勢。
- 關鍵區域(A/B)找到的任何生物都應調查。
- 預期的生物製品的負荷菌水準
 - 生物反應器 <10 CFU/10 ml (mammalian cell)
 - 發酵製程,菌種純度
 - 下游製程 <100 CFU/10 ml
 - DP 中間半製品 <10 CFU/100 ml, 取樣量依科學的基準調整
- 當發現的環境菌株具有蛋白質分解酵素能力,或產生毒素的能力時,需進一步以加速試驗評估對於產品的影響

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PDA TR90說明控 制策略之關鍵 5.1 Facilities

Facility design

- 不要認為環境監測的數據仍在可控的範圍下,便忽略設計不良造成的風險。
- 應根據 QRM 原則主動評估已知的設施和設備問題,以確定其控制措施的有效性

Personnel flow

- 人是潔淨室中微生物的主要來源,因此人員流動對於污染控制至關重要。
- 設計人員單向移動(best practice); 並防止不同級區的人員出現在相同級區下
- 如果無法避免,需用程序及控制手段

Material and waste control

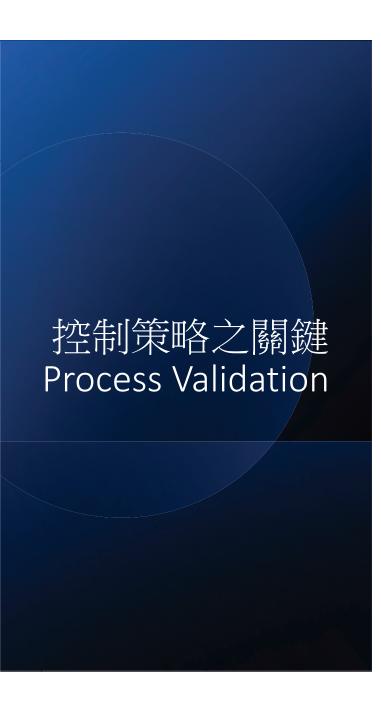
- 物流與廢棄物流須與人流分開,獨立的物流及廢棄物流可有效降低污染。
- 廢棄物區空間要足夠,或是與製造排程搭配,避免空間不足
- 物料外包裝是黴菌,微粒子的污染來源(包裝材料常帶有靜電會吸附微粒子)

• Pass and Air lock (Annex 1本次特別注重"傳送(transfer)")

- 注意材料及設備從低等級區移轉到高潔淨等級.
- 最好有獨立的人流,物流氣瑣室
- 進入與離開B級級區的氣鎖室最好能分開 (clean corridor, dirty corridor)
- 如果風險分析顯示有交叉污染的機會,進入生產級區與離開的人員更衣應該分開
- 人員氣鎖室設置洗手設施只有在第一階段的更衣室
- Aseptic preparation 級區的要求參照 para 8.10 table 4
- 廠房設施的清潔與消毒(有效性的確效)
- review Annex 1之相關條文



- 建議參照Annex 1 相關要求。
- 因為微生物檢測有其侷限,因此設施的物理性管制非常重要,可以預警 系統非典型趨勢
- 了解設備的設計,設定適當的警戒值,趨勢偏移時要啟動調查
- 水系統
 - 要將水系統視為固有的風險(支持微生物及生物膜的生成條件)
 - 在線的TOC, conductivity, 即時的負荷菌及內毒素監測也可以帶來快速的數據及趨勢
- HVAC
 - 氣流研究 (Unidirectional flow: visualization study; Turbulence flow: air flow pattern) 起始的qualification 及例行性requalification (可参照environmental monitoring)
 - 壓差設計及警報(視覺或聽覺),換氣次數(與工作人員,製程產熱產濕的條件有關)
- 氣體
 - 與產品接觸與非接觸的氣體
 - 水分監測(黴菌可以在更低的水分下生長)



- Aseptic process simulation (APS) also know as Medium fill
- 參照 Annex 1 9.32-9.49
- 參考ECS CCS Guideline
 - The concept of PV is described in SOP
 - The concept of continuous process
 - verification is described in SOP
 - Aseptic process simulation is performed according to SOP
 - PV-reports for manufacturing processes:
 - Aseptic process simulation reports (media fill reports)
 - Assembly, manipulation of sterile parts, materials, powder filling, liquid flling, lyophilization
 - PV-reports for cleaning processes:
 - PV-reports for decontamination processes:
 - PV-reports for depyrogenation processes:
 - Validation of sterilisation processes
 - · PV-reports for moist heat sterilization
 - PV-reports for dry heat sterilization, oven, tunnel
 - · PV-reports for sterilization by radiation
 - · PV-reports for sterilization by ethylene oxide
 - PV-reports for filter sterilization (PUPIT)
 - 可以評估與製程的 PV 報告合併於同一章節

PDA TR90說明控 制策略之關鍵 9.0 Equipment Design, Validation and ongoing control (Design)

- 設備是否為**儘可能是一個封閉的系統**,設備用於衛生用途的**材質、表面光滑且易於清潔**
- 固定探頭的位置,通過環境風險評估和氣流可視化研究確定不會引起擾 流
- 最大可能地減少設備關鍵區域的常規人為介入
- 隔離設備有聯鎖裝置,警示人員錯誤或不正確的動作。
- 無菌組裝過程以及動作的區域,容許操作員易於接近該區域(在隔離裝置或 RABS 中),以防止操作員俯身在開放的產品或元件
- 將部件組裝為一個單元滅菌,**將無菌組裝需求降到最低**。(如果分段滅菌要注意需有重疊的區段)
- 無菌通路在組裝過程中需被覆蓋,僅在最後才取下蓋子
- 僅能於無菌區域之外進行的機械和電子調整
- 管道和其他公用設施的安裝設計,不會產生凹槽或具有難以清潔的未密 封開口和/或表面
- 密封或墊圈的管道和管道的穿牆通道開口,不會暴露牆壁內部
- 所有設計都考慮排水坡度
- 通過排氣的過濾器允許排出的氣體,須滿足排放區的區域分類(例如, A級或B級)
- 高壓滅菌器或凍乾機上的破真空氣體須來自潔淨室,而不是從工廠區域 抽出
- 電子設備披覆表面需可使用消毒劑擦拭(例如,設備面板或鍵盤)
- 設備在儲存期間也需要被保護
- 確認所有關鍵運行參數的警報/操作警戒條件,以及警報的方式



- i. 產品與產品接觸表面之間的相互作用(如吸附,或可浸出物和可萃取物)。
- ii. 與固定的可重複使用的系統相比,系統的**脆弱性**。
- **iii.** 手動操作(包括系統的目視檢查和安裝)和**連接**的次數和 複雜性增加。
- iv. 組合的複雜性。
- v. 滅菌級的過濾器須執行使用前和使用後性能完整性測試
- vi. 孔洞和洩漏的風險。
- vii. 在打開外包裝時損害系統完整的可能性。
- viii. 顆粒污染的風險

PDA TR90說明控 制策略之關鍵 9.0 Equipment Design, Validation and ongoing control (control)

- 設備及部件使用前如何**識別和確認設備的清潔及去污狀態**?
- 操作員如何知道設備的清潔保持時間?
- 滅菌的儲罐和任何所含液體是否在正壓下保持或適當密封以防止微生物污染?
- 設備是否包含在預防性維護計劃中?該計劃是否包括軟性管路管理和更換?
- 當已滅菌的包裝或蓋子不是完整時,是否會丟棄或從該區域移走?
- 操作員是否有能力檢查無菌灌裝線設置,如果有破損或存在潮濕的狀態,即不使用這些部件?
- 元件、容器和設備的清洗、乾燥和滅菌之間的時間間隔?
- 操作員是否知道滅菌和使用之間的**保持時間**間隔是否合格?
- 在設備保存包覆或覆蓋之前,目視確認設備是否乾燥?
- 是否對將要滅菌/去熱原提供適當的保護覆蓋物,以便在**滅菌後持續維持無菌**?
- 已滅菌的設備或物品與未滅菌的是否明顯區別(例如,變色指示劑)?
- 無法通過進入 A 級空間(Autoclave, HEPA oven)進行滅菌的材料,是否至少在轉移到潔淨區域時允許去除外部包裝層?無菌表面是否僅暴露在關鍵區域?
- 髒的設備是否儘快移除,並在允許的時間內清潔?
- RABS的大門是否只在必要時和最短時間內打開?該**氣流的恢復時間**是否經 過確效?
- 設備移到存放區保存是否有規劃,以確保設備不會導致在返回製造區域時成為污染源?

PDA TR90說明控 制策略之關鍵 9.0 Equipment Design, Validation and ongoing control (maintenance)

- 定期設備維護是防止潔淨室環境控制系統(HVAC)和生產設備發生故障, 並確保潔淨室和設備維持在確效狀態的關鍵。
- 如果維護作業不當,維護活動也可能帶來污染風險,e.g. HEPA過濾器後面, 電氣而板。
- 根據故障模式和影響分析(FMEA)做出適當的設計選擇,以減少維護量或增加維護的便利性。
- 最佳維修方式是在分類區域附近建造一個灰色空間,允許接觸到設備,以最大限度地減少需在級區的維護人員和校正人員。
- **制定預防性和矯正性的維護的控制策略**可確保確效狀態、產品無菌性或污染 控制不受影響。
- 如果潔淨室的某些部分需要隔離進行維護,則可以考慮使用**臨時灰色空間外**罩(Temporary Gray Space Enclosure, TGSE),而不是關閉整個潔淨室。
- TGSE需要仔細的規劃,以確保落實監控措施,維護人員和承包商都須遵循。
- 在建立維護TGSE之前,應建立一個流程,以便在**完成這些活動後恢復該區域**
- 重複使用的部件需制定**常規目視檢查**;包括軟性部件(例如軟管、隔膜、墊圈、O形圈)、探頭、攪拌器、閥門和過濾器,反應表面(包括產品接觸表面),及早發現製程設備的紅銹或任何其他劣化。
- 管道和閥門的設計應防止蒸汽冷凝水聚集和可能導致污染的可能迴流
- 需整合評估變更控制,工作指令和其他流程改進,以確保其單個或累積的結果不會影響CCS

PDA TR90說明控 制策略之關鍵 Material

(原材料(包含與產品接觸的材料)會進入製程, 因此是重要的風險考量點)

- 原材料規格通常來自供應商,除了藥典規定外,應該視材料屬性,加工 屬性,(e.g. 如果是最終滅菌可能需要考慮內毒素控制),對應產品規格, 使用量等,制定原料的微生物管制及內毒素規格。
- 正式的風險管理輸出:監控供應商控制所需的微生物測試的類型和頻率
- 取樣應該在符合生產相等的級區下執行。取樣技術、位置、工具、方法和儲存。
- 無菌材料需要在無菌密閉環境下取樣。如果無法處理,已經取樣的包裝需要丟棄。
- 完整包裝的材料傳送需考慮外包的清潔,脫包,脫包後的廢棄物的區隔, 避免污染潔淨區域。
- 在購買用於GMP生產的原材料之前,應與供應商簽訂品質協定。評估供 應商的品質體系。
- 對於關鍵原材料,應特別注意供應商的製造流程和控制(例如,關鍵控制點的危害分析(HACCP)方法),代表性抽樣和適當的測試(包括樣品大小,位置和頻率),所有規格測試結果的趨勢以及良好的包裝和分銷規範。

PDA TR90說明控 制策略之關鍵 Starting Material Unique to Biopharmaceutical

- 生物性的起始材料應從經批准的供應商處採購。生物性的原料的污染控制類似於無菌產品製造所需的控制。(參照ICH Q5A)
- 主細胞庫與工作細胞庫管理:
 - 應在專用,密閉良好的環境下操作。
 - 要有充分可追溯的來源檔案
 - 如果是動物性來源,須確保沒有TSE,BSE的污染源
 - 需針對無菌性(或微生物材料的純度)進行測試,並確保不存在黴漿菌,細菌性內毒素和病毒污染
- 其他材料,如緩衝液和培養基,應評估污染風險。評估供應商的製造流程、規格和分析結果的趨勢,納入風險評估的背景資料。
- 一次性系統應考慮運送時具備額外的保護,以及阻隔污染的包裝。
- ATMP起始材料可以包括人類供應的體細胞或組織、儲存的人體細胞系、 病毒庫、病毒載體,以及其支持細胞系以及核酸。
- ATMP起始材料所需的污染控制水準應高於最終製品的水準。
- 一些起始材料可能不是藥典或GMP等級的,因此風險評估應該更需考慮來源,供應鏈,製造控制點,和分析測試相關的危害和控制。

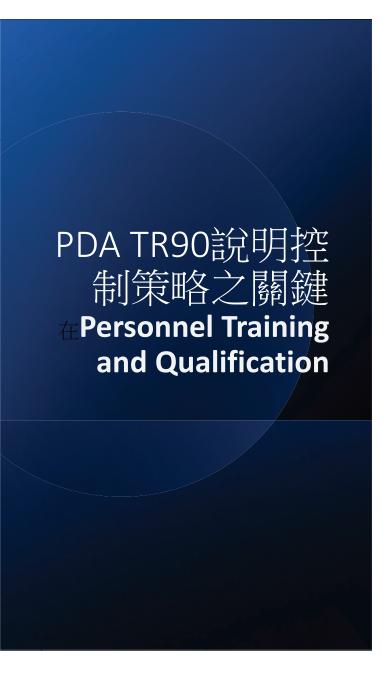
PDA TR90說明控 制策略之關鍵 Container & Closure Integrity (CCI)

- 包裝材料密閉性(CCI)的功能應涵蓋整個保存期限
- CCI的成功取決於在既定規格的公差範圍,供應商和供應鏈的資格至關重要。 供應商應與藥品製造商具備相同的品質文化。
- 容器和封蓋的清潔、去熱原、矽化和滅菌可能對材料造成壓力,須證明對於 CCI的影響。
- 如果成品為終端滅菌,可能影響CCI。製程參數確效範圍須涵蓋最大的暴露 值來證明 CCI。
- 小瓶封蓋過程直接對小瓶的頂部和側面施力,需將小瓶保持在適當的位置。
 施壓過程中的壓力過大可能會使小瓶破裂,壓力不足可能導致小瓶密封不良。
 製程參數需包括最高最低的組合。
- 採用吹-灌-封(BFS)技術的無菌產品,CCI應作為設備驗證的一部分。
- 預填充注射器和卡式二次組裝的過程,可能需要插入柱塞桿。組裝過程包括操作可能導致CCI失效;因此,應在二次組裝後進行CCI。
- 污染控制策略應納入最壞情況下仍可保持完整性的能力,例如冷凍儲存條件,
- CCI 可能會因運輸過程中的機械應力而受到影響,運輸確效計劃中應確認CCI 的功能。在**運輸研究期間,應探索由於物理或環境影響**(例如,溫度或壓力的變化)而導致物件之間物理阻隔中斷或晃動的可能性。
- 使用 ANSI/ASQ Z1.4-2008 或 ISO 2859 標準對物件的統計有效樣本量進行收貨 測試是確保 CCI的有效手段
- 在充填和完封過程中,可以考慮使用在線膠塞檢測器和其他 100% 測試技術等連續監控。
- 在充填線上以熔合密封(Fusion)的CC系統需要100%的完整性測試。

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PDA TR90說明控 制策略之關鍵 7.0 Environmental Control, Validation, and Monitoring

- ISO 14644中概述了潔淨室安裝和操作驗證,其中包括氣流可視化(煙霧)研究,應在靜態和動態(最壞情況或過程相關)條件下進行。
- 執行環境監測性能驗證 EMPQ 時生成的數據(classification and viable,支援 EM 計劃的建立,其中包括常規採樣位置的選擇。
- 製藥潔淨室的驗證規定乃依據ISO 14644-3"測試方法"(5)
- 環境監測的目的:確認環境控制狀況(e.g. HVAC老化),消毒的有效性 (e.g. 環境菌的變化),人員著衣驗證,無菌活動的管理,季節性的變化
- 附則1建議每6個月重新驗證A級和B級,每12個月重新驗證C級和D級。
- 級區驗證 Air pattern, air movement, air changes
 - Turbulence flow >>稀釋潔淨室中的顆粒和微生物
 - Air flow pattern 壓差方向,回復時間
 - Unidirectional flow >>確保 "First air" 在與產品接觸之前永遠不會受到污染
 - Visualization study: 擾流,停滯,遮蔽,通過鼠洞的流向,人員介入移動模式研究 >> 模擬顆粒的密度
 - 壓差設計及警報值: 視房間用途,產品毒性,生物活性,建立房室壓差
- 廠房級區與設施中斷的風險,高於一般常態的運作
 - 計畫性中斷,與非計畫性中斷
 - 建立圍堵與風險的對應策略



- 人員培訓和資格認證應至少包括對以下控制措施的基本原則和基本原理的解釋:
 - 1. 基礎微生物學
 - 2. 人員潔淨室活動、人員移動;包括氣流可視化研究中人員與first air的干擾
 - 3. 解釋人們及其行為如何被認為是製藥行業微生物污染的最大來源之一
 - 4. 著裝訓練,觀察磨損,材料,使用次數,更衣頻率,滅菌程序等
 - 5. 材料和廢物流
 - 6. 環境控制
 - 7. 清潔和消毒:包括對清潔和消毒之間區別的明確解釋
 - 8. 製程設計
- 基礎微生物學包含各種類型的微生物(最少,細菌,酵母和黴菌)。微生物如何通過污染(包括增殖),產生影響,以及它們釋放毒素(包括內毒素)的潛力、依據藥品的類型、患者群體和給葯途徑,影響患者安全。
- 潔淨服著裝認證:穿潔淨服後從服裝外部採集多個樣本,以證明是否存在任何微生物。並對人員著裝多次檢查。
- 制定文件化的計劃,以提供基於防護服技術不足和/或超過既定微生物上限和/或人員監測趨勢而取消人員進入潔淨室資格的標準。
- 如果被取消資格,恢復進入潔淨室將取決於符合適當的糾正措施並成功完成資格認證。
- 應每年例行對著裝作業重新認證,或從長期休假/長期缺勤中返回,以便人員證明其持續的潔淨服著裝能力。

PDA TR90說明控 制策略之關鍵 --Aseptic operation & qualification

- 無菌操作人員不干擾First Air,減少顆粒產生,避免不適當的接觸物件、表面,造成微生物侵入。
- 接受無菌操作的受訓人員,只有在成功參與無菌作業模擬(APS) 後才能執行生產中的介入動作。
- 除了培訓和資格認證/取消資格外,應設定無菌操作觀察員,定期監督人員遵循既定的書面程式,並在製造操作期間具備良好的潔淨室行為和無菌技術。
- 必須建立人員在潔淨室作業活動的規範:
 - 動作要慢,避免產生在關鍵區域產生擾流
 - 勿在關鍵區內談話
 - 維持單向流,使第一次氣流持續保護關鍵物品,無菌設備上方
 - 使用**正確的工具**進行無菌充填中的介入活動。包括RABS的開門
 - 控制潔淨室內的活動,避免汙染潔淨服,不要靠在牆壁,定期消毒或甚至 需更換手套。人員有能力判定無菌服是否有破損
 - 建立並依循組裝的操作程序,從上到下,後到前。使用的工具需要持續維持在A級區
 -

PDA TR90說明 控制策略之關 鍵 11.1 Trending & Metrics (品質指 標)

PDA TR 90提出有關Trending (趨勢分析)的做法,包含以下主要的KPIs。目的是為了使管理者可以一段時間的"預期性指標"及"對應性指標",看出控制方案的有效性

Table 11.1-1 Examples of metrics to be assessed during periodic review

預期性指標 (Predictive metrics)	對應性(Reactive metrics)
與品質文化相關的KPI e.g. 放行數據,客訴,失敗率	設施內CCS監測活動中的不符合結果檢討 (e.g. EM)
成本投入活動帶來的改善效益 (e.g. 新的控制或是測量技術)	製程活動中CCS的不符合結果檢討 (e.g. 原料, 製程, 熱原或Endotoxin level)
檢討經由品質風險管理(QRM)發掘的風險 降低結果	產品檢驗結果不符合的檢討(e.g. 無菌試驗 失敗)
CAPA的有效性,及時的應用	製程能力與設備表現
CCS相關計畫性的品質驗證及確效結果	各作業場所環境監測趨勢分析,偏差,根本原因分析,風險評估,如果趨勢有變差時,檢討調整方向
CCS相關計畫性的污染控制風險回顧	與汙染控制相關的偏差,包含控制失效, 訓練的差距,錯誤的知識訊息
CCS相關計畫性的維護管理活動	非計畫性的/矯正性的維護作業

PDA TR 90 Chapter 11 Quality Systems

11.5 Quality risk assessments

Table 11.5-1 Examples of Foundational Risk Assessments that Support CCS

	Contamination Control Elements	Risk Question	Risk Tool
		What is the risk of process contamination?	Process FMEA
製程	Process	What is the risk of cross-contamination between processes in a multiproduct facility?	Cross-contamination FMEA
訓練	Personnel	What is the risk of process contamination from personnel?	Process FMEA
廠房	Environment	What is the risk of process contamination from the environment?	Process FMEA
/MX//J			Monitoring HACCP
	Materials, Consumables	What is the risk of process contamination from raw materials and single-use consumables?	Process FMEA Consumables FMEA (for novel or high-risk items) Monitoring HACCP
	Containers	What is the risk of process contamination from final product containers?	Process FMEA
	Equipment	What is the risk of process contamination from equipment?	Process FMEA Equipment FMEA (for novel or high-risk items)
	Utilities	What is the risk of process contamination from product-contact utilities?	Monitoring HACCP
	Other	Other targeted risk questions, as needed	Multiple

PDA TR90 Chapter 12. 對於CCS 必須包含Governance Structure (治理結構)& Effectiveness Review (有效性的審查)相關說明

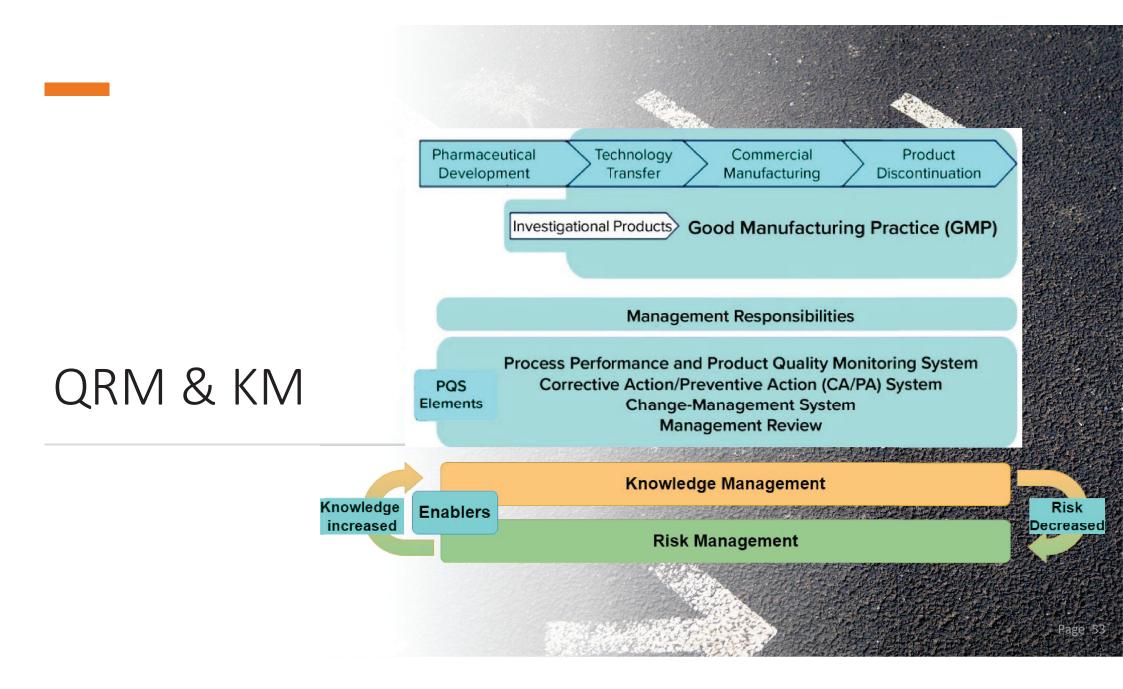
治理組織成員:

- 1. 具備適當的微生物專業及製程專家,理解這些監測數據與CCS的關聯性
- 2. 明確的負責單位,定期監測製程,產品,人員,廠房/設施/設備等汙染控制活動,提出積極的改善方案。
- 3. 具有主導能力,面對不良的趨勢,能決定預防性或是反應性的行動方案
- 4. 清楚的訊息傳遞路徑,能夠將資訊傳達到工廠治理的管理階層

定期審查:

- •至少要設定為年度審查,定期的會議
- 確保CCS執行的有效性,符合當今的法規規定,與時並進的技術評估與導入
- 為跨單位共同執行
- •評估內容包括(不限於)
- ✓品質趨勢 Trending 結果
- ✓污染事件, Investigation, CAPA, root cause
- ✓變更管理 Change control,
- ✓確效活動及結果,
- •CCS是一項產品生命週期管理活動,從開發階段即須導入(新產品,新製程引進,QbD)

A detailed CC level status helps to prioritize the strategic plans. **Water Systems Transport** Steam distributions 05 HVAC Third party 04 Gaz compressed House keeping **Autoclave** Gowning Personnel knowledge Continuity grade A Aseptic intervention Sterility assurance level Aseptic manipulations Cleaning Cleaning & disinfection Media fill simulation Decontamination Non-viable Change over Viable CCIT Sterility test Source: Walid El Azab, Contamination Control Strategy: Implementation Academy © ECA Academy – www.gmp-compliance.org Slide 55 Roadmap, PDA JST, March 2021, Your GMP/GDP https://journal.pda.org/content/early/2021/ Information Source 03/15/pdaipst.2020.012385



感謝各位參與本次活動

請分組小組長介紹小組主題,並展開該組的流程圖及需要檢討的風險

GAP analysis 分組討論

需使用Risk assessment tool 發展管制重點

組別	分組	Key element	Annex 1 ref.	Key support document/RA
1	Facilities, utilities design, cleaning & sanitization	i. a. Design of plantii. a. Premises (qualification, transfer)iv. Utilities (Water, PW, WFI, PS, Gases)xii. Preventative maintenance/alarm systemxiii. Cleaning and disinfection		
2	Equipment Design, cleaning & sanitization	ii. b. Equipment (process, storage, monitoring device)xii. Preventative maintenance/alarm systemxiii. Cleaning and sterilization (for SU, connection, sterility)		
3	Process Design	i. b. Design of processix. process risk assessmentx. Process Validation; (xi. Validation of sterilization process)		
4	Vender, Material, consumable and container	v. Raw material control vi. Product containers and closures (CCIT) viii. Management of outsourced activities and availability vii. Vendor approval and critical service providers		
5	Personnel training & Hygiene, gowning	iii. Personnel training (quality governance, gowning, manual operation, qualification/disqualification)x. Process Validation (personnel qualification in APS; airflow)		Page 55

CCS分組討論

組別	分組討論議題Key element	Key highlight
1	i. a. Design of plant ii. a. Premises (qualification, transfer) iv. Utilities (Water, PW, WFI, PS, Gases) xii. Preventative maintenance/alarm system xiii. Cleaning and disinfection	 i. Cleanroom design ✓ Cleanroom classification requirement, material flow and transfer ✓ Cleaning and disinfection of facility ✓ Preventative Maintenance (planned, unplanned) ✓ Disruption recovery (Planned, unplanned) iv. Utilites— water, gases, steam, support ✓ Specification, distribution ✓ Prevent micro built up (biofilm) ✓ Qualification and routine monitoring
2.	ii. Equipment (include barrier technology)ii. b. Equipment (process, storage, monitoring device)xii. Preventative maintenance/alarm systemxiii. Cleaning and disinfection	 ii. Equipment (SS tanks, autoclave, SIP, tunnel oven) ✓ Equipment design on slope, valves, drying, alarm ✓ Storage and maintenace (hold time) ✓ Cleaning and sterilisation of the equipment (vpreport ref. to xi) – requalification of cleaning procedure ✓ Disruption recovery (Planned, unplanned)

CCS分組討論

組別	分組討論議題Key element	Key highlight
3	i. b. Design of processix. process risk assessmentx. Process Validation; (xi. Validation of sterilization process)xi. validation of sterilisation processes	 i. Process design and control of microbial ingress ✓ Aseptic manipulation and intervention risk assessment ✓ APS result reconciliation ✓ PV-reports (cleaning, disinfection, decontamination) ✓ Lab control, OOS program, plant strain ID and use
4	v. Raw material control vi. Product containers and closures (CCIT) viii. Management of outsourced activities and availability vii. Vendor approval and critical service providers	 v. Material, intermediate, container and closure. ✓ Specification regarding micro control and endotoxin ✓ Vendor approval for key component suppliers, and critical service providers. ✓ CCIT validation ✓ Single Use Systems (particle, leachables, integrity)
6	iii. Personnel training (quality governance, gowning, manual operation, qualification/disqualification) x. Process Validation (personnel qualification in APS; airflow)	 iii. Personnel ✓ Personnel training, include inspection of barrier system, ✓ Personnel hygenine requirement, training, gowning, certificate, job training, including visitor ✓ Unidirectional flow visualization study (method, use, documentation)

無菌研習營 ~ 組別 & 小組長~

組別	姓名/職稱/公司
第一組	徐士恩 製造科股長/中國化學台南三廠
第二組	張瑞原 技術師/製造室主任/國衛院生物製劑廠
第三組	鄭婷宇 研究員/友杏生技
第四組	廖雅堂 品保經理/保瑞生技竹北廠
第五組	陳珈瑋 確效部副理/台灣東洋六堵廠