# Workshop on generation and use of Health Based Exposure Limits EMA, London, 20-21 June 2017

## Key expectations on inspection with regard to risk management of required organisational and technical control measures based on an established HBEL

Dr. Heike Carstensen & Dr. Beate Reutter, State Social Services Agency Schleswig-Holstein, Germany

SH
Schleswig-Holstein
Landesamt für soziale Dienste

# Preparation of Inspection (1)

Schleswig-Holstein
Landesamt für soziale Dienste

## Information to be provided by company

- Detailed plans of rooms / facilities with information on
  - *Personnel flow*
  - *Material flow*
  - *Room pressure cascade*
- List of products/APIs versus HBELs, equipment, rooms and facilities
- Risk related concept for prevention of cross-contamination (technical and organisational measures)

# Preparation of Inspection (2)

Schleswig-Holstein
Landesamt für soziale Dienste

## Review of list of products/APIs versus equipment and rooms under consideration of HBELs by agency

- *Manufacturing of highly hazardous products in dedicated equipment / room / facility*
- *Manufacturing of highly hazardous products in shared equipment / room / facility*
- *Risk for potential (accidental) cross contamination through common corridors and personnel and material air locks*

# Inspection – Premises & Equipment (1)

Schleswig-Holstein
Landesamt für soziale Dienste

- Clothing concept
  - *Design of personnel air locks*
  - *Handling incl. laundry / cleaning, change and especially storage of potentially contaminated clothing*
- Sampling of raw materials
  - *Location, protection, handling*
- Weighing of materials
  - *Handling of materials and equipment, cleaning of containers, extraction of dust*
- Transport of materials through common corridors and air locks
  - *Decontamination of outside of containers*

# Inspection – Premises & Equipment (2)

Schleswig-Holstein
Landesamt für soziale Dienste

- Type of equipment
- HVAC: pressure differentials
- Protection (technical) against uncontrolled spread of dust and aerosols in production
  - ➢ *Isolator technology, extraction systems for dust and aerosols / laminar air flow with controlled extraction of dust/areosols*

# Inspection – Premises & Equipment (3)

Schleswig-Holstein
Landesamt für soziale Dienste

- Cleaning of equipment
  - *Automatic / semiautomatic / manual - WIP / CIP / COP*
- Washing area
  - *Staging areas for dirty and clean equipment*
- Cleaning tools/equipment for rooms and/or equipment
  - *Shared vs. dedicated use of cleaning tools/equipment*
  - *Laundry or cleaning and storage of tools/equipment*
  - *If applicable use, cleaning, and maintenance of vacuum cleaning for rooms and/or equipment (local vacuum cleaners / centralized vacuum system)*

# Inspection – Documentation (1)

Schleswig-Holstein
Landesamt für soziale Dienste

- Cleaning validation
  - *Translation of HBELs into cleaning limits*
  - *Sampling technique: rationale for sampling (swabbing) locations, swabbing procedure and training of staff performing the sampling*
- Manual Cleaning
  - *Instruction, training and verification of manual cleaning*

# Inspection – Documentation (2)

Schleswig-Holstein
Landesamt für soziale Dienste

- Change Control procedure for
  - *Transfer of already manufactured product/API to different room and/or equipment*
  - *Implementation of new product/API to existing room and/or equipment*
- Acc. to German Drug Law Article 20 a company has to inform the agency about any change which is relevant for the MIA.
  - *A dossier is expected from a company for any change regarding transfer of already manufactured product/API to different room and/or equipment and implementation of new product/API to existing room and/or equipment.*
    *Besides other information the HBEL-calculation and a cross contamination risk asessment are requested and will be reviewed.*

# Thank you for your attention

SH

Schleswig-Holstein
Landesamt für soziale Dienste