2.6 SOP for Sampling during a GMP Inspection, GMP-032.

3. Definitions

3.1 PIC/S, Pharmaceutical Inspection Corporation Scheme — the international professional association of GMP inspectors.

4. Responsibilities

4.1 It is the responsibility of the National GMP Inspector to appoint the members of an inspection team and to ensure that they follow this SOP during inspections.

4.2 It is the responsibility of GMP Inspectors and specialists carrying out an inspection to follow this SOP.

5. Methods

5.1 The Head of the GMP Inspectorate shall appoint the members of each inspection team.

5.1.1 One inspector shall be appointed to head the team (should the team number more than one inspector).

5.1.2 Institute specialists will join the team as necessary, for example —

5.1.2.1 For biologicals — a biological products specialist;
5.1.2.2 A microbiologist from the microbiology laboratory;
5.1.2.3 A laboratory specialist from the Institute analytical laboratory.

5.2 One of the team inspectors will arrange the inspection date with the manufacturer and carry out the preparatory steps set out in GMP-049, the SOP for Preparing for a GMP Inspection.

5.3 Conduct of Inspectors during a Plant Inspection

5.3.1 The inspectors represent a government authority. They must dress accordingly and behave with courtesy.

5.3.2 The inspectors will follow local patterns of conduct and eating. In plants which provide lunch for their staff, inspectors shall eat together with plant staff.

5.3.2.1 In all other cases inspectors shall pay for their meals;

5.3.2.2 In inspections of remote plants in Israel, where the inspection lasts several days and inspectors stay in a nearby hotel, the inspected manufacturer shall not pay for the inspectors' hospitality.

5.4 Inspectors shall act according to Institute procedures for the confidential handling of information. All information discovered by or passed to the inspectors is confidential and shall not be disclosed to any outside person or body. Inspectors shall neither carry with
them written or printed materials relating to other plants, nor disclose any information relating to another company.

5.4.1 The inspectors’ task is not only to expose deficiencies. They must answer any professional queries put to them, while as far as a possible abstain from offering advice.

5.5 Inspections shall start with an opening session, at which plant staff set out the structure of the company and its key officials and the inspectors set out the inspection program.

5.5.1 At this opening session—
5.5.1.1 The inspectors shall identify themselves and describe their jobs;
5.5.1.2 The inspectors shall state which documents they need to study once they have completed their preliminary tour of the site.

5.6 There will be a preliminary tour of the site to allow the inspectors to get a general orientation of the site. It can take several forms, either following the flow of materials from storage to final product or following the flow of staff around the plant or any other form that suits the inspectors.

5.6.1 This preliminary tour should be no more than a quick overview: in general no detailed inspection should be done at this stage.

5.7 Over the course of the inspection the inspectors shall review all procedures, production and laboratory records, validations and any other record or documentation relating to production and control of the production process.

5.8 The inspection shall also include detailed tours of all production facilities, laboratories, stores, technical systems and the plant’s record and documentation centre.

5.8.1 The following specific issues shall be investigated, inter alia:
5.8.1.1 The suitability of the facility for its purpose, including the orderliness of its layout and cleanliness;
5.8.1.2 The production equipment —its calibration and cleanliness, preventive maintenance, daily maintenance records.
5.8.1.3 Whether production records are fully maintained and in real time.
5.8.1.4 Critical systems: air-conditioning, water, clean compressed air, sewage and drainage, any other relevant systems.

5.9 Inspectors shall talk to the staff who actually carry out the work and not make do with general answers from the quality assurance manager or production manager.

5.10 Samples may be taken during the inspection as the inspectors see fit. In taking samples inspectors shall follow SOP GMP-032. Details of the samples shall be entered on form GMP-032A and the samples taken for examination to the Institute laboratories.
SOP—Carrying out a GMP Inspection

Overview

Introduction
This SOP gives an insight into the guidelines to be followed by the GMP Inspection Unit – responsible for conducting inspections in Pharmaceutical manufacturing companies of medicinal products and active pharmaceutical ingredients (API).

Goal
The aim of the inspections is to evaluate compliance of the quality system and infrastructure with internationally accepted GMP (Good Manufacturing Practices) standards.

Audience
The SOP shall be followed by all Institute inspectors and specialists who carry out GMP inspections.

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Definition and Responsibilities

**Definition: PIC/S**  
**Pharmaceutical Inspection Corporation Scheme (PIC/S):** the international professional association of GMP inspectors.

**Responsibilities**  
The table below depicts the roles and associated responsibilities to ensure effective inspections:

<table>
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<th>Role</th>
<th>Responsibility</th>
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<tr>
<td>National GMP Inspector</td>
<td>• Appoint the members of an inspection team, and</td>
</tr>
<tr>
<td></td>
<td>• Ensure that they follow this SOP during inspections</td>
</tr>
<tr>
<td>GMP Inspectors</td>
<td>Carry out the inspection as per this SOP.</td>
</tr>
<tr>
<td>Specialists</td>
<td>Carry out the inspection as per this SOP.</td>
</tr>
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</table>
Guidelines for Conduct and Confidentiality

Conduct during inspection
The inspectors represent a government authority and must follow a code of conduct during plant inspections. They must:

- dress appropriately and display courteous behavior
- adhere to local norms of generic conduct and eating.

Specifically in eating:

<table>
<thead>
<tr>
<th>When a plant ...</th>
<th>Then inspectors shall ...</th>
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<tbody>
<tr>
<td>Provides lunch for their staff</td>
<td>Eat together with plant staff</td>
</tr>
<tr>
<td>Does not provide lunch for their staff</td>
<td>Pay for their meals</td>
</tr>
<tr>
<td>Is remotely located and the inspections last several days</td>
<td>Pay for their meals</td>
</tr>
</tbody>
</table>

Handling confidential information
Inspectors shall adhere to the Institute procedures of confidential handling of plant information. All information discovered by or passed to the inspectors is confidential and they must not:

- disclose it to any outside person or body
- carry any written or printed materials relating to other plants
- disclose any information relating to another company
**Inspection Method**

**Appointment of Inspection Team**
The Head of the GMP Inspectorate shall appoint:
- Members for each inspection team.
- Head of Inspection team – if the team has more than one inspector.
- Institute specialists – based on specific need. For example:
  - Biological products specialist - for biologicals
  - Microbiologist - from the microbiology laboratory
  - Laboratory specialist - from the Institute analytical laboratory

**Arranging an Inspection Date**
Once the team is defined, one of the team inspectors will arrange the inspection date with the manufacturer. They will also carry out the preparatory steps defined in **GMP-049-SOP-Preparing for a GMP**.

**Conducting the Inspection**
The inspection will begin with a preliminary tour of the site to allow the inspectors to get a general orientation of the site. It can be approached in any of the following ways:
- flow of materials from storage to final product
- flow of staff around the plant
- any other form that suits the inspectors

This preliminary tour should be no more than a quick overview. In general – no detailed inspection should be done at this stage.

*Continued on next page*
**Inspection Method, Continued**

### Conducting the Inspection, continued

Subsequently, over the course of the inspection the inspectors shall:

- review all procedures, production and laboratory records, validations and any other record or documentation relating to production and control of the production process, and
- include detailed tours of all production facilities, laboratories, stores, technical systems and the plant’s record and documentation center.

### Specific investigation areas

Inspectors shall investigate:

- the suitability of the facility for its purpose - orderliness of its layout and cleanliness
- the production equipment – its calibration and cleanliness, preventive maintenance, daily maintenance records
- whether production records are fully maintained and in real time, and
- critical systems: air-conditioning, water, clean compressed air, sewage and drainage, any other relevant systems.

### Method of inspection

Inspectors shall:

- talk to the staffers who actually carry out the work and not stop with general answers from the management - quality assurance manager or production manager
- not restrict themselves to only expose deficiencies, but must answer any professional queries put to them
- avoid offering advice
- if necessary - take samples during inspection to the institute laboratories asper the **SOP GMP-032**
- enter the details of the samples in **Form GMP-032A**.