MEDICINES CONTROL COUNCIL

DEPARTMENT OF HEALTH
Republic of South Africa

MEDICINES CONTROL COUNCIL

POST-IMPORTATION TESTING

This guideline is intended to provide recommendations to applicants wishing to submit applications for the registration of medicines. It represents the Medicines Control Council's current thinking on the safety, quality and efficacy of medicines. It is not intended as an exclusive approach. Council reserves the right to request any additional information to establish the safety, quality and efficacy of a medicine in keeping with the knowledge current at the time of evaluation. Alternative approaches may be used but these should be scientifically and technically justified. The MCC is committed to ensure that all registered medicines will be of the required quality, safety and efficacy. It is important that applicants adhere to the administrative requirements to avoid delays in the processing and evaluation of applications.

Guidelines and application forms are available from the office of the Registrar of Medicines and the website.

First publication released for implementation and comment	May 2003
Release for additional comment	November 2003
Deadline for comment	November 2003
Date for finalisation/implementation	December 2003

REGISTRAR OF MEDICINES
MS M.P. MATSOSO

POST-IMPORTATION TESTING OF MEDICINES

1 INTRODUCTION

The integrity of imported products could be compromised during transit. It is therefore important that the applicant confirms the imported product's integrity prior to release for sale in South Africa.

This should be done by:

1.1 Identification and assay and other relevant tests performed locally on the final product.

Or

1.2 Return of samples to overseas testing laboratories or the manufacturers that supplies the product for identification and assay and other relevant testing.

Note: The MCC prefers local testing of the final product and may recommend a local laboratory.

2 EXEMPTIONS RE POST-IMPORTATION TESTING

2.1 Exemptions to post-importation testing will be considered in the following circumstances:

2.1.1 When very small quantities are imported for "selected" patients, or groups of patients. A suitable motivation is required and a projection as to the annual usage of the relevant product.

2.1.2 If the identification and assay cannot be performed in South Africa the applicant should submit full justification and motivation.

2.1.3 Any other reason deemed by the applicant as being of such nature as to qualify for consideration for this exemption.

2.1.4 Continuous monitoring of temperature and humidity, where relevant of each shipment with validated monitoring devices according to SOP as well as performing a physical identification of the product.

2.2 Validity of approved exemptions

Exemption, if approved will be valid for three years (renewable thereafter) provided that all requirements are complied with.

3 GUIDELINES FOR MONITORING OF TRANSPORT

3.1 Monitoring of transport, that is, evidence that the conditions during transport are continuously monitored by temperature and, where relevant, humidity recorders.

3.2 The transport conditions (temperature and humidity, where relevant) of each shipment are recorded by a suitable device which provides a printout that will form a permanent record of the specific shipment and is filed with the batch release documents. Should the printout relate to different products of the same shipment, a QC certified copy of the print-out should be filed with the batch release documents.

3.3 An SOP, specifying the details of inclusion of the recorders, should be available for inspection. The procedure should include amongst others, the number of recorders, position of placement, date of activation and inactivation (on leaving the place of dispatch i.e. factory, and on receipt by the applicant i.e. warehouse) and evaluation of the printout with the reference to the stability data.

3.4 The monitor should be qualified and/or calibrated as applicable and relevant records should be available for inspection.

3.5 Please note that exemption is applicable only for shipments monitored and subsequently evaluated for compliance with the stability profile. Shipments not in compliance should therefore be identified and assayed and other relevant tests performed as stated in point 1 above.

4 SUBMISSION TO MCC FOR EXEMPTION BASED ON MONITORING OF TRANSPORT

4.1 A copy of the accelerated stability data of the formulation being applied for, packed in the final container as specified in MRF1 PART 3D / MBR1 Annexure 8 (to determine if the humidity should be monitored). The submission should include the necessary supportive stability data. If previously submitted, a statement to this effect will suffice.

4.2 The transport monitoring method, or transport conditions should be specified in the master release document.

4.3 A tabulated summary indicating the method of transport utilised and the conditions during transport as indicated below should be submitted. Data from a minimum of five printouts are required, giving an account of the same product or five different products, provided that the products require the same storage conditions, and provided that the products are dispatched from the same site but by different shipments.

4.4 A copy of MRF1 PART 3F / MBR1 Annexure 7A.

4.5 An indication as to whether the request is for bulk product or for the product packed in the final container.

4.6 A copy of the proposed master release document (MRD) in accordance with MRF1 PART 3F reflecting the specifications pertaining to the product in question (example attached). The MRD should include:

4.6.1 The type of recorder used in transit.

4.6.2 A specification that the received certificate of analysis is valid, is complete (reflects the actual results of the tests performed) and reflects compliance with the registration requirements.

4.6.3 Visual identification of the product and dosage form.

4.6.4 A consignment reference e.g. GRN (goods received notice) or invoice. (Batch numbers on the invoice should concur with the batch numbers of the products).

4.6.5 Confirmation of the integrity of the containers, seals, and labels. Each aspect should be specified and controlled to ensure that no damaged articles are accepted.

4.6.6 Outcome of the evaluation of the transport conditions and relevant action, i.e. further testing to be performed.

N.B. The Medicines Control Council reserves the right to withdraw the exemption, should the applicant give cause.

NAME OF PRODUCT:
REGISTRATION NUMBER:
DOSAGE FORM:
APPROVED STORAGE CONDITION:
ASSURANCE: TEMPERATURE RECORDED IN EACH SHIPMENT

Name of Product	Batch Number	Maximum and minimum temperature recorded	Maximum humidity recorded (Where relevant)	Duration of transport (Date commenced and date terminated)	Mode of Transport	Signature of responsible pharmacist who verified the printouts

Company

MASTER RELEASE DOCUMENT (MRD) **PRODUCT NAME:** EXAMPLE **Code:**	**Page ....of ..** **Date** **Supercedes** **of**

Batch number				
Approved storage conditions				
Final product specification reference number				
Receiving notice number (GRN)				
Dates of dispatch and of receipt				
Transit period specification, actual and conformity			**YES**	**NO**
Quantity dispatched				
Number of containers received				

Test	**Specifications**	**Result**	**Signature**
Temperature and humidity printout (storage conditions)	Present, attached; conforms to stability profile submitted		
Certificate of Analysis	Present, valid (batch specific), conforms to MRF1, complete		
Visual Identification	e.g. Product description, labelling, container, batch number, expiry date		
Shipping containers' condition	Clean, undamaged	Number approved, Number rejected	
Shipping container label	Untampered		
Shipping container seal	Present, intact		

Conclusion: Conformance	YES	NO	Further testing reqd?	YES refer to …..	NO
Comments					
Position/Function					
Signature			Date		

Originator		**Approved**		**Authorised**	
Designation		**Designation**		**Designation**	
Signature		**Signature**		**Signature**	
Date		**Date**		**Date**	