HEALTH SCIENCES AUTHORITY

REGULATORY GUIDANCE

01 MAR 2021

CLINICAL TRIALS GUIDANCE

INVESTIGATIONAL PRODUCT REPACKAGING ON SITE

GN-IOCTB-09 Rev. No. 002

HSA
Health Sciences Authority

PREFACE

This document is intended to provide general guidance. Although we have tried to ensure that the information contained here is accurate, we do not, however, warrant its accuracy or completeness. The Health Sciences Authority (HSA) accepts no liability for any errors or omissions in this document, or for any action / decision taken or not taken as a result of using this document. If you need specific legal or professional advice, you should consult your own legal or other relevant professional advisers.

In the event of any contradiction between the contents of this document and any written law, the latter should take precedence.

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REVISION HISTORY

Guidance Version (Version Date)

GN-CTB-2-003F-001 (02 May 2017)

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SUMMARY OF AMENDMENTS

- Amended the term “subjects” to “trial participants”

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1. INTRODUCTION

1.1. Purpose

The purpose of this guidance is to provide guidance for repackaging of Investigational Product (IP) on site.

1.2. Background

The background for this draws from our experience with conducting GCP Site Inspections since 2009, in which IP management remains a perennial stumbling block for many clinical trials. In lieu of this industry need, the Health Sciences Authority (HSA) is now adopting a pre-emptive approach in providing the necessary guidance to assist Sponsors and Investigators alike in complying with the Good Clinical Practice (GCP) and Good Manufacturing Practice (GMP) requirements for IP repackaging.

2. GOALS OF IP MANAGEMENT

The goals of IP management include the following:

(a) To ensure protection of the trial participant and product tracking;

(b) To ensure identification of the product and the trial;

(c) To facilitate proper use and storage of the product;

(d) To ensure the reliability and robustness of the data generated in the trial.

3. CONSIDERATIONS IN IP REPACKAGING PROCESS

3.1. Roles and Responsibilities of Study Staff

It is critical to delineate the roles and responsibilities of blinded and unblinded study staff involved in IP management, so as not to compromise the study blind for blinded clinical trials.

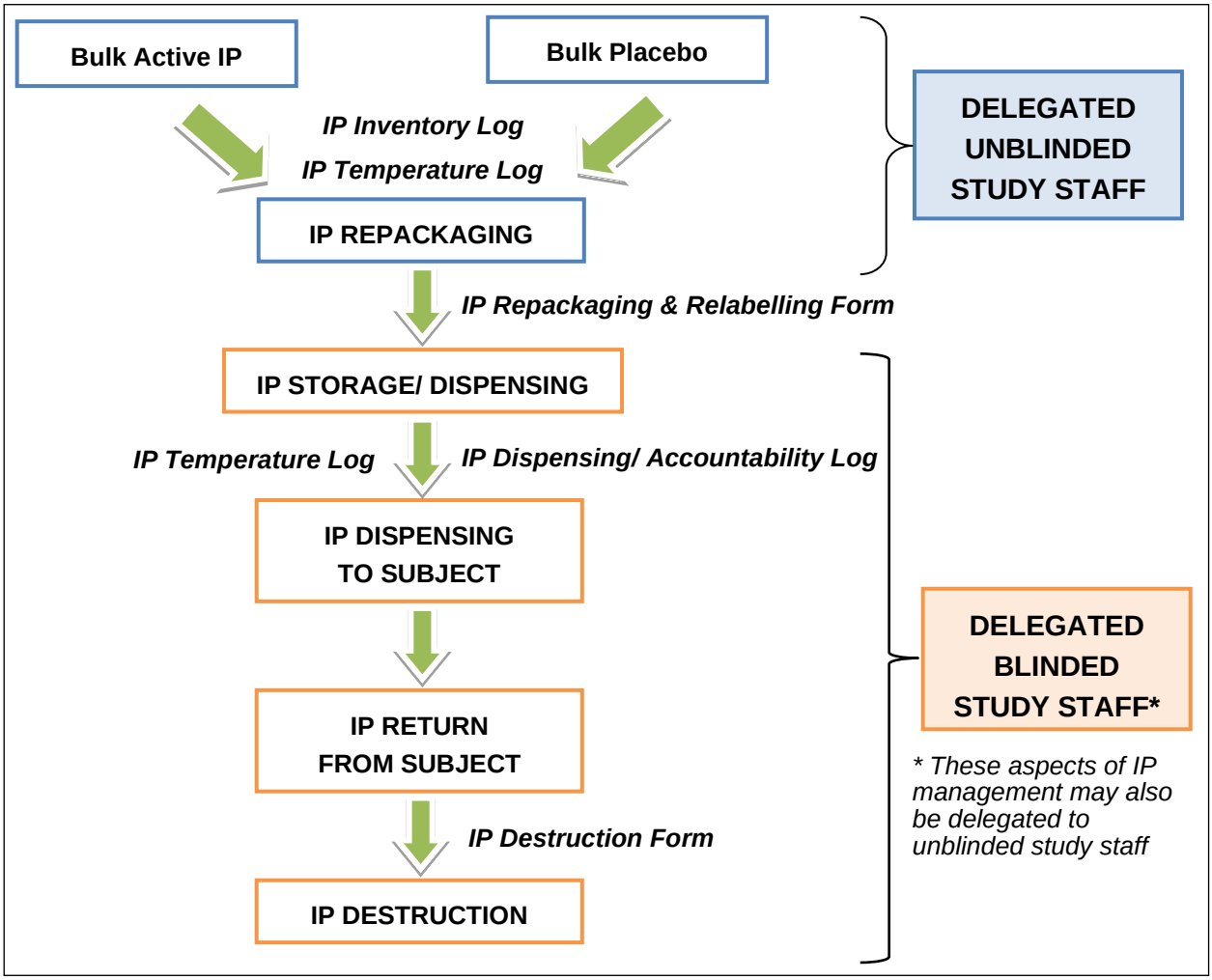
Unblinded study staff should be involved in the unblinded aspects of IP management (e.g. those concerning IP shipment receipt, storage of the bulk IP, repackaging and destruction), whilst blinded study staff should be involved in

blinded aspects of IP management (e.g. storage of the repackaged IP, dispensing, accountability, and return).

It is the Principal Investigator's responsibility to ensure that these roles and responsibilities are adequately documented on the Signed Signature Sheet.

Figure 1 summarizes the responsibilities of the unblinded and blinded study staff in IP management and the required documentation to be maintained.

Figure 1. Responsibilities of unblinded and blinded staff, and required documentation



3.2. Principles of Good Manufacturing Practice (GMP)

IP repackaging may be performed outside of a GMP-certified facility. However, the principles of GMP should be adhered to, where applicable.

Sections 23 to 25 PICS Annex 13 provide guidance on IP repackaging:

(a) Line clearance: Pack one type of IP at a time.

(b) In-process control checks: IP repackaging should be performed and witnessed by delegated and trained unblinded study staff.

(c) Label reconciliation : No. of IP labels issued = No. of IP labels used + destroyed + remaining; The IP Label must comply with the labelling requirements stipulated in the Medicines (Clinical Trials) Regulations [for medicinal products] and Health Products (Clinical Trials) Regulations [for therapeutic products].

(d) Documentation: The IP repackaging process should be documented and signed off by the unblinded study staff. It would be recommended to affix the sample IP label(s) onto this documentation for reference purposes.

3.3. Standard Operating Procedures (SOP)

The sponsor should develop written instructions for handling and storage the IP i.e. IP shipment, IP receipt, IP storage, IP repackaging, IP dispensing and accountability, IP return and/ or destruction, and unblinding procedures (Ref: ICH GCP 5.14.3).

The template forms for IP Management are available on the HSA website and may be customized in accordance to your protocol.

3.4. Documentation

The unblinded study staff should maintain the following IP documentation (unblinded documents) in a separate file on site with access secure and limited to the unblinded study team:

(a) Master Randomization List

(b) IP shipping documentation for each IP

(c) IP Inventory Logs for each IP

(d) GMP certificate / Certificate of Analysis (COA) / Product Insert for each IP

(e) IP Storage Temperature Logs

(f) IP Storage Temperature Excursion Report

(g) IP Repackaging and Relabelling Form

(h) IP Dispensing and Accountability Log

(i) IP Return and Destruction Form

The blinded study staff should maintain the following IP Documentation (blinded document) in the Investigator Site Files:

- IP Dispensing and Accountability Logs

4. REFERENCES

(i) Health Products (Clinical Trials) Regulations

(ii) Medicines (Clinical Trials) Regulations

(iii) ICH E6 (R2) Good Clinical Practice (GCP) Guidelines

(iv) Pharmaceutical Inspection Convention Pharmaceutical Inspection Co-operation Scheme (PIC/S) Annex 13 (dated Oct 2015)

HEALTH SCIENCES AUTHORITY

Health Products Regulation Group
Blood Services Group
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