



White Paper

## 10 common GMP challenges facing Maintenance departments in pharmaceutical plants

This white paper lists the GMP compliance problems often seen within the maintenance departments of pharmaceutical operations. These are the problems that will cause you grief when an auditor arrives. It is recommended that you identify, investigate and fix them before the auditor's next visit.

## Challenge 1

### **A risk-based approach to maintenance is not used**

It's common to treat every piece of equipment within a pharma plant equally when it comes to maintenance. A better way is to use a risk-based approach that classifies each piece of equipment in terms of its impact on product quality.

We recommend a simple four-category system for equipment:

#### **Direct Impact (Product Critical Equipment)**

Any equipment whose failure may directly impact or affect product quality

For example: a mixing vessel

#### **Indirect Impact (Process / System Critical Equipment)**

Equipment whose failure may indirectly affect process or system performance, thus affecting final product quality or safety

For example: the temperature monitor in an autoclave

#### **No Impact Equipment**

Equipment whose failure will not impact final product quality, safety or the environment

For example: the security boom gate at the site entrance

#### **Safety/Environmental Impact System**

Equipment whose failure may directly affect safety or the environment.

For example: a boiler

This categorisation system is detailed in the ISPE Baseline Guideline on Qualification and Commissioning, Volume 5, **Impact Assessment**. The **Direct**, **Indirect**, **No Impact** and **Safety** categories are sometimes referred to as the D.I.N.S. system.

Using a risk-based approach such as DINS can dramatically impact the amount of work facing a maintenance department. For example, your maintenance schedule may require that all temperature transmitters be calibrated annually. This is the same frequency for an autoclave as for the ambient air temperature measurement in a warehouse. Which one is more likely to impact product quality? The frequency of calibration should be determined during the validation or re-validation project phases. Using the risk-based categorization approach, the temperature transmitter in the autoclave may need calibration every three months, but the warehouse temperature transmitter may need calibration only once every two years.

## Challenge 2

### **Computerized Maintenance Management Systems (CMMS) are not utilised, are under utilised or are not validated**

A CMMS typically performs five GMP-critical tasks:

- a) Allocating a Unique Identifying Number (UINs) to each piece of equipment
- b) Describing the validated plant configuration
- c) Being the repository of maintenance plans
- d) Holding records of maintenance activities
- e) Scheduling maintenance activities

As consultants to the industry, we often see hybrid management systems within maintenance departments.

These hybrid systems may keep the UIN list in a spreadsheet, store the plans and records as paper files and schedule maintenance activities with a computer system.

Whenever a hybrid system exists, the computer system gets preference because it's easier. Paper systems are neglected and maintenance job sheets get lost. An auditor will target this area because it's often difficult for companies to get right. Our advice? Use a validated CMMS system.

Validation should be included in the budget for any CMMS. When using a risk-based approach to validation, you need validate only the five GMP-critical tasks listed above – not the whole system. An unvalidated CMMS is not defensible during an audit, so if you can't afford validation you may as well forget the whole thing.

## Challenge 3

### **Maintenance plans are not updated as part of new equipment introduction**

Buying a new piece of hi-tech machinery is very exciting. All the engineers scramble to be the first one to stroke its gleaming steel. Amongst all that excitement, the fact that this newbie has to be maintained is often neglected. Updating the maintenance plan should be included as an activity in the procedure covering new equipment installation.

*Buying a new piece of hi-tech machinery is very exciting.  
All the engineers scramble to be the first one to stroke  
its gleaming steel.*

## Challenge 4

### **Maintenance staff and contractors are not trained properly**

Do your maintenance workers and contractors know the impact of changing a setting on a piece of production equipment? Do they understand the concept of a validated state? Do they know when to involve QA?

Let's face it – maintenance staff would rather watch 15 hours of snail racing on TV than complete paperwork. It's hard enough to get them to complete maintenance records, let alone Change Control forms. Yet simple maintenance activities such as changing filters or adding lubricant can dramatically impact product quality.

The GMP regulations require all contractors to be trained appropriately before they enter GMP areas. Developing tight, long term relationships with your contracting suppliers is critical. Their HR systems should trigger GMP training for every new hire. You could request that small contracting companies use a simple checklist when a new hire commences work. "GMP training" could be on that checklist.

## Challenge 5

### **The GMP impact of lubricants is not considered**

When we ask the question, "What affect do your lubricants have on product quality?", we frequently get a puzzled look and a shrug. Lubricants are often ignored in terms of their GMP impact. Yet they can have direct contact with the product and, as such, are considered GMP-critical. Make sure that lubricants are on your criticality assessment list. The assessment and impact of lubricants on product quality should be documented. The introduction of new lubricants should be assessed and documented. Bottom-mounted or indirect drive systems used in plant design are strongly recommended.

*A plant lost a batch worth half a million dollars after an uncontrolled filter change. Maintenance replaced the filter during scheduled maintenance. Due to poorly documented maintenance plans, it was not checked. Product was filtered and packed, and only later was it found that the filter's pore size was 2 µm, not 0.2 µm. the error was found before release and distribution. The batch was disposed of. A simple error, but easy to prevent.*

## Challenge 6

### Maintenance of utilities and supplies falls between departmental cracks

The not-so-glamorous end of the maintenance activity list includes:

- chemicals
- power supplies
- fire protection systems
- security systems
- HVAC
- water and gas supplies.

Make sure it's clear who manages all this non-production equipment. Too often these items fall into the cracks between departments. The finger pointing starts when things go wrong and the cracks are revealed.

We recommend that "who is responsible for what" be documented in the quality system.

## Challenge 7

### Maintenance activities are undocumented

Policies, procedures and work instructions should exist for all maintenance activities. These documents form an essential training resource for maintenance staff and contractors. This documentation will also be requested by auditors, who know that maintenance is a GMP-risk. They will ask to see documentation that describes the what, when and how of maintenance. Make sure that you have it and that it's followed. It's worthwhile to get a professional technical writer to produce this documentation; this will ensure that the documents are useful and understandable.

Use a risk-based approach to prioritise the documentation needed. The highest risk occurs during times of change, including projects and annual shutdowns. Start by documenting how these are handled.

The documentation system **must** be kept simple. Say what you are going to do and do what you said. The auditors will ask staff to "show me," so if the documentation says that you do it, they will ask to see proof of it. They have a practiced eye to detect impractical systems and drill down. You don't want to be at the bottom of the drilling.

*Auditors have a practiced eye to detect impractical systems and drill down. You don't want to be at the bottom of the drilling.*

## Challenge 8

### **Modern maintenance management techniques are not used**

It's easy to keep doing things the way you've always done them – particularly with daily pressures to manage. With a few exceptions, we've seen little adoption by pharmaceutical plants in Australia and New Zealand of maintenance best-practice techniques. Total Preventative Maintenance (TPM) is one we recommend, as well as Condition Based Monitoring (CBM) and Lean Maintenance. With both GMP and your company's expectation that you are continuously improving your processes, we recommend that you get some training in these techniques or call in a consultant to help.

## Challenge 9

### **Equipment documentation is not readily accessible**

The ideal here is that all the documentation for a piece of equipment should be in the hands of the maintenance technician before he starts work. Extra marks if he's read it! This documentation includes:

- The manufacturer's operation manual
- The manufacturer's installation manual
- The manufacturer's service manual
- Details of the validated state of the equipment, e.g., settings used
- Any maintenance records
- Any work instructions or procedures covering the use of the equipment
- Engineering drawings
- Process and instrument diagrams

The ultimate system would be to have controlled electronic copies of all these documents that the technician calls up from a wireless tablet PC. Realistically, you are more likely to have paper-based documentation stations within the plant. We recommend that you assign someone to keep manufacturers' documentation up to date (often a simple web search & download). This person can also make photocopies of documentation (never let maintenance staff walk off with the originals) and issue uncontrolled copies of quality documents as needed.

*Tip: Bookmark the support section of each manufacturer's website on the PC in the document station. This makes it easy for technicians to find the information they need to solve a problem with a piece of equipment.*

An auditor typically selects three pieces of product-critical equipment and asks to see the maintenance records for them. If the records state, "*Preventative maintenance performed per manufacturer's recommendations,*" the auditor may ask to see what those recommendations are. At this point, it's more convincing if you have the latest copies of the manufacturer's documentation on hand than if you don't.

## Challenge 10

### **Maintenance is not considered during equipment purchases**

The maintenance department is often at the bottom of the heap when it comes to selecting new equipment. The production engineers and product development scientists base their selection on criteria such as through-put and ease of cleaning. The ease and impact of maintenance also need to be on the list.

Let's say you have a choice between two products for a clean room. They are pretty well equal on most selection criteria, but one is installed completely inside the clean room. The other has its maintainable "bits" outside the clean room, and only its product-contact components are inside the controlled area. Which one are you going to buy? The second one, because any maintenance tasks performed on it are unlikely to threaten the validated state of the clean room. The tasks will also be much quicker and easier to complete than if they had to be performed inside the clean room, making the cost of owning that equipment less than the other choice.

## **References**

- 21 CFRs, Parts 210 and 211
- The Draft ISPE BASELINE® GUIDE, Volume 8, MAINTENANCE
- FDA, Guidance for Industry Sterile Drug Products Produced by Aseptic Processing — Current Good Manufacturing Practice, August 2003
- FDA Guidance for Industry, Quality Systems Approach to Pharmaceutical cGMP Regulations, September 2006

## About PharmOut

PharmOut is a boutique consultancy to the Pharmaceutical, Medical Device and Veterinary drug industries.

PharmOut specialises in GMP compliance, validation and continuous improvement consulting and training.

Some of the company's customers include ASTRAZENECA, Bernafon, CSL, Fonterra, GSK, Hospira, Invetech, Intertek Caleb Brett, Mayne Pharma, Pharmatel Fresenius Kabi and Probe Analytical Laboratories.

## How PharmOut can help

We offer a range of services to help ensure compliance within the maintenance department:

### **Review of maintenance practices**

We will come onsite and compare your practices against international regulatory requirements and the draft ISPE Baseline guideline. Our final report will detail our findings and recommend needed actions.

### **Continuous improvement of maintenance practices**

Our consultants can help you evaluate your maintenance practices and adopt industry best practice techniques, such as Total Preventative Maintenance (TPM) and Condition Based Monitoring (CBM).

### **Validation of CMMS systems**

We can supply computer system validation professionals to help you validate your CMMS. This can range from high-level help with writing the validation plan to simply supplying a body to do the validation tests.

### **Selection of CMMS systems**

We can supply experienced professionals to help you determine your requirements for a CMMS. They can identify and assess suppliers to recommend a system/vendor to meet your needs. Often one of the benefits of this process is a re-engineering of your maintenance practices.

### **Documentation of your maintenance procedures**

You wouldn't ask a QA person to fix an autoclave, so don't ask your maintenance engineers to write quality documents. PharmOut can supply experienced technical writers who will extract the information from your staff (using whatever means necessary!) needed to write documents that your staff (and the auditors) can understand.



[www.pharmout.com.au](http://www.pharmout.com.au)