HEALTH SCIENCES AUTHORITY

REGULATORY GUIDANCE

**DECEMBER 2023**

# GUIDANCE NOTES ON PREPARATION OF A SITE MASTER FILE FOR GOOD DISTRIBUTION PRACTICE CERTIFICATION

HSA
Health Sciences Authority

A Site Master File (SMF) is a document prepared by the company containing specific and factual Good Distribution Practice (GDP) information about the storage, transportation and distribution of Active Ingredients, Therapeutic Products, Cell, Tissue and Gene Therapy Products (CTGTP) and CTGTP starting materials and health products which are used as clinical research materials, collectively referred to herein as “products”. If only part of these operations is carried out on the site, the SMF needs only to describe those particular activities, e.g. storage of products, etc.

## HOW AND WHEN SHOULD A SITE MASTER FILE BE SUBMITTED?

A SMF should be concisely written in English and, as far as possible, not exceed 25-30 A4 sheets.

The SMF should be a part of the documentation belonging to the quality management system. The SMF should have an edition number, the date it becomes effective and the date by which it has to be reviewed. The sheets should be paginated and secured to ensure the integrity of the document. Wherever possible, simple plans, outline drawings or schematic layouts are preferred instead of narratives. These plans, drawings etc., can be in a larger format to ensure legibility.

The document may be submitted as soft/electronic copy, preferably in readable format (e.g. doc, txt, pdf extension). Image files (such as tiff, jpg extension) may be accepted. The file size of the submitted SMF should be less than 2 MB while maintaining legibility.

The SMF should be subject to regular review to ensure that it is up to date and representative of current activities. Each Appendix in the SMF can have an individual effective date, allowing for independent review and update. Submission of the latest version of the SMF is required upon voluntary application for the GDP Certification. Subsequent updates to the SMF need not be submitted unless upon request by the Health Sciences Authority.

## CONTENT OF SITE MASTER FILE

## 1. GENERAL INFORMATION OF THE COMPANY

### 1.1 Contact information of the company

1.1.1 Name and official address of the company;

1.1.2 Names and street addresses of the site, buildings and warehouse units located on the site;

1.1.3 Identification number of the site as e.g. GPS details of the site, D-U-N-S (Data Universal Numbering System) Number (a unique identification number provided by Dun & Bradstreet), or any other geographic location system;

1.1.4 Contact information of the company including 24 hrs telephone number of the contact personnel in the case of product defects or recalls.

### 1.2 Description of the site

1.2.1 Provide a map (Appendix 1) indicating the location of the site(s) and the surrounding area. Mark the site(s);

1.2.2 Short description of the site e.g. describe the size of the site, type of buildings and their age;

1.2.3 Description of the surrounding area and use of properties nearby.

### 1.3 Authorised activities of the site

1.3.1 Information of the relevant licence(s) issued by the Competent Authority, including the validity period and any conditions and/or restrictions to the licence;

1.3.2 Brief description of import, export, distribution and other activities as authorised by the relevant Competent Authority;

1.3.3 Type of products currently handled;

1.3.4 If Active Ingredients are handled, provide information on the source/ approved suppliers for the Active Ingredients (Appendix 4);

1.3.5 Other sites (if any).

### 1.4 Toxic, hazardous or highly sensitising substances handled (if any)

1.4.1 Type of toxic, hazardous or highly sensitising substances handled, specifying if the substance is handled under a contractual agreement with a contract giver;

1.4.2 Description of how such substances are handled and precautions taken.

### 1.5 Any other operations carried out on the site

Description of non-pharmaceutical activities on-site, if any.

## 1.6 Employees

1.6.1 Organisation chart showing the arrangements for key personnel such as senior management and Responsible Person(s) involved in the GDP activities if any (Appendix 2);

1.6.2 Number of employees engaged in administration, warehousing, distribution and transportation, Technical & Engineering Support Services and the total number of the above, indicating part-time or full-time.

## 1.7 Outsourced activities

Name, address, telephone number and the activity undertaken by each of the contract acceptors.

## 1.8 Quality management system

1.8.1 The company's Quality Policy;

1.8.1.1 Brief description of the elements of the quality management system (e.g. organisational structure, responsibilities, procedures, processes);

1.8.1.2 Responsibilities related to the maintaining of quality system including the responsibilities of the senior management;

1.8.1.3 Description of the audit programmes (e.g. self-inspection or audits by external organisations undertaken);

1.8.1.4 Description of how audit criteria are selected and results are reviewed to demonstrate the adequacy of the quality management system in relation to the objective i.e. quality and integrity of the product. (see also Chapter 7 of this guide);

1.8.1.5 Record if other standards such as ISO 9000, etc. are used by the company.

# 2. PERSONNEL

## 2.1 Qualifications, experience and responsibilities of key personnel

Brief description of academic qualifications, work-related qualifications and years of relevant experience as well as job descriptions for key personnel (e.g., Responsible Person, Head of warehouse and distribution activities, Quality Assurance Manager etc). State the names of these key personnel.

## 2.2 Personnel training

2.2.1 Description of the training programme including induction and continuous training, as follows:

(a) Explain how training needs are identified and by whom.
(b) Give details of training relative to GDP requirements.
(c) State the form of training e.g. in-house, external, etc., and how practical experience is gained and which staff are involved.

(d) Explain how the effectiveness of training is assessed e.g. by questionnaire.
(e) Explain how re-training needs are identified.
(f) Explain how training records are maintained.

## 3. PREMISES AND EQUIPMENT

### 3.1 Layout of premises

3.1.1 Provide a site layout plan highlighting all storage areas, other functional areas and special areas for the handling of highly toxic, hazardous and/or sensitizing materials labelled with the name/purpose of each area. The material flow of highly toxic, hazardous and/or sensitizing materials should be indicated. (To be placed in Appendix 3 of the Site Master File);

3.1.2 Description of the controls available to prevent unauthorized access for the site and/or areas.

### 3.2 Ventilation systems

Brief description of ventilation systems e.g. air-conditioning systems.

Note 1: More details should be given for critical areas, e.g. cold room, freezer room.

Note 2: To reduce narratives, schematic drawings should be used.

### 3.3 Equipment

3.3.1 A list of equipment used by the company to maintain cold chain storage conditions and their corresponding storage conditions (e.g. standalone refrigerators, freezers, validated shipping containers, etc.).

3.3.2 Brief description of the system (i.e. electronic, manual) used by the company to monitor the storage conditions of the storage areas.

### 3.4 Maintenance

Brief description of the planned preventive maintenance programme:

(a) Explain who is responsible for planned preventive maintenance (carried out by the company) and servicing (carried out by an outside contractor).
(b) Explain the written procedures and contractual details for outsourced work.
(c) Explain the written procedures and reporting forms for maintenance and servicing including the information such as type/frequency of service/checks, details of service, repairs and modifications.
(d) Explain how the maintenance that could affect product quality is identified.
(e) Explain how the maintenance reports are made known to the users.

### 3.5 Cleaning

Brief description on the cleaning activities for the warehouse, storage areas and relevant equipment (e.g. delivery vehicles, forklifts, etc., if any):

(a) Explain if there are written procedures for cleaning and specifications for cleaning agents and their concentration for the method of cleaning and the frequency of cleaning.
(b) Explain the cleaning methods and their frequencies.

### 3.6 Policy on the storage of products

3.6.1 Segregation and control of the products of different statuses (e.g. quarantine, rejects, approved, etc.).

3.6.2 How products are stored e.g. stored on pallet or racking.

3.6.3 Storage conditions and controls for narcotic and psychotropic substances, if any.

3.6.4 Brief description of the pest control programme including the types of pest that are being controlled.

## 4 STOCK HANDLING AND STOCK CONTROL

### 4.1 Arrangements and recording system for receipt and distribution

4.1.1 Description of receiving, handling and storage of products:
(a) Type of checks conducted on the products
(b) Despatch order using first expiry first out (FEFO), or for Active Ingredients, first expiry or retest date first out and identify the lot number
(c) Methods of distribution to customers
(d) Handling of rejected products

4.1.2 Records of Receipt and Distribution permitting full batch traceability from the supplier to the customer in terms of the date of sale, customer details, name of product and quantity despatched.

4.1.3 Stock take procedure including the information on how it is conducted and its frequency.

4.1.4 Measures used to verify that each customer/recipient is legally entitled to supply or receive the products and that the products are genuine and not counterfeit.

### 4.2 Deliveries and transportation

4.2.1 Description of how the security, storage condition and protection of the quality of products are considered during transportation.

4.2.2 Description of the vehicle fleet available.
(a) Number of vehicles and their capacity.
(b) Is the vehicle dedicated? (e.g., for deliveries of products only).

(c) How the vehicle(s) is (are) specially adapted to transport special products (e.g. cold chain products, radioactives, CTGTP).
(d) How transport routes are planned.

## 5. DOCUMENTATION

### 5.1 Document control

5.1.1 Brief description of the documentation system (i.e. electronic, manual);
5.1.2 Brief description of the arrangements for the preparation, review, revision, distribution and retention of necessary documents, including storage of master documents;
5.1.3 Brief description of when documents are stored or archived off-site: List of types of documents/records; Name and address of storage site and an estimate of time required to retrieve documents from the off-site archive.

### 5.2 Any other documents related to product quality which is not mentioned elsewhere

5.2.1 Computer Programme Specifications
(a) Access to the system (internet, intranet) and the authorisation for granting access
(b) Handling of audit trail and the frequency of review
(c) Backup procedures
5.2.2 Calibration
5.2.3 List and briefly explain the use of any additional standards or references used routinely.

## 6. PRODUCT COMPLAINTS, PRODUCT RECALLS AND RETURNED PRODUCTS

### 6.1 Product Complaints

6.1.1 Brief description of the system for handling product complaints:
(a) Explain who is responsible for logging, classifying and investigating complaints.
(b) Explain how written records are prepared.
(c) Explain who reviews these records.
(d) Explain how long these records are kept.
(e) Explain if there is any electronic system used to document and track complaints.

### 6.2 Product Recalls

6.2.1 Brief description of the system for handling recalls, including who is responsible for coordinating product recalls and who notifies the Competent Authority of recalls. Describe the sequence of actions to follow including:

(a) Retrieval of distribution data;
(b) Notification of customers;
(c) Receipt/segregation/inspection of returned products;
(d) Investigation/reporting of cause;
(e) Reporting corrective action.

### 6.3 Returned Products

Brief description of the system for handling returned products including who assesses/evaluates the returned products, how they are evaluated, and what are the possible final disposition statuses of the returned products.

## 7. SELF-INSPECTION

Brief description of the self-inspection system with focus on criteria used for selection of the areas to be covered during planned inspections, practical arrangements and follow-up activities. Explain the frequency of the self-inspection and by whom it is conducted.

## 8. CONTRACT ACTIVITIES

Brief description of the technical contract between the contract giver and acceptor and the way in which the GDP compliance, or compliance with other appropriate standards, is assessed. The selected standards should be assessed for the suitability of its application. The type of activities undertaken by the contract acceptor should be specified.

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Appendix 1 Map indicating the location of the site(s) and the surrounding area
Appendix 2 Organisation chart
Appendix 3 Site layout plans marking out the different areas used in GDP activities
Appendix 4 Information on the source/ approved suppliers for Active Ingredients

## REFERENCE

1. PIC/S PE 008: Explanatory Notes for Pharmaceutical Manufacturers on the Preparation of a Site Master File
2. Health Sciences Authority Guidance Notes on Good Distribution Practice (GUIDE-MQA-013)

## END OF DOCUMENT

HEALTH SCIENCES AUTHORITY

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Applied Sciences Group

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