

FDA 21 CFR Part 11: How does Collette tackle this?

The FDA guideline '21 CFR Part 11' regarding electronic records and electronic signatures has caused a lot of concern in the pharmaceutical industry. As most modern equipment is controlled by electronic systems, most pharmaceutical companies have turned to their suppliers with the request to prove that these control systems are compliant to this guideline. Collette has also been confronted with this question. This article is intended to briefly present the Procoll Pro system Collette is using and the major steps taken in response to this question.

The Procoll Pro System is a closed system, based on iFix and iBatch (Intellution®), which is designed to be compliant to 21 CFR Part 11. More specifically this means that all the technical possibilities are supplied to enable the customers to make the system compliant to the guideline if they complement it with the appropriate SOP's.

The first important issue in the guideline that has been addressed by Collette is the security issue. The guideline requires that the system should be built around unique users, that passwords have to be of a certain length, that there is an auto-expiring system for passwords, etc. As these features are not directly provided in the iFix software, a solution had to be found to make the system designed to be compliant. The solution Collette offers is to control the password administration on Windows NT/2000 level, which does offer these features. This solution is feasible because the iFix software allows the use of the NT/2000 security. Next there is the requirement for audit trails on all electronic records. One of the requirements here is that at least 2 persons are needed to reach the raw data. This issue is tackled in the Collette system by storing all



electronic records as ntfs-partitions. In the iFix software, only the system administrator can access the Windows NT/2000 level, but in this level he has no rights. To be able to reach the electronic records, the Windows NT/2000 system administrator has to be called in.

Another issue related to the audit trails can be found in the recipe administration. When a recipe is created, the system automatically logs who created it, when it was created and there is a possibility to fill in why it was created. When this recipe is changed, the system will automatically change the version of the recipe and log who changed it, when and why. The old recipe is still available as the previous version. The requirements for an audit trails (who, what; when and why) are thus automatically stored in the recipe.

The last major change that was implemented in the Collette control systems, as a response to the 21 CFR Part 11 is the point verification system. This system can be used to verify the actions undertaken on the systems (e.g. select recipe, start recipe, etc.) and to verify any changes made during the execution of a recipe. When changes are made during a recipe, the system requires the operator to check whether the changed parameters are correct, to enter a reason for the change and to sign off for these changes (using userID and password) before the modifications are accepted.



Automatic Version change of recipes

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Niro Pharma Systems Seminars - Keeping our customers informed

On September 12, 2001, Niro Pharma Systems and the local agent, Kurtteks, organized an 'Oral Solid Dosage Forms' Symposium in Istanbul, Turkey. All business entities of NPS were present to introduce their latest technologies to the Turkish market.

Collette NV - the absolute market leader in Turkey for Granulators, had no less than three personnel presenting the latest information about Granulators, Integrated Systems and One-Pot Processors.

Apart from these topics, the latest developments in all other aspects of oral solid dosage form production - fluid bed technology, tableting, coating, IBC and containment technology were presented to the 123 participants from 34 companies.

Our agent arranged a splendid location for the seminar in the Divan Hotel in the centre of Istanbul. For the convenience of the participants, a complete documentation folder (including an information CD-ROM) was prepared and a simultaneous translation of the presentations into

Turkish was provided. The organization of this seminar went very smoothly and for this we would like to thank Kurtteks for their efforts.

The reactions of the participants after the seminar very consistently positive and showed that they had enjoyed the presentations and found the whole seminar very interesting and well organized.

On October 15, 16 and 17 a similar seminar for 'Oral Solid Dosage Form Production' was held in Denmark. This seminar was the initiative of Helge Hersboell, our Regional Sales Manager for Scandinavia to contact the decision-makers of the pharmaceutical industry in this region. The basic programme consisted of a one-day course presenting the technologies used in oral solid dosage form production, which was repeated for three days, to welcome all interested customers.

The main topics for this seminar were Containment and Spray Drying, but presentations about Granulation, Drying and Tableting were also included.

In total 88 participants (58 from Denmark and 30 from Sweden) attended this seminar, spread evenly over the 3 days.

The location for this seminar was at the Niro A/S facilities in Søborg (just out side Copenhagen), which gave the participants the opportunity to visit the test laboratory and see several of the discussed technologies. Again the reaction from the participants was positive - especially the in-depth knowledge of customers' questions and problems, demonstrated by the speakers was much appreciated - proved by the fact that during this seminar three existing projects were initiated and many more were discussed.

As a conclusion, we can state that such informational events are very much appreciated by our customers. It is the intention of NPS and Collette to continue organizing such seminars in different parts of the world.

To keep up-to-date about whether such a seminar will be organized in your region, please check the Collette (<http://www.collette.be>) or NPS website (<http://www.niropharmasystems.com>) regularly. All information about future seminars and other events will be included on the 'latest news' pages.

Images of the seminar in Turkey

1) The audience

2) Some of the speakers

3) In troduction by Mr. De Naeghel



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Niro Pharma Systems Synergies - the Ilsan Iltas story

One of the major advantages Collette has as a member of Niro Pharma Systems, are the synergies that exist between the different business entities in NPS. As a group, Niro Pharma Systems can deliver a full solid dosage form production line, from Weighing Stations and IBC-Systems, through to the Granulation Suite and on to the Tablet Press.

A recent example of the exploitation of these synergies is the project at Ilsan Iltas Pharmaceuticals (Istanbul, Turkey).

Founded in 1964 as a small laboratory, Ilsan Iltas has grown over the years to one of the major pharmaceutical manufacturers employing 730 people and producing 46 different products (gastroenterologicals, analgesics, cardiologicals, antimicrobials, anti-allergics and various OTC-products). In 1999 the company became part of the Hexal Group, which enabled them to broaden their horizon and become Turkey's biggest pharmaceutical exporter. Ilsan-Iltas has always assigned great importance to employing the latest technologies and cGMP rules for manufacturing and controlling their products as shown by the extensive ongoing investments. In the beginning of 2002, Ilsan Iltas will move its production to a brand new plant, which will even be further expanded to a production capacity of 100 million units per shift by 2003.

In May 2001, thanks to the efforts of Kurteks, our agent in Turkey, Ilsan Iltas chose NPS as the supplier for its new solid dosage form production line.

The new production line consists of a Collette GRAL 600 integrated with an Aeromatic-Fielder T-5 fluid bed - both equipped with an automatic Wash-In-Place system - a Gally Systems IBC blender, a complete bin system with post hoists and IBC wash station, wet and dry sizing mills and a Courtoy rotary tablet press, type R190FT/24.

The advantage of choosing NPS as supplier in this case is the fact that the whole production line can be provided from one supplier. Although four of the NPS companies are involved in the project, Ilsan Iltas only has to deal with ONE company and ONE contact person to co-ordinate the

whole project.

Even in the early stages of the project, both Ilsan Iltas and our agent only needed to communicate with one contact for the entire NPS group. In the negotiation stages this contact is the Regional Sales Manager.

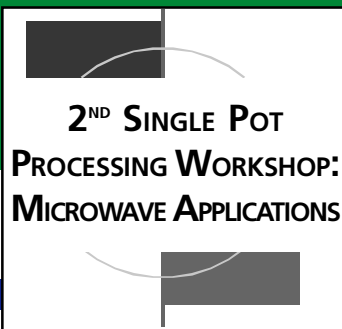
The order for the full production line was placed with only one company of the NPS-group. For this project Collette is the leading company that received the order. In turn Collette ordered the different components from the other business entities of NPS. This has saved both the customer and the agent the trouble of ordering each component of the system separately with every business entity.

For the co-ordination of the project, one NPS project manager has been assigned who is responsible for all communication with Ilsan Iltas. He manages the progress of the project with the different business entities and is the go-between for the business entity project manager and the customer or agent. Again, co-ordination and communication is much smoother when there is only ONE contact person.

In brief - the Ilsan Iltas project clearly describes the advantages for customer, agent and NPS companies that arise from the synergies within the

4) Gral 600

5) + 6) Images of the new, modern production plant of Ilsan Iltas



FDA 21 CFR Part 11 (continued)

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For signing off of the changes (and of the actions where point verification is required) several options exist: the system requires either a single signature (from an operator or a supervisor) or a double signature (2 operators or operator + supervisor). All point verification data are included in the batch record.

Several pharmaceutical companies have already audited the Procoll Pro system, and no major remarks were given. Of course Collette will continue to match the Procoll Pro control system to the 21 CFR Part 11 requirements.

If you want more information about the Procoll Pro control system and the methods that are used for make the system designed to be compliant, please contact us (see back of the newsletter for contact details).

Upcoming Events

2nd Single Pot Processing Workshop - February 25-26, 2002

Given the situation in the world after September 11 and the changed policies of many companies regarding travel, the 2nd Single Pot Processing Workshop has been postponed until February 25 and 26, 2002. If you want more information about this event, please visit our website, or contact Collette NV direct.

Interpack 2002 - Düsseldorf - April 24-30, 2002

We will be very happy to welcome you on our booth to demonstrate and explain our equipment in more detail



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