Guidance for Industry: Guide to Good Distribution Practice for Pharmaceutical Products

Version 1.0

Pharmacy and Poisons Board of Hong Kong

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PURPOSE AND SCOPE

1. The purpose of this guidance is to provide additional information to the holder of Wholesale Dealer Licence ("WDL holder") for pharmaceutical products [Note 1] regarding the Guide to Good Distribution Practice for Pharmaceutical Products ("GDP Guide") promulgated by the Pharmacy and Poisons Board of Hong Kong ("the Board"), which is available at the websites of the Board (https://www.ppbhk.org.hk) and the Drug Office of the Department of Health (https://www.drugoffice.gov.hk).

2. The good distribution practice ("GDP") requirements clearly specified in the GDP Guide are not included in this document as they are deemed to be self-explanatory. A WDL holder should read in conjunction with the GDP Guide.

3. This guidance is an administrative document and is developed based on other international references. It is intended that this document will be amended from time to time to include additional guidance arising from discussions with relevant stakeholders and from on-site inspections by inspectors of the Drug Office.

4. WDL holders should ensure that they comply with the GDP Guide, and the relevant documentation is made available to the Department of Health to verify compliance with GDP requirements whenever requested.

5. This document does not apply to the trade solely dealing in non-medicinal poisons (such as chemical reagents, hair-dyes and industrial chemicals) or solely dealing in medical devices containing poisons.

6. For companies wishing to apply for a WDL, please refer to "Guidelines for Application for Wholesale Dealer Licence/ Antibiotics Permit/ Wholesale Dealer's Licence to Supply Dangerous Drugs" which is available at the websites of the Board and the Drug Office.

Note 1 Holders of Licence for Manufacturer of Pharmaceutical Products ("ML holder") have to comply with the GMP Guide issued by the Pharmacy and Poisons Board of Hong Kong, which already stipulates the consideration for GDP in distribution of pharmaceutical products.

INTRODUCTION

7. Regulation 25 of the Pharmacy and Poisons Regulations (Cap. 138A, Laws of Hong Kong) stipulates that a person must not, by way of wholesale dealing, sell or supply at or from any premises a pharmaceutical product, or a substance or article consisting of or containing any poison, unless the person (i) holds a WDL, (ii) is an authorized seller of poisons or (iii) is a licensed manufacturer selling or supplying only pharmaceutical products manufactured by the licensed manufacturer.

8. Currently, WDL holders who engage in wholesale dealings of pharmaceutical products are required to comply with the Pharmacy and Poisons Ordinance (Cap. 138, Laws of Hong Kong) and any other requirements related to pharmaceutical products imposed under the Laws of Hong Kong, as well as the Code of Practice for Holder of Wholesale Dealer Licence ("COP") and relevant guidance documents issued by the Board. The COP provides guidance on the roles and responsibilities of WDL holders and sets out the minimum standards for distributing pharmaceutical products.

9. The WDL holders are also required to comply with the GDP Guide as licensing condition as stipulated in the WDL. Compliance with the guide will ensure control of the distribution chain and consequently maintain the quality and the integrity of pharmaceutical products.

10. Violation of the COP or the GDP Guide, which form part of the licensing conditions, may result in disciplinary actions including revocation or suspension of the WDL [Note 2] by the Pharmacy and Poisons (Wholesale Licences) Committee for such period as it thinks fit.

Note 2 The COP and the GDP Guide do not apply to trade solely dealing in non-medicinal poisons (such as chemical reagents, hair-dyes and industrial chemicals) or solely dealing in medical devices containing poisons.

OUTLINE OF THE GDP GUIDE

11. The GDP Guide is divided into two parts (i.e., Part I and Part II). Part I provides the requirements for pharmaceutical products while Part II provides the requirements specific to active substances. The requirements laid out in the GDP Guide are based on Pharmaceutical Inspection Co-operation Scheme ("PIC/S") Guide to Good Distribution Practice for Medicinal Products (PE 011-1) and PIC/S Guidelines on the Principles of Good Distribution Practice of Active Substances for Medicinal Products for Human Use (PI 047-1) [Note 3].

12. Part I of the GDP Guide comprises 9 chapters and are outlined as follows:

CHAPTER 1 QUALITY MANAGEMENT

13. This chapter introduces the concept of quality system, including the principles of quality risk management, to WDL holders. "*Wholesale distributors should maintain a quality system setting out responsibilities, processes and risk management principles in relation to their activities*." A quality system is the sum of all aspects of a system that implements quality policy and ensures that quality objectives are met.

14. The management of a WDL holder is responsible for the quality system, which requires their leadership and active participation and should be supported by staff commitment. The designated responsible person ("RP"), who is appointed by the management, is responsible for ensuring the implementation and maintenance of the quality system.

CHAPTER 2 PERSONNEL

15. This chapter defines the responsibilities and requirements of RP who is responsible for GDP compliance of the WDL holder. "*The wholesale distributor must designate personnel responsible for GDP compliance. Relevant personnel should have appropriate competence and experience as well as knowledge of and training in GDP*". Other than RP, there must also be sufficient competent personnel to carry out all the tasks for which the WDL holder is responsible. RP refers to the same person as the Person-in-charge of Poisons and

Note 3 The PIC/S Guide to Good Distribution Practice for Medicinal Products (PE 011-1) and the PIC/S Guidelines on the Principles of Good Distribution Practice of Active Substances for Medicinal Products for Human Use (PI 047-1) are available at the website of PIC/S (https://picscheme.org/en/picscheme).

Pharmaceutical Products ("PIC") [Note 4] named in the WDL.

16. Training requirements for all relevant staff including the RP are also defined. The training records should be kept and the effectiveness of training should be periodically assessed.

CHAPTER 3 PREMISES AND EQUIPMENT

17. Premises should be designed or adapted to ensure that the required storage conditions are maintained. The premises should be clean, dry and maintained within acceptable temperature limits, and also suitable secure and of sufficient capacity to allow storage and handling of pharmaceutical products.

18. Equipment impacting on storage and distribution of pharmaceutical products should be designed, located, maintained and cleaned to suit its intended purpose. The repair, maintenance and calibration activities for key equipment should be recorded. Key equipment and key process(es) should be identified for qualification and/or validation to ensure correct installation and operation.

CHAPTER 4 DOCUMENTATION

19. Good documentation constitutes an essential part of the quality system. Written documentation should prevent errors and permits the tracking of relevant distribution operations.

20. Documentation comprises all written procedures, instructions, contracts, records and data and they should be readily available/ retrievable. Records should be made at the time each operation is undertaken. Attention should be paid to the approval, distribution, review and retention of documentation.

CHAPTER 5 OPERATIONS

21. This chapter focuses on the operations related to wholesale distribution of

Note 4 Under reg 26(8) of the Pharmacy and Poisons Regulations (Cap. 138A, Laws of Hong Kong), an applicant for a wholesale dealer licence shall nominate in writing a responsible person to be in charge of the poisons or pharmaceutical products.

pharmaceutical product which includes qualification of suppliers and customers, receipt of pharmaceutical products, storage, destruction of obsolete goods, picking, supply, and import and export.

22. All actions taken by WDL holders should ensure that the identity of the pharmaceutical product is preserved and that wholesale distribution is performed according to the information on the outer packaging. The WDL holders should use all means available to minimise the risk of falsified pharmaceutical products entering the legal supply chain. WDL holders should ensure that their proposed suppliers or customers are authorised or entitled to conduct wholesale dealing activities with them.

CHAPTER 6 COMPLAINTS, RETURNS, SUSPECTED FALSIFIED PHARMACEUTICAL PRODUCTS AND PHARMACEUTICAL PRODUCT RECALLS

23. All complaints, returns, suspected falsified pharmaceutical products and recalls should be handled carefully according to written procedures and recorded. An assessment of returned pharmaceutical products should be performed by designated personnel before any approval for resale.

CHAPTER 7 OUTSOURCED ACTIVITIES

24. This chapter clearly defines the roles and responsibilities of the Contract Giver and the Contract Acceptor, and the requirement of written contract specifying the duties of each party relating to the outsourced activity. Any activity covered by the GDP Guide that is outsourced should be correctly defined, agreed and controlled. Any work entrusted to the Contract Acceptor should not be outsourced to a third party without the prior evaluation and approval from the Contract Giver as well as an audit of the third party.

CHAPTER 8 SELF-INSPECTIONS

25. This chapter defines the requirement for a self-Inspection program, which should be conducted in order to monitor implementation and compliance with GDP principles and to propose necessary corrective measures. RP should ensure the self-inspections are performed at appropriate regular intervals.

CHAPTER 9 TRANSPORTATION

26. This chapter defines the responsibility of the WDL holder in protecting the supplied pharmaceutical products against breakage, adulteration, theft as well as ensuring that temperature conditions are maintained within acceptable limits during transport. Regardless of the mode of transport, it should be possible to demonstrate that the pharmaceutical products have not been exposed to conditions that may compromise their quality and integrity.

27. Part II of the GDP guide sets out the GDP requirements specific to active substances, which comprises the following 8 chapters:

CHAPTER 1 SCOPE
CHAPTER 2 QUALITY SYSTEM
CHAPTER 3 PERSONNEL
CHAPTER 4 DOCUMENTATION
CHAPTER 5 PREMISES AND EQUIPMENT
CHAPTER 6 OPERATIONS
CHAPTER 7 RETURNS, COMPLAINTS AND RECALLS
CHAPTER 8 SELF-INSPECTIONS

28. This part generally follows the principles as Part I of the GDP Guide and therefore, the outlines of each chapter are not repeated here.

GUIDANCE ON THE GDP GUIDE

29. The following table provides additional information in the form of guidance on specific clauses of the GDP Guide [Note 5]. Examples are listed for illustrative purpose only. A WDL holder should consider the size, structure and complexity of the distribution activities when developing its own system and procedures.

30. This guidance is developed based on other international guidelines (see REFERENCE section). WDL holders may develop specific ways to comply with the GDP Guide, provided that proper scientific justification and the principles of GDP have been taken into consideration.

Clause Number *(refers to Part I of the GDP Guide)*	**Requirement**	**Guidance**
1.2	Quality System	The quality system should cover all GDP operations. The size and complexity of the quality system of a WDL holder should be proportionate to the distribution activities being undertaken and appropriate for the nature of the company. A WDL holder which is a one-person company should also develop the quality management system ("QMS"). For more information of quality system, a WDL holder can refer to the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use ("ICH"), Q10 Pharmaceutical Quality System, which is available at https://www.ich.org/.
1.2.2	Documented Quality System	The GDP quality system is needed to be in written format. It contains the following elements: • Quality risk management; • Change management; • Deviation management; • Corrective and Preventive Action (CAPA); • Management of controlled documentation;

Note 5 WDL holders should refer to the "GDP Guide for pharmaceutical products" for specific clauses. The clause number refers to Part I of the GDP Guide.

<table>
<tr><td></td><td></td><td>• Self-inspection;
• Control of outsourced activities.</td></tr>
<tr><td>1.2.2</td><td>Quality Manual</td><td>A quality manual or equivalent documentation approach should be established and should contain a description of the quality system developed in the WDL holder.

The quality manual defines the philosophy and policies of the QMS, such as inclusion of mission and vision of the company, and organizational chart. It also defines and displays the different documents that are used in the QMS, such as standard operating procedures (“SOP”), work instructions, etc. The content of which should be proportionate to the complexity and size of an individual organization.

For more information of quality manual, a WDL holder can refer to ICH Q10 Pharmaceutical Quality System which is available at https://www.ich.org/.</td></tr>
<tr><td>1.2.2</td><td>Monitoring the Effectiveness of Quality System</td><td>The effectiveness of the QMS should be monitored. The monitoring can be measured in various ways, for example:
• the number of items still outstanding and their importance
• how long they have been an issue
• the number of items relating to a particular area, and whether these relate to the facility, operations or training of staff

Example
<table>
<tr><th>Indicators</th><th>Example</th></tr>
<tr><td>Change control</td><td>• number of proposed changes are opened and closed
• areas of the business to which they are related</td></tr>
<tr><td>Corrective and Preventive Action (CAPA)</td><td>• number of CAPAs are currently in the system and statuses
• number of closed CAPAs
• areas of the business to which they are related</td></tr>
</table>
</td></tr>
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<table>
<tr><td></td><td></td><td><table>
<tr><td>Complaints</td><td>• number of customer complaints are outstanding and closed
• areas of the business to which they are related
• any reoccurring issues</td></tr>
<tr><td>Deviation management</td><td>• number of open deviations currently in the system
• number of deviations have been closed
• areas of the business to which they are related</td></tr>
<tr><td>Self-inspections</td><td>• any relevant comments or observations made by the result of self-inspections
• CAPAs and the statuses of the follow-up</td></tr>
<tr><td>External assessments</td><td>• any relevant comments or observations made by the results of external assessments (inspections, customer audits, etc.)
• CAPAs and the statuses of follow-up</td></tr>
<tr><td>Managing and controlling documents and records</td><td>• all standard operation procedures for wholesale distribution are in place
• number of documents that have passed the review dates
• number of documents under progress in updating</td></tr>
<tr><td>Outsourced Activities</td><td>• review the performance indicators relating to the outsourced activities (deviations, complaints, etc.) and the subsequent follow-up
• review any audit findings on the contract acceptors</td></tr>
</table></td></tr>
<tr><td>1.2.6</td><td>Change Control</td><td>The purpose of a change control system is to enable wholesalers to identify, document and assess changes that may affect compliance with GDP. Such changes may include, for example: a change in an insulated shipper used to transport</td></tr>
</table>

		cold-chain pharmaceutical products, a change in transportation company, the relocation of warehouse, etc. A change control system should be in place. A change control generally consists of several stages: i. initiation of a documented change control request ii. assessment of the change request iii. implementation of the change iv. review of the change Any change should be handled and controlled in accordance with risk management practices to ensure that changes do not negatively impact operations or compromise product quality. A written procedure is expected to be available for describing the steps for change control which include responsibilities, impact assessment of the change based on risk, necessary validation, documentation review, regulatory impact, and the necessity to have planned activities for the change. **Example** <u>Replacement of refrigerator</u> If the refrigerator used to store pharmaceutical products breaks down and needs to be replaced, a change control request has to be raised to ensure that the purchase, assessment of quality, validation requirements, capacity, and documentation required for maintenance/calibration and specifications of the new refrigerator meet the temperature range of the products to be held in the refrigerator.
1.2.7v.	Deviation	Deviations are non-conformances with GDP or in-house procedures. A written procedure is expected to be in place specifying the processes of identification, documentation, investigation and closure of deviations. The RP should be informed about the deviations, and an assessment should be performed to determine the impact on product quality and/or the quality system. The principles of quality risk management should be incorporated into the deviation handling process.

		Deviation investigation is aimed at identifying the root cause of the deviation, and subsequent corrective and preventive actions (CAPAs) may arise because of deviations. Such information should be documented. **Example** <u>Handling of deviation of temperature excursions</u> • Notify the Responsible Person ("RP") about the temperature excursion • Quarantine the affected stock of product • Thoroughly investigate (to identify root cause) and document, including the outcome of investigations • Identify and implement subsequent CAPAs following the investigation to prevent recurrence • Involve RP in deciding the disposition of the affected stock. The decision of retaining or disposing should be based on scientific justification. The manufacturer or product registration certificate holder may be required to be consulted regarding the effect of excursion
1.2.7vi.	CAPA	Corrective and preventative actions (CAPA) are the planned actions which may arise because of deviations, self-inspections or from other incidents. It should be used in conjunction with the root cause analysis. The whole investigation and CAPA implemented should be documented. *Corrective actions* are actions to be taken to eliminate the cause of a detected non-conformity or other undesirable situation (i.e. prevent recurrence). *Preventive actions* are actions to be taken to eliminate the cause of a potential non-conformity or other undesirable potential situation (i.e. prevent occurrence). Depending on the CAPA, the implementation of the CAPA should be monitored for its timeliness and effectiveness. The level of effort, formality, and documentation of the actions should be commensurate with the level of impact of the issue on product quality.

1.3	Management of Outsourced Activities	A WDL holder (as contract giver) is ultimately responsible for the compliance of all activities they choose to outsource, and which are conducted on their behalf, and responsible for assessing whether the contract acceptor is capable of undertaking activities appropriately (*please also see Chapter 7 Outsourced Activities)*.
1.4.1	Frequency of Management Review	An appropriate review frequency will vary on many factors and there are no specific minimum criteria as to what is considered a good periodic review frequency. WDL holders should formulate their own rationale as to the periods of time left between reviews. Factors to consider may include but are not limited to: • activities undertaken by the company • volume of activities undertaken • types of medicines handled and complexity of operations. Any review period should be justified on a risk basis but not exceed 12 months at the lowest areas of risk.
1.5	Quality Risk Management (QRM)	Quality risk management (QRM) is a systematic process for the assessment, control, communication and review of risks to the quality of the pharmaceutical product. It is a valuable component of an effective quality system. The use of risk management should be based on scientific knowledge and experience. The level of detail contained within the risk management process should be reflective of the level of risk to the product. Risk assessments should be carried out by competent personnel and reviewed and approved by relevant personnel, including RP. Further details on the principles and examples of the processes and applications of quality risk management can be found in the ICH, Q9 Quality Risk Management, which is available at https://www.ich.org.

2.2.3	Key Positions	Employees working in key positions are the designated responsible persons appointed by the management, key positions will include the responsible person for GDP compliance ("Responsible Person" or "RP") (see 2.3.1 for Responsible Person for GDP Compliance). There should be written job descriptions available for the employees working in key positions. For RP, the written job description should cover the responsibilities which include but not limited to: i. ensuring that a quality management system is implemented and maintained; ii. focusing on the management of authorised activities and the accuracy and quality of records; iii. ensuring that initial and continuous training programmes are implemented and maintained; iv. coordinating and promptly performing any recall operations for pharmaceutical products; v. ensuring that relevant customer complaints are dealt with effectively; vi. ensuring that suppliers and customers are approved; vii. approving any subcontracted activities which may impact on GDP; viii. ensuring that self-inspections are performed at appropriate regular intervals following a prearranged programme and necessary corrective measures are put in place; ix. keeping appropriate records of any delegated duties; x. deciding on the final disposition of returned, rejected, recalled or falsified products; xi. approving any returns to saleable stock; xii. ensuring that any additional requirements imposed on certain products by legislation are adhered to. A WDL holder is required to appropriately allocate adequate resources and authority to the RP to implement and maintain an effective quality management system to meet the GDP requirements.

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<tr><td></td><td></td><td></td></tr>
<tr><td>2.3.1</td><td>Responsible Person for GDP Compliance</td><td>A WDL holder must designate a personnel responsible for GDP compliance (“Responsible Person” or “RP”), who is also the person-in-charge of poisons and pharmaceutical products (“PIC”) named on the WDL.

WDL holders should ensure that the appointed RPs are suitable for their roles and are able to implement and maintain the quality management system to meet the GDP requirements.</td></tr>
<tr><td>2.3.1</td><td>Requirements for RP</td><td>The relevant personnel appointed as RPs should have appropriate competence and experience as well as knowledge of and training in GDP. A WDL holder should carefully consider the appointment of a RP to ensure to the correct person is put in place. The size of the organisation, the complexity of the services to be provided and the product classes to be supplied should be taken into consideration during the appointment.

The following criteria are set as an example for a WDL holder to consider when appointing a RP.

Example
<table>
<tr><td>Competence</td><td>• The RP is competent and qualified to discharge the duties as WDL holder.
• The RP has relevant qualifications in the related fields.</td></tr>
<tr><td>Experience</td><td>• The RP has relevant working experience on the GDP-related activities to be carried out and the activities authorized under the licence for the WDL holder (e.g. handling cold-chain products).</td></tr>
<tr><td>Knowledge</td><td>• The RP has access to relevant pharmaceutical and technical knowledge and advice when it is required.
• The RP has demonstrated the knowledge of GDP, and how it integrates in the systems and processes implemented.</td></tr>
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<tr><td></td><td></td><td>
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<tr><td></td><td>• The RP possess basic understanding on the regulations on wholesale of pharmaceutical products activities.</td></tr>
<tr><td>Training</td><td>• The RP has received GDP training, understands the GDP requirement and is able to maintain and implement the quality system to fulfil GDP requirements.
• The RP maintains the competence in GDP through regular trainings and keep records as evidence.</td></tr>
</table>

The RP (as the PIC), and deputies if any, should be approved by the Pharmacy and Poisons (Wholesale Licences) Committee.
</td></tr>
<tr><td>2.3.2</td><td>Out of Hours Contact</td><td>The RP should fulfil his/her responsibility personally and is expected to be continuously contactable by the Drug Office, by way of a mobile phone number or an electronic mail address. If the RP is unavailable (e.g. on leave), a deputy should be reachable to ensure there is always a contact point for the Drug Office.</td></tr>
<tr><td>2.3.2</td><td>Designation of Responsibilities</td><td>Whereas a duty may be delegated within a job description on what may appear to be a practical permanent basis, the ultimate duty is still the responsibility of the RP and should be treated as such with appropriate oversight.</td></tr>
<tr><td>2.4.1 - 2.4.4</td><td>Training Programme</td><td>All relevant personnel involved in wholesale distribution activities (including drivers) should receive initial and continuing training and periodically assessed.

Training processes can be split into four stages:
i. Identification of training needs of the relevant personnel based on their roles and duties
ii. Relevant training content (e.g. the GDP guide, SOPs)
iii. Training implementation
iv. Training outcomes assessment

The training includes:</td></tr>
</table>

		• Requirements of GDP • Any procedures relevant to the roles of the personnel received training • Product identification and avoidance of falsified pharmaceutical products entering the supply chain • Specific training for the personnel who dealing with any products which require more stringent handling conditions, such as temperature-sensitive products, advanced therapy products, hazardous products, radioactive materials, etc.
2.4.5	Training Record and Assessment	The assessment may include a review of their knowledge and technique to perform the assigned task by previously trained and experienced or knowledgeable personnel. The training and assessment should be documented in their individual training record.
3.1	Acceptable Temperature Limits	In accordance with the storage conditions on the outer labelling of the products.
3.2.3	Segregated Storage Areas	Measures shall be taken to prevent contamination of pharmaceutical products and mixing up of different products. There shall be segregated storage areas for different categories of pharmaceutical products, namely products in quarantine and products released, rejected, returned, or recalled. The different products and areas concerned shall be clearly identified.
3.2.5 – 3.2.6	Products with Specific Handling	Radioactive materials, dangerous drugs, psychotropic substances, cytotoxic drugs and medical gases **Note 6** shall be stored in a facility with additional safety and security measures as appropriate. WDL holders should also observe the relevant local legislation.

Note 6 Medical gases will be regulated as pharmaceutical products starting from 14 June 2026. WDL holders should also refer to "Guidance Notes on Manufacture, Wholesale, Storage and Transport of Medical Gases" issued by the Pharmacy and Poisons Board of Hong Kong, available at (https://www.ppbhk.org.hk/eng/files/Guidance_Notes_on_MWST_of_Medical_Gases_eng.pdf).

3.3.2	Mapping Studies	A temperature-mapping study is required for any space allocated for the storage and handling of products with a specified labelled storage temperature. A WDL holder shall measure the temperature and humidity at different locations of the storage facility to ensure uniformity across the area. The location and numbers of measuring points will depend on the size, layout, location of heating and cooling components, etc. Based on the readings obtained, calibrated thermometer, hygrometer or equivalent equipment shall be placed in those location(s) with the highest fluctuation in temperature and humidity for daily monitoring of the storage condition. The monitoring records, such as the daily maximum and minimum temperature and humidity, shall be kept. The equipment shall be calibrated at defined interval for the required operating range and the calibration records shall be maintained. The subsequent mapping studies are expected to conduct periodically (or whenever significant modifications) in order to demonstrate continuing compliance. WDL holders may refer to World Health Organization (“WHO”) Technical Report Series, No. 961, Annex 9, Supplement 8: Temperature mapping of storage areas for conducting mapping studies.
3.4.1	Equipment for storage of temperature-sensitive products	Equipment (or storage facilities) for storing of temperature-sensitive pharmaceutical products, such as cold room, freezer and refrigerator, should at least be equipped with the following: • Alarm or alert system to alert staff of any temperature excursions. The alarm system shall be tested periodically and testing records shall be kept. • Backup power to maintain the storage conditions of the pharmaceutical product in the event of power failure.

		Any backup generators used shall be subject to periodic testing. • Alternative back-up plans that provide equivalent storage conditions and monitoring system in case of unavailability of backup generator or malfunction of the cold room or refrigerator. (Justification(s) shall be provided for the Pharmacy and Poisons (Wholesale Licences) Committee's consideration if some other contingency measures are proposed to safeguard against inappropriate storage conditions)
3.5	Computerised System	A computerised system is a set of software and hardware components which together fulfil certain functionalities. Where a computerised system replaces a manual operation, there should be no resultant decrease in product quality, process control or quality assurance. There should be no increase in the overall risk of the process.
3.5.4	Data Handling	Physical and/or logical controls should be in place to restrict access to computerised system to authorised persons. Methods to prevent unauthorised access to the system may include the personal codes with passwords, use of keys, pass cards, restricted access to computer equipment and data storage areas. The frequency of back up is dependent on the computer system functions and the risk assessment of a loss of data. Access to data should be ensured throughout the retention period.
3.6.1	Qualification of Equipment	WDL holders should identify what equipment is key to their wholesale operation. The scope and extent of such qualification and/or validation activities should be developed in risk management principles. Qualification activities will be considered at various stages, starting from initial user requirements specification

		development through to the end of equipment's use. This may include design, installation, operation and performance. It should be noted that there are multiple approaches to perform qualification and/or validation. A WDL holder can assess which approach would be the most suitable for the operation. **Example** <u>Considerations in qualifying cold room/ freezer/ refrigerator</u> The tests in the qualification exercise at least include: • Temperature mapping study – to assess the control and maintenance of uniform temperature within the storage area • Door opening test – to assess the door opening period without exceeding the specified temperature limits, the recovery time after door opening event • Power failure test – to assess the duration which the specified temperature range can be held during power failure, the recovery time once the power is restored • Alarm test – to verify the operation of alarm system
4	Required GDP Documentation	There are 2 primary types of documentation used to manage and record GDP compliance: instructions and records/reports. <u>Instructions (directions or requirements) type</u> • Procedures (otherwise known as "Standard Operating Procedures" or "SOPs"): Give directions for performing certain operations. • Protocols: Give instructions for performing and recording certain discreet operations, e.g. mapping study protocol, refrigerator qualification protocol, etc. • Technical Agreements: Are agreed between contract givers and acceptors for outsourced activities. <u>Record/Report type</u> • Records: Provide evidence of various actions taken to demonstrate compliance with instructions, e.g. activities,

<table>
<tr><td></td><td></td><td>events, investigations, distribution, etc. Records include the raw data which is used to generate other records.
• Reports: Document the conduct of particular exercises, projects or investigations, together with results, conclusions and recommendations.</td></tr>
<tr><td>4.2.1</td><td>Readily Available/Retrievable</td><td>Documents including procedures and records should be available or easily accessible to the personnel doing the operation described in the document.</td></tr>
<tr><td>4.2.4</td><td>Designated Person</td><td>The authority to approve documents should be authorized by management and documented as such. Where these authorisations pertain to RP functions, this should be appropriately documented.</td></tr>
<tr><td>4.2.8</td><td>Kept up-to-date</td><td>SOP should reflect current regulatory requirements, local practices, and company specific operations.</td></tr>
<tr><td>4.2.8</td><td>Approved Procedures</td><td>Valid and approved procedures should be used. Documents should have unambiguous content; the title, nature and purpose of the documents should be clearly stated and with version control.

Example
<u>Format of SOP</u>
<table>
<tr><td colspan="2">Company name, address or logo</td></tr>
<tr><td colspan="2">STANDARD OPERATING PROCEDURE</td></tr>
<tr><td colspan="2">Title:</td></tr>
<tr><td>SOP no.:</td><td>Version No.:</td></tr>
<tr><td>Reviewed by:</td><td>Date of review:</td></tr>
<tr><td>Approved by:</td><td>Date of approval:</td></tr>
<tr><td>Date of Effective:</td><td></td></tr>
<tr><td colspan="2"></td></tr>
<tr><td colspan="2">I. Introduction
- purpose, scope</td></tr>
<tr><td colspan="2">II. Procedure:
- operation steps, arrangement, responsible personnel, etc.</td></tr>
</table></td></tr>
</table>

		III. Appendix - record form, log, etc.
5.2.3	Periodically Rechecked	Periodic assessments of authentic and genuine should be undertaken on a risk basis. This may include but is not limited to: • functions undertaken by the company, reliability of the organization • any history of regulatory action • length of time in business and types of pharmaceutical products offered. Where additional guidance may be published, such as regulatory suspension or revocation notice, these should be examined on the frequency published by the Licencing or Competent Authority.
5.3.2	Authorization for Distribution	Authorization for distribution means holding a licence, it may also include other authorisations or entitlements. Relevant national legislation should be reviewed to ascertain entitlements.
5.3.3	Unusual Sales Patterns	Best practices for the investigation of "unusual sales patterns" including the check for: • unusual repetition of orders • sudden increases of orders • unusually low prices
5.4.1	Receipt of Products	The followings shall be noted upon receipt of each incoming batch of pharmaceutical products: • check whether there is any physical tampering and damage of the products. • verify label description, type and quantity of products against the relevant purchase order. • ensure products are accompanied by batch release certificates or certificates of analysis issued by the

		manufacturers, and also check these certificates to ensure the quality of the products. All the above checking and verification shall be supported by documentary records.
5.5.3	Appropriate Storage Conditions	As defined on the outer packaging of the product.
5.5.5	Storage and Supply	A WDL holder shall not supply pharmaceutical products with broken seals, damaged packaging, suspected tampering or contamination or which have been stored in undesirable storage condition, and shall properly segregate such products.
5.5.6, 5.7	Near Expiry Date/ Appropriate Remaining Shelf-life	There is sufficient shelf life left that based on the time of supply to the pharmacy/retailer and then the patient, the product will still be within shelf-life when it is consumed.
5.5.7	Stock Irregularities	Significant stock discrepancies shall be investigated to ensure that there has been no mixing up, incorrect issue and/or misappropriation of pharmaceutical products.
6.3	Returned Pharmaceutical Products	RP should approve the handling of returned pharmaceutical products including their return to saleable stock or disposal.
6.4	Falsified Pharmaceutical Products (*see Glossary*)	Counterfeit goods are regulated under the Trade Descriptions Ordinance (Chapter 362, Laws of Hong Kong), which is enforced by the Customs and Excise Department. For more information, a WDL holder can refer to Hong Kong Customs and Excise Department (https://www.customs.gov.hk). A WDL holder should refer to Hong Kong e-Legislation for the Laws of Hong Kong (http://www.elegislation.gov.hk).
7.1	Outsourced Activities Covered	Any outsourced activities covered by the GDP Guide should be clearly defined, agreed and controlled. Examples of outsourced activities include storage at third party facility, transportation, cleaning and facility maintenance and pest control.

7.1	Written Contract	The details of arrangements between the contract giver and the contract acceptor as well as their duties and responsibilities should be clearly laid out in the written contract. RP has a role in monitoring the outsourced activities particularly in GDP compliance aspect (*please also refer to Chapter 1 for management of outsourced activities*).
7.2.2	Audit	The contract giver is responsible for assessing the competence of the contract acceptor and ensuring, through contracts and audits, that the principles and guidelines of GDP are followed. A WDL holder (i.e. the contractor giver) can gather and consider the relevant background information of the contract acceptors when assessing their competence to carry out the outsourced activities, such as third-party certificates (e.g. ISO 9001, etc.) and valid licence. Depending on the nature and risks of the outsourced activities, the audit requirement and frequency for on-going assessment should be determined using a risk-based approach.
7.2.2	Conducts Audit	The person should have knowledge and expertise in the contracted operation.
8.2.1	Self-inspection	Self-inspection is a pre-arranged programme to monitor implementation and compliance with GDP principles and to proposed necessary corrective measures. An annual self-inspection schedule should be implemented as part of the Quality System and covering all aspects of GDP. The areas to be reviewed and the frequency should be documented in a self-inspection procedure. Self-inspection of different areas can be conducted separately. Companies could conduct self-inspection of one area every one or two months. Breaking up the self-inspection process into smaller blocks sometimes would be more manageable than one large self-inspection covering all aspects of GDP. **Example of Self-inspection Schedule**

<table>
<tr>
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<table>
<tr><th>Month</th><th>Inspection Scope</th></tr>
<tr><td>January</td><td>• Quality Management (Chapter 1)
• Personnel (Chapter 2)
• Premises and Equipment (Chapter 3)</td></tr>
<tr><td>April</td><td>• Documentation (Chapter 4)
• Operations (Chapter 5)</td></tr>
<tr><td>July</td><td>• Complaints, Returns, Suspected Falsified Pharmaceutical Products and Pharmaceutical Product Recalls (Chapter 6)
• Outsourced Activities (Chapter 7)</td></tr>
<tr><td>October</td><td>• Self-Inspections (Chapter 8)
• Transportation (Chapter 9)</td></tr>
</table>
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<tr>
<td>8.2.2</td>
<td>External Audits</td>
<td>A self-inspection should always be undertaken by the company. Self-inspections can be conducted by competent staff from another department within the company. WDL holders may consider external audit, by an auditor experienced in conducting audits to PIC/S or other international standards (e.g. World Health Organization), to be conducted when the quality management system (QMS) has been implemented. This can ensure that core requirements are covered.

It is not acceptable to replace self-inspections by external audits or regulatory inspections. However, a company may take into consideration the external audits by external experts when assessing the scope of their self-inspections.</td>
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<tr>
<td>8.2.3</td>
<td>Records of Self-inspections</td>
<td>The observations and outcomes of self-inspections should be documented for each self-inspection. The report (can be in the form of a checklist) containing sufficient details should be made available for management review and other relevant personnel.

In the events of non-compliance are identified, their cause should be determined and the corrective and preventive actions (CAPA) should be documented and followed up.</td>
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<td>If many quality issues are identified, self-inspections should be conducted more frequently to help identify and address the root cause of these problems, and provide the opportunity of continuous improvement.

Example of Self-inspection Checklist
<table>
<tr><td>Date:</td><td></td></tr>
<tr><td>Location:</td><td></td></tr>
<tr><td>Auditor:</td><td></td></tr>
<tr><td>Auditee:</td><td></td></tr>
<tr><td colspan="2"></td></tr>
</table>
<table>
<tr><th>Description</th><th>Inspection Items</th><th>Finding</th></tr>
<tr><td rowspan="3">Personnel</td><td>Organization structure</td><td></td></tr>
<tr><td>Roles and responsibilities</td><td></td></tr>
<tr><td>Training program and record</td><td></td></tr>
<tr><td rowspan="4">Premises – storage facilities</td><td>Cleanliness and tidiness of the storage areas and storage facilities</td><td></td></tr>
<tr><td>Security of storage areas</td><td></td></tr>
<tr><td>Storage condition monitoring</td><td></td></tr>
<tr><td>Pest control</td><td></td></tr>
<tr><td rowspan="2">Equipment</td><td>Cleanliness and maintenance of equipment impacting on storage and distribution of products</td><td></td></tr>
<tr><td>Calibration of equipment</td><td></td></tr>
</table>
</td>
</tr>
<tr>
<td>9.2.1</td>
<td>Continuous Monitoring Temperature during Transportation</td>
<td>Pharmaceutical products requiring controlled temperature storage should be transported with appropriate controls and/or monitored.

Whereas GDP does not specifically cite continuous monitoring as a requirement, a WDL holder should be able to demonstrate that storage conditions as defined on the product have been maintained. Practically, it is challenging to demonstrate goods have been transported in label conditions without continuous</td>
</tr>
</table>

		monitoring for longer journeys, however, it may be practical for short journeys outside of climatic extremes. Nevertheless, during the transportation of cold-chain pharmaceutical products, real-time monitoring and recording of temperature data in refrigerated vehicles, refrigerated container, thermal insulation container, etc. should be conducted. Continuous monitoring should be considered by risk-based approach.
9.2.3	Vehicle and Equipment for Transportation	Vehicles and equipment used for transportation should be assessed for their capabilities in maintaining the required storage conditions. There are various methods to achieve this, e.g. using temperature-controlled vehicles, validated containers or shippers, passive or active cooling systems or insulation materials. WDL holders may choose the appropriate method(s) by taking account of the nature and volume of the products, the mode and duration of transportation, the weather conditions and the cost-effectiveness[Note 7].
9.2.5	Risk Assessment of Delivery Routes	The GDP Guide specifies "*risk assessment of delivery routes should be used to determine where temperature controls are required*". The outcome of risk assessment should enable decision-making where temperature controls have to be implemented. Profound knowledge of the pharmaceutical product characteristics and detailed knowledge of the planned delivery routes are required in the risk assessment. **Example** By describing various delivery routes (i.e. modes of transport, climate zone), a grouping of products with comparable

Note 7 Medical gases will be regulated as pharmaceutical products starting from 14 June 2026. WDL holders should also refer to "Guidance Notes on Manufacture, Wholesale, Storage and Transport of Medical Gases" issued by the Pharmacy and Poisons Board of Hong Kong, available at (https://www.ppbhk.org.hk/eng/files/Guidance_Notes_on_MWST_of_Medical_Gases_eng.pdf).

		characteristics and delivery routes can be considered for risk assessment. Risk assessment can be directed at groups of delivery routes rather than for each individual route. The risk analysis, evaluation and risk mitigation measures allocated to each group can maximize efficiency of management of transportation and monitoring.
9.2.9	Transport Providers	When a WDL holder employs the outsourced transport service, they must satisfy themselves that the activities are GDP compliant (e.g. training for drivers, maintaining the required storage conditions for pharmaceutical products) and are competent to provide the service for which they are engaged (specialist transport service vs general courier service). In addition, a WDL holder shall make arrangement with the transportation providers to ensure that delivery of pharmaceutical products will be carried out in safe and secure manner, especially where the products delivered are dangerous drugs and psychotropic substances. Roles and responsibilities of both WDL holder and transport provider should be defined in a written contract (*please also see Chapter 7 Outsourced Activities and the section "management of outsourced activities" under Chapter 1*).
9.3.2	Containers and Packaging	The GDP Guide specifies the considerations on selection of container and packaging. Information of the container system such as specifications, manufacturer's instruction, conformity assessment should be obtained from the container system supplier if available. Transportation container system should be tested to show they are fit for purpose. Information to be confirmed during the qualification exercise includes: • The length of time to reach the required temperature before transport • Temperature of the product during transport

		• Total time during which product remains within the required temperature range (in hours and minutes) Scope and extent of qualification and/or validation activities should be on risk-based approach.
9.4.4	Temperature mapping of Vehicles	Temperature mapping of temperature-controlled vehicles may not be necessary if the transportation container and packaging are used as primary means of environmental control and properly validated.
9.4.5	Customer	The recipient of the product, e.g., wholesaler, pharmacy.
9.4.6	Use of Cool Packs	Procedures should be available relating to the use of cool packs: • Type, size and numbers of packs to be used in view of required temperature and transportation duration • Location of the packs within the transportation container • Barrier materials to prevent direct contact of the packs and product • Conditioning of packs and reuse
9.4.7	Control of Cool Packs	The control of reuse of cool pack may include the times it can be reused, its service-life, the conditioning prior to use, etc.

GLOSSARY

Active Substance	Any substance or mixture of substances intended to be used in the manufacture of a pharmaceutical product and that, when used in its production, becomes an active ingredient of that product intended to exert a pharmacological, immunological or metabolic action functions or to make a medical diagnosis.
Calibration	The demonstration that a particular instrument or device produces results within specified limits by comparison with those produced by a reference or traceable standard over an appropriate range of measurements.
Cold-chain Pharmaceutical Products	Pharmaceutical products requiring cold-chain management.
Contract Acceptor	The company who is contracted to conduct an activity covered by GDP by the contract giver.
Contract Giver	The company who is contracting out any activity covered by GDP to another legal entity.
Good Distribution Practice (GDP)	GDP is that part of quality assurance which ensures that the quality of pharmaceutical products is maintained throughout all stages of the supply chain from the site of manufacturer to the pharmacy or person authorized or entitled to supply pharmaceutical products to the public.
Holding	Storing pharmaceutical products.
Pharmaceutical Product	"Pharmaceutical Product" (a) means a substance or combination of substances that – (i) is presented as having properties for treating or preventing disease in human beings or animals; or (ii) may be used in or administered to human beings or animals with a view to – (A) restoring, correcting or modifying physiological functions by exerting a pharmacological,

	immunological or metabolic action; or (B) making a medical diagnosis; and (b) includes an advanced therapy product.
Procuring	Obtaining, acquiring, purchasing or buying pharmaceutical products from manufacturers, importers or other wholesale distributors.
Qualification	Action of proving that any equipment works correctly and actually leads to the expected results. The word validation is sometimes widened to incorporate the concept of qualification.
Quality Risk Management	A systematic process for the assessment, control, communication and review of risks to the quality of pharmaceutical product across the product life cycle.
Quality System	The sum of all aspects of a system that implements quality policy and ensures that quality objectives are met. (International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use ("ICH"), Q10 Pharmaceutical Quality System).
Supplying	All activities of providing, selling, donating pharmaceutical products to wholesalers, pharmacists, or persons authorised or entitled to supply pharmaceutical products to the public.
Transport	Moving pharmaceutical products between two locations without storing them for unjustified periods of time.
Validation	Action of proving that any procedure, process, equipment, material, activity or system actually leads to the expected results (see also Qualification).
Wholesale Dealer Licence (WDL)	Means a wholesale dealer licence issued under regulations made under section 29 of the Pharmacy and Poisons Ordinance (Cap.138, Laws of Hong Kong).

Wholesale Distribution	Wholesale distribution of pharmaceutical products is all activities consisting of procuring, holding, supplying, importing or exporting pharmaceutical products, apart from supplying pharmaceutical products to the public.
Wholesale Distributor	Operator who conducts wholesale distribution activities, including WDL holder and a licensed manufacturer (supplying only pharmaceutical products manufactured by the licensed manufacturer).

REFERENCE

1. PIC/S Guide to Good Distribution Practice for Medicinal Products (PE 011-1)
2. Questions & Answers document regarding the PIC/S GDP Guide (PE 011-1)
3. Guidance for Industry: Hong Kong Guide to GMP for the Secondary Packaging of Pharmaceutical Products
4. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use ("ICH"), Q9 Quality Risk Management
5. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use ("ICH"), Q10 Pharmaceutical Quality System
6. World Health Organization ("WHO") Technical Report Series 961 – Annex 9, Supplement 8: Temperature mapping of storage areas
7. World Health Organization ("WHO"). Introduction to the Technical Supplements, WHO Technical Report Serios, No. 961, 2011.

DOCUMENT INFORMATION

Version	Date	Description of Change
1.0		First version

[End of Document]