
Guidance for Industry

Container Closure Systems for Packaging Human Drugs and Biologics

Questions and Answers

**U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)**

**May 2002
CMC**

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*Office of Training and Communications
Division of Drug Information, HFD-240
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857
(Tel) 301-827-4573
<http://www.fda.gov/cder/guidance/index.htm>
or*

*Office of Communication, Training and
Manufacturers Assistance, HFM-40
Center for Biologics Evaluation and Research
Food and Drug Administration
1401 Rockville Pike, Rockville, MD 20852-1448
<http://www.fda.gov/cber/guidelines.htm>
Fax: 1-888-CBERFAX or 301-827-3844
Phone: the Voice Information System at 800-835-4709 or 301-827-1800*

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This guidance represents the Food and Drug Administration's current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. An alternative approach may be used if such approach satisfies the requirements of the applicable statutes and regulations.

This document provides questions and answers relating to the guidance on *Container Closure Systems for Packaging Human Drugs and Biologics* (the guidance).² The questions are based on those posed to CDER by applicants.

Q1: *Table 5 of the guidance (section III.E.2) provides information on the American Academy of Ophthalmology (AAO) uniform color coding system for the caps and labels of topical ocular medications. Is there a source for current information on this coding system?*

A1: Current information on the AAO color coding system can be found on AAO's Web site at <http://www.aao.org> (type *color coding* in the search entry box).

Q2: *Section VI.B of the guidance states that container closure systems for on-site storage have generally been considered a Current Good Manufacturing Practices (CGMP) issue. However, the guidance goes on to state that if a firm plans to hold bulk drug products³ in storage, then the container closure system and the maximum storage time should be described and justified in the application. If this is a CGMP issue, does information need to be included in the application?*

¹ This guidance has been prepared by the Packaging Technical Committee of the Chemistry, Manufacturing, and Controls Committee (CMCCC) in the Center for Drug Evaluation and Research (CDER) at the Food and Drug Administration (FDA).

² A notice of availability for this guidance published in the *Federal Register* on July 7, 1999 (64 FR 36694).

³ A *bulk drug product* means finished dosage form that has not yet been packaged into the container closure systems intended for market and/or sale.

A2: Information on container closure systems used for storage of bulk drug products, other than biologics or protein drug products, need not be included in the application. However, these container closure systems should be shown to be suitable for their intended use. The suitability of the storage containers should be supported by data retained by the applicant and/or manufacturer and should be made available during FDA inspection upon demand. Information as requested in section VI.B. of the packaging guidance should be included in the application on the container closure system for storage prior to packaging or shipping of biologics and protein drug products, including container closure suitability. This information should be provided for biologics and proteins because, in general, there is greater potential for adverse effects on the identity, strength, quality, purity, or potency of biologics and protein drug products during storage or shipping.

Q3: Section VI.B of the guidance states that a container closure system for the transportation of bulk drug products to contract packagers should be described in the application; section VI.B also provides recommendations on information to include in the application. However, different recommendations are provided for holding bulk drug products in storage, and this situation appears to include shipping of bulk drug products between applicant-owned manufacturing sites and applicant-owned packaging sites. Why are the recommendations different for these similar situations?

A3: Information on container closure systems used for shipping (i.e., between applicant's own facilities or contract facilities) and bulk drug products, other than biologics or proteins, need not be included in the application. However, these container closure systems should be shown to be suitable for their intended use. The suitability of the storage containers should be supported by data retained by the applicant and/or manufacturer and should be made available during FDA inspection upon demand. Information as requested in section VI.B. of the packaging guidance on the container closure system for storage (shipping) of biologics and protein drug products, including container closure suitability, should be included in the application. This information should be provided for biologics and proteins because, in general, there is greater potential for adverse effects on the identity, strength, quality, purity, or potency of biologics and proteins during storage or shipping.