Technical Report No. 64

Active Temperature-Controlled Systems: Qualification Guidance



This is a preview of "PDA TR 64-2013". Click here to purchase the full version from the ANSI store.

PDA Active Temperature-Controlled Systems: Qualification Guidance Technical Report Team

Authors		
Karl Kussow, FedEx Custom Critical, Team leader	Suzan Lanz, Savient Pharmaceuticals, Inc.	
Anthony Bantug, Baxter BioScience	Gerry Marasigan, SNC-Lavalin Pharma	
John Bratz, Sensitech	Peter Mirabella, QProducts & Services	
Boriana Cavicchia, PricewaterhouseCoopers, LLC	Lisa Moher, Sanofi	
Alan Davis, Johnson & Johnson	Eric Newman, Falvey Cargo Underwriting	
John Dobbins, Pfizer	Richard Peck, Sensitech	
Chris Fore, Envirotainer	Mark Pietropola, Great American Lines, Inc.	
Geoffrey Glauser, Conceptual Mindworks Inc.	Chris Renz, Genentech	
Joel Glende, Abbott Laboratories	Edward J. Smith, Ph.D., Packaging Science Resources, LLC	
Jason Heberle, TCP Reliable	Dave Ulrich, Abbvie	
William Helsby, Novartis (Liverpool)	Erik J. van Asselt, Ph.D., Merck, Sharp & Dohme B.V. (MSD)	

PDA would like to acknowledge the contributions of **Phil DeSantis** (DeSantis Consulting Associates) and **Mike Long**, Ph.D. (ConcordiaValsource), who served as PDA Advisory Board subject-matter experts to this technical report team.

DISCLAIMER: The content and views expressed in this Technical Report are the result of a consensus achieved by the authorizing Technical Report Team and are not necessarily views of the organizations they represent.

This is a preview of "PDA TR 64-2013". Click here to purchase the full version from the ANSI store.

Active Temperature-Controlled Systems:

Qualification Guidance

Technical Report No. 64

ISBN: 978-0-939459-61-2 © 2013 Parenteral Drug Association, Inc. All rights reserved.



This is a preview of "PDA TR 64-2013". Click here to purchase the full version from the ANSI store.

Table of Contents

1.1 Purpose and Scope
1.2 Aircraft Cargo Compartments 1 2.0 GLOSSARY OF TERMS 2 2.1 Acronyms 4 3.0 OVERVIEW OF ACTIVE SYSTEM OPERATING CHARACTERISTICS 5 3.1 Temperature Control Unit System Components5 5 3.1 Temperature Control Unit System Components5 5 3.1 Temperature Control Unit System Components5 5 3.2 Operating Characteristics Affecting Qualification Affecting Qualification 6 3.2.1 Insulation 6 3.2.2 Airflow 6 3.2.3 Thermal Integrity 7 3.2.4 Capacity for Heat Exchange 7 3.2.5 Temperature Monitoring Systems 7 3.2.6 Alarms 8 3.3 Temperature Control Accuracy 8 3.4 Risk and Criticality Assessment of Systems 8 3.4.1 Risk Assessment 9 4.0 QUALIFICATION OF ACTIVE TEMPERATURE-CONTROLLED TRANSPORTATION SYSTEMS 12 4.1 Approach: Protocol Development 12 4.2 Design Qualification 13 4.3.1 Document Verification 14 4.3.2 Equipment Installation Verification 14 4.3.3 Preventative Maintenance
2.1 Acronyms 4 3.0 OVERVIEW OF ACTIVE SYSTEM OPERATING CHARACTERISTICS 5 3.1 Temperature Control Unit System Components5 3.1.1 Cooling and Heating Cycle: How it all works How it all works 5 3.2 Operating Characteristics Affecting Qualification 6 3.2.1 Insulation 6 3.2.2 Airflow 6 3.2.3 Thermal Integrity 7 3.2.4 Capacity for Heat Exchange 7 3.2.5 Temperature Monitoring Systems 7 3.2.6 Alarms 8 3.3 Temperature Control Accuracy 8 3.4 Risk and Criticality Assessment of Systems 8 3.4.1 Risk Assessment 9 4.0 OUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS 12 4.1 Approach: Protocol Development 12 4.2 Design Qualification 13 4.3 Installation Qualification 14
2.1 Acronyms 4 3.0 OVERVIEW OF ACTIVE SYSTEM OPERATING CHARACTERISTICS 5 3.1 Temperature Control Unit System Components5 3.1.1 Cooling and Heating Cycle: How it all works How it all works 5 3.2 Operating Characteristics Affecting Qualification 6 3.2.1 Insulation 6 3.2.2 Airflow 6 3.2.3 Thermal Integrity 7 3.2.4 Capacity for Heat Exchange 7 3.2.5 Temperature Monitoring Systems 7 3.2.6 Alarms 8 3.3 Temperature Control Accuracy 8 3.4 Risk and Criticality Assessment of Systems 8 3.4.1 Risk Assessment 9 4.0 OUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS 12 4.1 Approach: Protocol Development 12 4.2 Design Qualification 13 4.3 Installation Qualification 14
3.0 OVERVIEW OF ACTIVE SYSTEM OPERATING CHARACTERISTICS 3.1 Temperature Control Unit System Components 3.1.1 Cooling and Heating Cycle: How it all works 5 3.2 Operating Characteristics Affecting Qualification 6 3.2.1 Insulation 6 3.2.2 Airflow 6 3.2.3 Thermal Integrity 7 3.2.4 Capacity for Heat Exchange 7 3.2.5 Temperature Monitoring Systems 7 3.2.6 Alarms 3.3 Temperature Control Accuracy 8 3.4 Risk and Criticality Assessment of Systems 3.4.1 Risk Assessment 9 4.0 QUALIFICATION OF ACTIVE TEMPERATURE-CONTROLLED TRANSPORTATION SYSTEMS 4.1 Approach: Protocol Development 12 4.2 Design Qualification 13 4.3 Installation Qualification 14 4.3.2 Equipment Installation Verification 14 4.3.3 Preventative Maintenance 14 4.3
CHARACTERISTICS53.1 Temperature Control Unit System Components53.1.1 Cooling and Heating Cycle: How it all works53.2 Operating CharacteristicsAffecting Qualification63.2.1 Insulation63.2.2 Airflow63.2.3 Thermal Integrity73.2.4 Capacity for Heat Exchange73.2.5 Temperature Monitoring Systems73.2.6 Alarms83.3 Temperature Control Accuracy83.4 Risk and Criticality Assessment of Systems94.0 QUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS124.1 Approach: Protocol Development124.2 Design Qualification134.3 Installation Qualification144.3.2 Equipment Installation Verification144.3.3 Preventative Maintenance144.3.4 Calibration Verification154.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.2 Alarm Testing164.4.4 Temperature Controls Verification
CHARACTERISTICS53.1 Temperature Control Unit System Components53.1.1 Cooling and Heating Cycle: How it all works53.2 Operating CharacteristicsAffecting Qualification63.2.1 Insulation63.2.2 Airflow63.2.3 Thermal Integrity73.2.4 Capacity for Heat Exchange73.2.5 Temperature Monitoring Systems73.2.6 Alarms83.3 Temperature Control Accuracy83.4 Risk and Criticality Assessment of Systems94.0 QUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS124.1 Approach: Protocol Development124.2 Design Qualification134.3 Installation Qualification144.3.2 Equipment Installation Verification144.3.3 Preventative Maintenance144.3.4 Calibration Verification154.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.2 Alarm Testing164.4.4 Temperature Controls Verification
3.1 Temperature Control Unit System Components5 3.1.1 Cooling and Heating Cycle: How it all works
3.1.1 Cooling and Heating Cycle: How it all works
How it all works.53.2 Operating CharacteristicsAffecting QualificationAffecting Qualification63.2.1 Insulation63.2.2 Airflow63.2.3 Thermal Integrity73.2.4 Capacity for Heat Exchange73.2.5 Temperature Monitoring Systems73.2.6 Alarms83.3 Temperature Control Accuracy83.4 Risk and Criticality Assessment of Systems83.4.1 Risk Assessment94.0 QUALIFICATION OF ACTIVE TEMPERATURE-CONTROLLED TRANSPORTATION SYSTEMSCONTROLLED TRANSPORTATION SYSTEMS124.1 Approach: Protocol Development124.2 Design Qualification134.3.1 Document Verification144.3.2 Equipment Installation Verification144.3.3 Preventative Maintenance144.3.4 Calibration Verification154.4 Deparational Qualification154.4.1 Power Failure Recovery Testing164.4.3 SOP Verification164.4.4 Temperature Controls Verification16
3.2 Operating Characteristics Affecting Qualification 6 3.2.1 Insulation 6 3.2.2 Airflow 6 3.2.3 Thermal Integrity 7 3.2.4 Capacity for Heat Exchange 7 3.2.5 Temperature Monitoring Systems 7 3.2.6 Alarms 8 3.3 Temperature Control Accuracy 8 3.4 Risk and Criticality Assessment of Systems 9 4.0 QUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS 12 4.1 Approach: Protocol Development 12 4.1 Approach: Protocol Development 12 4.2 Design Qualification 13 4.3.1 Document Verification 14 4.3.2 Equipment Installation Verification 14 4.3.3 Preventative Maintenance 14 4.3.4 Calibration Verification 15 4.4 Operational Qualification 15 4.4.1 Power Failure Recovery Testing 16<
Affecting Qualification63.2.1Insulation63.2.2Airflow63.2.3Thermal Integrity73.2.4Capacity for Heat Exchange73.2.5Temperature Monitoring Systems73.2.6Alarms83.3Temperature Control Accuracy83.4Risk and Criticality Assessment of Systems83.4.1Risk Assessment94.0QUALIFICATION OF ACTIVE TEMPERATURE-CONTROLLED TRANSPORTATION SYSTEMS124.1Approach: Protocol Development124.2Design Qualification134.3.1Document Verification144.3.2Equipment Installation Verification144.3.3Preventative Maintenance144.3.4Calibration Verification154.4Operational Qualification154.4.1Power Failure Recovery Testing164.4.3SOP Verification164.4.4Temperature Controls Verification16
3.2.2Airflow
3.2.3 Thermal Integrity 7 3.2.4 Capacity for Heat Exchange 7 3.2.5 Temperature Monitoring Systems 7 3.2.6 Alarms 8 3.3 Temperature Control Accuracy 8 3.4 Risk and Criticality Assessment of Systems 8 3.4.1 Risk Assessment 9 4.0 OUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS 12 4.1 Approach: Protocol Development 12 4.2 Design Qualification 13 4.3 Installation Qualification 13 4.3.1 Document Verification 14 4.3.2 Equipment Installation Verification 14 4.3.4 Calibration Verification 15 4.4 Operational Qualification 15 4.4.1 Power Failure Recovery Testing 16 4.4.3 SOP Verification 16 4.4.4 Temperature Controls Verification 16
3.2.4 Capacity for Heat Exchange
3.2.5 Temperature Monitoring Systems
3.2.6 Alarms 8 3.3 Temperature Control Accuracy 8 3.4 Risk and Criticality Assessment of Systems 8 3.4 Risk and Criticality Assessment of Systems 9 4.0 QUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS 9 4.1 Approach: Protocol Development 12 4.2 Design Qualification 13 4.3 Installation Qualification 13 4.3.1 Document Verification 14 4.3.2 Equipment Installation Verification 14 4.3.3 Preventative Maintenance 14 4.3.4 Calibration Verification 15 4.4 Operational Qualification 15 4.4.1 Power Failure Recovery Testing 16 4.4.3 SOP Verification 16 4.4.4 Temperature Controls Verification 16
3.3 Temperature Control Accuracy 8 3.4 Risk and Criticality Assessment of Systems 8 3.4.1 Risk Assessment 9 4.0 QUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS 12 4.1 Approach: Protocol Development 12 4.2 Design Qualification 13 4.3 Installation Qualification 13 4.3.1 Document Verification 14 4.3.2 Equipment Installation Verification 14 4.3.3 Preventative Maintenance 14 4.3.4 Calibration Verification 15 4.4 Operational Qualification 15 4.4.1 Power Failure Recovery Testing 16 4.4.3 SOP Verification 16 4.4.4 Temperature Controls Verification 16
3.4 Risk and Criticality Assessment of Systems 8 3.4.1 Risk Assessment
3.4.1 Risk Assessment
4.0 QUALIFICATION OF ACTIVE TEMPERATURE- CONTROLLED TRANSPORTATION SYSTEMS 12 4.1 Approach: Protocol Development
CONTROLLED TRANSPORTATION SYSTEMS 124.1 Approach: Protocol Development
4.1 Approach: Protocol Development124.2 Design Qualification134.3 Installation Qualification134.3.1 Document Verification144.3.2 Equipment Installation Verification144.3.3 Preventative Maintenance144.3.4 Calibration Verification154.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.3 SOP Verification164.4.4 Temperature Controls Verification16
4.2 Design Qualification134.3 Installation Qualification134.3.1 Document Verification144.3.2 Equipment Installation Verification144.3.3 Preventative Maintenance144.3.4 Calibration Verification154.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.3 SOP Verification164.4.4 Temperature Controls Verification16
4.3 Installation Qualification134.3.1 Document Verification144.3.2 Equipment Installation Verification144.3.3 Preventative Maintenance144.3.4 Calibration Verification154.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.3 SOP Verification164.4.4 Temperature Controls Verification16
4.3.1Document Verification144.3.2Equipment Installation Verification144.3.3Preventative Maintenance144.3.4Calibration Verification154.4Operational Qualification154.4.1Power Failure Recovery Testing164.4.2Alarm Testing164.4.3SOP Verification164.4.4Temperature Controls Verification16
4.3.2 Equipment Installation Verification144.3.3 Preventative Maintenance144.3.4 Calibration Verification154.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.2 Alarm Testing164.4.3 SOP Verification164.4.4 Temperature Controls Verification16
4.3.3 Preventative Maintenance144.3.4 Calibration Verification154.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.2 Alarm Testing164.4.3 SOP Verification164.4.4 Temperature Controls Verification16
4.3.4 Calibration Verification154.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.2 Alarm Testing164.4.3 SOP Verification164.4.4 Temperature Controls Verification16
4.4 Operational Qualification154.4.1 Power Failure Recovery Testing164.4.2 Alarm Testing164.4.3 SOP Verification164.4.4 Temperature Controls Verification16
4.4.1Power Failure Recovery Testing
4.4.2Alarm Testing164.4.3SOP Verification164.4.4Temperature Controls Verification16
4.4.4 Temperature Controls Verification
1 1 5 Configurable Parameter Varification 17
4.4.5 Configurable Parameter Verification 17
4.4.6 Repeatability and Consistency
Considerations
4.4.7Acceptance Criteria174.4.8Reporting Criteria18
4.4.6 Reporting Citeria
4.5.1 Product Tests
4.5.2 Loaded Unit Temperature Uniformity 18
· · · ·
4.5.3 Open Door Recovery

4.6.1 Temperature Monitoring19	9
4.6.1.1 Bracketing Load Development 20	0
4.6.1.2 Mapping Product Temperatures vs. Air	
Temperatures20	
4.6.1.3 Locating Warm and Cold Spots 20	
4.6.1.4 Duration of Mapping Studies	
4.6.2 Periodic Review of Qualifications	1
4.6.3 Leased Assets 2	1
4.6.4 A Family Approach22	2
4.6.4.1 Defining an Active System Family 22	2
4.6.4.2 Process Controls23	3
4.6.4.3 Qualification of Active	
Temperature-Controlled	
Transportation System Families23	3
4.7 Comparisons of Similarities/Differences	
of the Four Active Transportation Systems2	5
5.0 TEMPERATURE-CONTROLLED	_
TRUCKS AND TRAILERS	
TRUCKS AND TRAILERS	7
TRUCKS AND TRAILERS	7 8
TRUCKS AND TRAILERS 2 5.1 System Description 2 5.2 Qualification 2	7 8 8
TRUCKS AND TRAILERS25.1 System Description25.2 Qualification25.2.1 Approach2	7 8 8 8
TRUCKS AND TRAILERS 2 5.1 System Description 2 5.2 Qualification 2 5.2.1 Approach 2 5.2.2 Design Qualification/Vendor Selection 2	7 8 8 8 8
TRUCKS AND TRAILERS 2 5.1 System Description 2 5.2 Qualification 2 5.2.1 Approach 2 5.2.2 Design Qualification/Vendor Selection 2 5.3 Installation Qualification 2	7 8 8 8 8
TRUCKS AND TRAILERS 2 5.1 System Description 2 5.2 Qualification 2 5.2.1 Approach 2 5.2.2 Design Qualification/Vendor Selection 2 5.3 Installation Qualification 2 5.3.1 Procedure Verification 2	7 8 8 8 8 8 9
TRUCKS AND TRAILERS 2 5.1 System Description 2 5.2 Qualification 2 5.2.1 Approach 2 5.2.2 Design Qualification/Vendor Selection 2 5.3 Installation Qualification 2 5.3.1 Procedure Verification 2 5.3.1.1 Trucks Used for Courier Routes 2 5.4 Operational Qualification 2 5.4.1 Power Loss/Recovery and Redundant	7 8 8 8 8 9 9
TRUCKS AND TRAILERS 2 5.1 System Description 2 5.2 Qualification 2 5.2.1 Approach 2 5.2.2 Design Qualification/Vendor Selection 2 5.3 Installation Qualification 2 5.3.1 Procedure Verification 2 5.3.1.1 Trucks Used for Courier Routes 2 5.4 Operational Qualification 2	7 8 8 8 8 9 9
TRUCKS AND TRAILERS 2 5.1 System Description 2 5.2 Qualification 2 5.2.1 Approach 2 5.2.2 Design Qualification/Vendor Selection 2 5.3 Installation Qualification 2 5.3.1 Procedure Verification 2 5.3.1.1 Trucks Used for Courier Routes 2 5.4 Operational Qualification 2 5.4.1 Power Loss/Recovery and Redundant	7 8 8 8 8 9 9 9
TRUCKS AND TRAILERS 2 5.1 System Description 2 5.2 Qualification 2 5.2.1 Approach 2 5.2.2 Design Qualification/Vendor Selection 2 5.3 Installation Qualification 2 5.3.1 Procedure Verification 2 5.3.1.1 Trucks Used for Courier Routes 2 5.4 Operational Qualification 2 5.4.1 Power Loss/Recovery and Redundant 2 System Testing 2	7 8 8 8 8 9 9 9

6.0 TEMPERATURE-CONTROLLED OCEAN

CONTAI	NERS	.31
6.1 How	Intermodal Temperature-Controlled	
Cont	ainers Work	. 31
6.1.1	Process Review and Qualification	. 32
6.2 Qual	ification of Technology	. 33
6.3 Proc	esses Affecting Container Performance	. 33
6.3.1	Pretrip Inspection	. 34
6.3.2	Loading and Transport to Sea Port	. 34
	Unloading at the Sea Port, Staging and	
	Customs Clearance	. 35
6.3.4	In-Transit	. 35
	Port of Arrival – Unloading, Customs	
	Clearance, and Delivery	
6.4 A No	ote on Insurance Liability and Security	. 36

7.0	ACTIVE	ULDS	37
	7.1 Des	ign	37
	7.1.1	Thermal Integrity	37
	7.1.2	Sufficient Heating/Cooling Capacity	37
	7.1.3	Airflow	37
	7.1.4	Temperature Control Accuracy	38
	7.1.5	Monitoring and Alarming Capability	38
	7.1.6	Redundant Capability	38
	7.1.7	Power Loss and Open Door Recovery	38
	7.1.8	Alarms	39
	7.2 Proc	cess Control of Active ULDs	39
8.0	TEMPEI	RATURE-CONTROLLED STORAGE	

WAREHOUSES/ROOMS40

8.1 Sy	vstem Description	40
8.2 Qi	alification	41
8.2.1	I Temperature Mapping	41
8.2.2	2 Load Used During Qualification	41
8.2.3	3 Controlling Devices	42
8.2.4	4 SOPs and Training	42
8.2.5	5 Summary	42
9.0 CONC	LUSIONS	47
10.0 REFERENCES49		
11.0 ADD	TIONAL SUPPORTING DOCUMENT	S50

FIGURES AND TABLES INDEX

Figure 3.1.1-1	Cooling and Heating Cycle5
Table 3.4.1-1	Risk-Based Qualification Planning with Typical Assessment Categories9
Figure 3.4.1-1	Risk-Based Qualification Approach to Determine Testing Requirements with Impact Assessment Triage
Table 3.4.1-2	Sample Assessment of Temperature Control System Impact and Component Criticality
Figure 4.2-1	Design Qualification Steps13
Table 4.6.4.1-1	Examples of Critical Factors for Temperature-Controlled Truck Systems
Table 4.6.4.2-1	Critical Process Controls23
Table 4.7-1	Typical Properties of the Four Active Transportation Systems
Table 4.7-2	Temperature Control Properties

Figure	6.1-1	Airflow in an Integral Refrigerated Container31
Figure	6.1.1-1	Ocean Shipping Transport Phases 33
Figure	7.0 -1	An Active ULD37
Figure	7.1.3-1	Airflow within an Active ULD
Figure	8.2.2-1	Cold Room Distribution Thermocouple or Stand-alone Recording Device Placement Diagram
Figure	8.2.5-1	Cold Room Penetration Thermocouple or Stand-alone Recording Device Placement Diagram43
Table 8	.2.5-1	Thermocouple or Stand-alone Recording Device Distribution List 44
Table 8	.2.5-2	Penetration Thermocouple or Stand-alone Recording Device Data Worksheet45

1.0 Introduction

1.1 Purpose and Scope

Fundamental to any temperature-controlled process is the expectation that materials that are stored and shipped within a controlled environment are maintained within a defined temperature range. Typically, this temperature range is within the recommended product storage requirements derived from stability data. The temperature within a temperature-controlled vehicle; temperature-controlled ocean container; active unit load device (ULD); or walk-in, temperature-controlled stores (e.g., a cold room, refrigerator, freezer, or standalone unit) is expected to be maintained:

- Reliably and consistently through the period in which the product is stored within the controlled environment (i.e., over time)
- In compliance with the product requirements for temperature at all locations in which the product might be stored (i.e., temperature and location or storage boundary)

The qualification process proves that the transportation system can consistently meet product temperature requirements. Strategies for conducting qualification studies should be based on the product's temperature and stability requirements as well as the transportation and storage process for that product.

Qualification is part of a validation program with a validation master plan (VMP) for the transportation system in question that defines the design qualification (DQ), installation qualification (IQ), operational qualification (OQ) and performance qualification (PQ) requirements. The VMP is discussed in more detail in **Section 4.0**.

This guidance discusses the process of qualifying actively controlled spaces that are designed to maintain a stable and uniform temperature around the cargo for the duration of transportation or storage at any temperature range. Specifically, this guidance addresses best practices for qualifying temperature-controlled trucks or trailers (hereafter referred to simply as "trucks"), temperature-controlled ocean containers, active ULDs, and walk-in temperature-controlled stores that are used to quarantine, hold, or store raw materials, intermediates, or products. It provides details on selected temperaturecontrolled units and their qualification testing, and it identifies best practices for performing and documenting the qualification activities, including temperature mapping studies, that are part of an overall validation program, whether that program is conducted by the pharmaceutical shipper or a service provider.

1.2 Aircraft Cargo Compartments

The environment of packages or freight in aircraft cargo compartments can be influenced by the transportation process. Transportation processes can be combined with other temperature-controlled packaging processes (active or passive) to help reduce the extremes of temperature for commodities during transit. In marketing their aircraft equipment and procedural controls, some air carriers are claiming that the aircraft cargo hold can serve as an active temperature-controlled system for cargo that is less sensitive to temperature variations (e.g., for products that are stable in a controlled room temperature range of 15°C to 25°C with allowable excursions). Although the temperature inside many current aircraft compartments can be regulated, aircraft themselves are not designed as temperature control systems. Thus, they are not discussed as such in this guidance.

Pharmaceutical shippers with cargo that is sufficiently stable to withstand the rigors of air travel without additional protection by an active container or passive packaging system should perform shipping temperature studies to ensure that process controls are sufficient to protect the product within the air planes used. Such studies are outside the scope of this guidance.