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Quality Assurance Status in Iranian Pharmaceutical Industry: A Survey

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ABSTRACT

Introduction: Critical role of quality assurance (QA) system in the pharmaceutical industry could affect on product quality, market development, customer satisfaction, and other element of a successful drug company.

Purpose of the Study: The main aim of this study is to evaluate of QA system, the relevant factors to the good manufacturing practice principles and detection of gap between knowledge and implementation of QA indices by their managers in pharmaceutical companies of Iran.

Method: This study contains designing a validated questionnaire with the expert panel and completing it in the pilot and final phases.

Results: This study have shown that there is a gap between knowledge of QA seniors and their practice in all categories of QA indices. Furthermore, it has been shown that measurement category has maximum gap. Moreover, machinery has minimum gap between all categories.

Conclusion: The status of QA managers' knowledge is appropriate, but implementation of QA indices in Iranian pharmaceutical industry is not appropriate.

Keywords: Quality assurance, good manufacturing practice, Iran, pharmaceutical industry

1. Introduction

Quality assurance (QA) is a general concept that covering everything which affect directly or indirectly on product quality [1,2]. Within the pharmaceutical organization, the approach to quality is defined by the quality policy, which sets out the governance of the organization with respect to quality [2]. The body that ensures that the quality policy is achieved throughout the organization is the QA function, thus ensure that the finished products are of a consist quality standard [1].

Good manufacturing practice (GMP) as a tool that could help QA system to surveillance on consistency of product quality. It has been presented by some regulation organizations and guidelines like Code of Federal Regulation, Pharmaceutical Inspection Co-operation Scheme (PIC/S), World Health Organization (WHO) guideline, and International Conference of Harmonization. These guidelines have been kept up date by their organization. They are main sources for pharmaceutical companies and their QA systems to improve the quality of products [1,2].

QA plays a central and influential role within the operations of the pharmaceutical industry. This multi-facet function spans its influence over the total operations by defining standards and regulations that govern the highly sensitive pharmaceutical industry [1].

QA department is responsible for releasing a product (via finished or intermediate) and approving or rejecting all products and materials, such as starting materials, packaging and labeling materials, in-process materials, product containers, bulk, and finished products [3].

The common misconception is to think that QA and quality control (QC) are the same when describing product or service management. Quality is synonyms with agreed high levels of excellence of product or service offering in line with the quality policy. QA compares the products and services against the set standards, whilst QC ensures that the said subjects are within the agreed specification and targets [4].

The quality journey has evolved significantly since its humble beginning in the 13th century guilds in medieval Europe. Six hundred years later, this approach to consistent production through deliberate inspection, was incorporated into industrial revolution in Great Britain. The positive approach and attitudes to have quality in the early part of 20th century was demonstrated by the fact that quality processes

existed within the arena of manufacturing.

It took significant defining point in the world history, mainly, the second war to ensuring that the quality conscious rebuilding Japanese industries were in direct competition with United States mass production industries. The sense of competition through quality lead to American pioneers Joseph Juaran and Edward Demings modified the Japanese approach and obsession to inspection by concentrating on improving management processes for the American industrial sectors. In mid-1970s, the improving Japanese products superior consistent quality meant that the concept of total quality management (TQM) was successfully introduced with the US, significantly improving quality production, whereas the TQM process faded away toward the end of the 20th century, the concept has subsequently evolved to encompass many other private and public sector areas [5,6].

The Iranian pharmaceutical market has been regulated through the governmental institutions, which has been based on a law that has passed by the parliament in 1955. In the recent years, there is an additional pressure to introduce measures to improve the overall quality (via QA and system) which has to be balanced against the challenges of lowering the overall costs [7].

Critical role of QA in the pharmaceutical industry is the main reason to develop this study. This paper aims to provide insight into the approach and attitudes of the QA managers within the selected pharmaceutical companies in Iran to have quality and identify the gaps between theory and practice.

2. Method

This is a cross-sectional study, which uses situational analysis to find out the gap between the actual situation and what should be established about QA system. This questionnaire is based on a study. Thus, design and development an effective questionnaire is the most important step in this research.

A valid and reliable questionnaire helps well to collect of information about knowledge, attitudes, opinions, behaviors, etc. [8]. Review of literature, guidelines and findings the indices of QA are the inception for designing the questionnaire. However, transforming this

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information into the pertinent and correct questions needs enough knowledge of the subject matter. According to the policy of Iranian Ministry of Health (MOH) and emphasis of it on PIC/S guideline, preparation of this questionnaire is done with a focus on stated guideline. In addition, due to the situation of Iranian pharmaceutical industry and conformity with WHO policies, this guideline has been also used in designing of the questionnaire.

Preparing the questionnaire is done by the corporation of some experts (n = 3) of the industry and university. The size of expert group used in the questionnaire survey is variable [9]. There are a number of same studies in which the expert panel has been quite small [10].

Selecting samples were the initial step in this project. Selection of these samples (n = 17) is based on some criteria such as type of the products, ownership situation, size of companies, etc. However, all the companies which have been investigated in this study have been a manufacturer of finished products. It must be said that three companies of this study sample did not answer to the questionnaire, and the response rate in this study was 82%.

The pilot study has been implemented in the 1-year period (2009-2010) in five pharmaceutical companies. In this phase, interviewing with QA managers, filling the questionnaire and taking their advice about questionnaire helps us to modify the questionnaire.

The next step of this study has been the validation of the questionnaire with using an expert panel. In the expert panel, some skillful persons (n = 3) who were working in the pharmaceutical industry, judged about correction and efficiency of the questionnaire. After implementation of the pilot phase and using the expert panel, the questionnaire finalized. However, the final version of the questionnaire is almost similar with the first version. The final version of questionnaire contains 99 interval/ratio scale (0-5) question about the importance and performance of QA indices. After modification and validation of questionnaire, final phase of fulfilling of the questionnaire has been done in a period of 2-years (2011-2012). In this phase, the questionnaire filled in the remained companies (n = 9). Finally, all data, which have been collected in this research, analyzed. At last, we could find out situation of knowledge, behavior and find present gap between these factors.

3. Results and Discussion

Reporting the result of this study is based on the "cause and effect diagram" (6M) which has been categorized all questions in six groups.

"Manpower" category (human resources and organizational structure). "Machinery" category (equipment and technology). "Milieu" category (environment). "Material" category (active pharmaceutical substances and finished products). "Method" category. "Measurement" category (self-inspection, validation, qualification, and analytical methods).

It has been shown in table 1, part of human resources and organizational structure (manpower categories), in 64% of cases, a significant gap between knowledge of QA seniors and their practice has been detected. However, it sounds that implementation of QA/QC independency, standard operation procedure (SOP) for visitors and personnel training in Iranian pharmaceutical company are appropriate. The status of other elements of this category is not well-enough.

The results obtained from some issues like job description, on-the-job training, availability of quality manual for personnel, SOPs for limiting access to premises, physical examination before employment, compliance of personnel clothing to GMP and access control system for warehouses shown that there is a significant gap between knowledge and practice in this areas. In addition, the biggest gap in this category is related to "A system for access control of warehouses" and "SOP" for access control to premises". Thus, it could be expressed that there is not an appropriate access control system for all of the premises in Iranian pharmaceutical industry.

One of the issues in this area is the training of personnel hygiene, GMP principles for all personnel and the training of the technical staffs. The average of the importance of each statement was 4.92 and the average of the amount of its implementation was 4.35, which has shown significant gap between knowledge and implementation of the issue. There is also a need for designing retraining courses in pharmaceutical company according to the average of importance and implementation through the evaluation process that have been giving out the company for the proposition (4.78 and 3.71, respectively). In comparison with significance level of 0.26 that shows a gap between knowledge and level of implementation in this issue.

Table 1. Average of knowledge	and implementation and	significance level of man	power category indices:	confidence interval = 95%
- more			power conception,	

Manpower category indices	Number of companies	Mean	Standard deviation	Significant	NC type	RPN
Job description						
Importance	14	4.8571	0.53452	0.318	М	0.212
Implementation		4.0714	1.07161			
QÂ independency						
Importance	14	4.7857	0.57893	0.000	-	0
Implementation		4.3571	1.15073			
SOP for access control to premises						
Importance	14	4.7857	0.42582	0.534	Ν	0.177
Implementation		4.0714	1.20667			
System for access control of warehouses						
Importance	14	4.7143	0.61125	0.594	Ν	0.198
Implementation		3.3571	1.15073			
Availability of quality manual for personnel						
Importance	14	4.7143	0.61125	0.382	Ν	0.127
Implementation		4.4286	0.85163			
Physical examination before employment						
Importance	14	4.6429	0.49725	0.488	С	0.488
Implementation		3.5000	1.91150			
Personnel clothing complying with GMP						
Importance	14	4.9286	0.26726	0.447	С	0.447
Implementation		4.5000	0.65044			
SOP for visitors						
Importance	14	4.2857	1.13873	0.003	-	0
Implementation		3.7857	1.18831			
Personnel training						
Importance	14	4.9286	0.26726	0.019	-	0
Implementation		4.3571	0.63332			
On-the-job training						
Importance	14	4.7857	0.42582	0.262	Μ	0.174
Implementation		3.7143	1.20439			
QC independency						
Importance	14	4.9279	0.26707	0.000	-	0
Implementation		4.9286	0.26726			

C: Critical non-conformity; M: Major non-conformity; N: Minor non-conformity; QA: Quality assurance; RPN: risk priority number; NC: Non-conformity

SOP: Standard operation procedure; QC: Quality control

	Table 2. Average of knowledge and im-	plementation and significance level of machinery	y category indices; confidence interval = 95%
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Machinery category indices	Number of companies	Mean	Standard deviation	Significant	NC type	RPN
Using compatible lubricant with product	•			0		
Importance	14	4.7857	0.42582	0.685	М	0.456
Implementation		4.2143	0.97496			
Compatibility of equipment surface with product						
Importance	14	4.6429	0.63332	0.005	-	0
Implementation		3.7143	1.13873			
Equipment log book						
Importance	14	4.7143	0.46881	0.522	Ν	0.174
Implementation		4.0000	0.87706			
Efficient HVAC system						
Importance	14	4.7857	0.42582	0.480	С	0.480
Implementation		3.4286	1.50457			
Preventive maintenance						
Importance	14	4.6429	0.63332	0.786	М	0.524
Implementation		3.0000	1.51911			
Electronic system backup						
Importance	14	4.8571	0.36314	0.284	Ν	0.094
Implementation		3.3571	1.86495			
Equipment ID code						
Importance	14	4.5714	0.75593	0.916	Ν	0.305
Implementation		3.5714	1.39859			
Dust reduction system						
Importance	14	4.8571	0.36314	0.612	М	0.408
Implementation		3.4286	1.22250			
Air-lock system						
Importance	14	4.7857	0.42582	0.036	-	0
Implementation		4.0000	0.96077			
GMP compatible sampling tools						
Importance	14	4.7857	0.42582	0.014	-	0
Implementation		4.4286	0.64621			
Filling and sealing of finally sterilized parenteral in class						
A with background class C (at least)						
Importance	8	4.8750	0.35355	0.017	-	0
Implementation		4.5000	0.75593			
Filling and sealing of parenteral with aseptic process in						
class A with background class B						
Importance	8	4.8750	0.35355	0.033	-	0
Implementation		4.3750	0.74402			

C: Critical non-conformity; M: Major non-conformity; N: Minor non-conformity; RPN: Risk priority number; NC: Non-conformity; HVAC: Heating ventilating and air conditioning GMP: Good manufacturing practice, ID: Identification

There are some grades of similarities in the result of this part to the study [11] which has been performed the knowledge of pharmacists and drug sellers by a questionnaire in Pakistan that has been based on a survey. This study has shown that most of the drug sellers have not appropriate information about prescriptions and storage conditions of medications.

It has been demonstrated that a significant gap between knowledge of QA seniors and their practice existed in 58.4% of machinery category cases (Table 2) (equipment and technology). It means that there is a gap between knowledge and practice in some issues. Using compatible lubricant with product, equipment log book, designing an efficient heating ventilating and air conditioning, preventive maintenance (PM), electronic system backup, equipment identification (ID) code and dust reduction system are examples of this issue. Also, there is not a significant gap between knowledge and implementation in some issues like compatibility of equipment surface with GMP, filling and sealing of finally sterilized and aseptic process products, air-lock system and GMP compatible sampling tools. It must be said that, maximum gap between knowledge and practice in machinery category was detected in "equipment ID code" and "PM". Thus, it could be said that the gap between knowledge and practice of machinery issues are not caused by lack of appropriate equipment and technology. Also, it could be refer to the absence of some documents such as equipment ID code and schedule for maintenance of them.

This issue for environment (Milieu category) was 66.6% (Table 3). Furthermore, a gap has been shown (64.3% of cases) in active pharmaceutical substances and finished products issues (material category) (Table 4).

The existent gap in milieu category has been rooted in some issues like flow of material, personnel and process, designing of production area which is easily cleanable. GMP compatibility of premises surface, consideration to prevention of cross-contamination in weighing area, Environmental monitoring for production area, separation of QC labs from the production area, protection of biological and microbiological labs, pest-control system and using high efficiency particulate air (HEPA) filters in the exhaust of the hazardous product lines. In addition, Iranian pharmaceutical companies have worst practice in "protection of biological, microbiological labs" and "environmental monitoring for production area". Also, defects in "environmental monitoring for production area" could be caused by lack of appropriate technology; the weak practice in the issue of "protection of biological and microbiological labs" mostly might refer to shortage of sufficient area for appropriate separation of them.

In material category; there was a significant gap between QA seniors' knowledge and their practice in some issues such as QA approval for reprocess and rework, SOP's for sampling, determination of storage condition on sample labels, prevention of sample mix-up, performing ID test for all containers of starting materials, cleaning containers' surface before enter to the warehouses, control and monitoring of material storage condition, separation storage area of narcotics and flammable material in warehouses and distribution of product through authorized companies. Also, it has been demonstrated that implementation of "performing ID test for all containers of starting materials" and "prevention of samples mix-up" are the worst cases in this category. Notwithstanding, "performing ID test for all containers of starting materials" is the obvious GMP principle, because of financial cost, there is not appropriate practice in this issue in Iranian pharmaceutical industry.

As it has shown in table 5, issues of "method", in 66.6% of cases, there was a significant difference between knowledge and practice of QA seniors. Existing gaps in implementation of quality management tools could be affected product quality. This weakness could be seen in

trend analysis and product quality review (one of the item that having a high gap), corrective and preventive actions (CAPA) and change control management (Table 5).

Some of the relevant issues to the documentation like preparing of batch processing records and unavailability of obsolete documents have not been properly implemented in Iranian pharmaceutical market. Also, there was not significant gap between QA seniors' knowledge and their practice in the other elements of documentation (Table 5).

Customer complaint handling and using of an appropriate recall system are very important issues for customer satisfaction and improving of company credit in different industry, product recall system with the average importance of 4.92 and average implementation of 4.00 for companies (significance level = 1) in this study, shows a high gap (maximum gap in this category) between knowledge and implementation. It was shown in a 6-year period study [12] in China (2002-2008), 29 cases of product recall from different fields of industry (food, pharmaceuticals, electronics, and automobile). Also, it has been

shown that Chinese companies in the food industry experienced more severe reactions from their recall announcements, while companies in the automobile industry experienced a less severe reaction. It is important to consider the concern of product recall in the pharmaceutical industry.

Another noticeable issue in this part is, considering authority for contract giver to audit contract acceptor facilities. The result revealed average importance of 4.21 and average implementation of 3.42 for companies (significance level of 0.016), which has not shown gap between knowledge and implementation. Besides, it has been demonstrated that there is a significant gap (biggest gap in this category) between knowledge and practice of QA managers in the definition of responsibility in contract manufacturing and providing sufficient documentation to prove eligibility for contract manufacturing companies.

There is also a study in Finland which demonstrated to prepare a tool (a valid questionnaire) by Delphi method for inspection of contract acceptor [13].

Table 3. Average of knowledge and implementation	and significance level of Milieu categor	y indices;	confidence interval = 95%	
Milieu category indices	Number of companies	Mean	Standard deviation	Si

Milieu category indices	Number of companies	Mean	Standard deviation	Significant	NC type	RPN
Flow of material, personnel and process						
Importance	14	4.6429	0.63332	0.277	М	0.184
Implementation		3.7143	0.61125			
Designing production area which is easily cleanable						
Importance	14	4.8571	0.36314	0.125	М	0.083
Implementation		3.6429	0.63332			
Designing production area which is preventing cross-						
contamination						
Importance	14	4.9993	0.00267	0.010	-	0
Implementation		3.5000	0.65044			
GMP compatibility of premises surfaces						
Importance	14	4.7857	0.42582	0.252	М	0.168
Implementation		3.8571	0.86444			
Considering prevention of cross-contamination in weighing						
area						
Importance	14	4.7857	0.42582	0.138	С	0.138
Implementation		4 5000	0.65044			
Environmental monitoring for production area			0102011			
Importance	14	4 6429	0 49725	0 506	Ν	0 168
Implementation		4 2857	1 13873	01000		0.100
Separation of ancillary places from production OC and		1.2007	1.15075			
warehousing area						
Importance	14	4.5714	0.64621	0.017	-	0
Implementation		3 5714	1 22250	01017		Ũ
Separation of OC labs from production area		01071	1122200			
Importance	14	4 7143	0.46881	0.185	м	0.123
Implementation	17	4.0714	0.99725	0.105	101	0.125
Protection of biological and microbiological labs		4.0714	0.99725			
Importance	14	1 0003	0.00267	0.735	м	0.490
Implementation	14	4.2857	0.82542	0.755	141	0.470
Container and area labeling in warehouses		4.2037	0.02542			
Importance	14	4 5000	1 59114	0.003		0
Implementation	14	4.3000	1.30114	0.003	-	0
Semanate lowe day with switchle facilities		4.0000	1.09907			
	1.4	1 7770	0.44006	0.044		0
	14	4.///8	0.44096	0.044	-	0
		4.1111	0.92790			
Pest-control system			0.10500	0.45		0.015
Importance	14	4.7857	0.42582	0.476	Μ	0.317
Implementation		3.7143	0.99449			
Compatibility of drain design with GMP						
Importance	14	4.9286	0.26726	0.080	М	0.053
Implementation		4.4286	0.85163			
Separation of premises and HVAC system for sensitizing and						
hazardous products						
Importance	9	4.8571	0.36314	0.000	-	0
Implementation		4.7143	0.61125			
Using HEPA filters in the exhaust of the sensitizing and						
hazardous product lines						
Importance	10	4.9286	0.26726	0.282	С	0.282
Implementation		4.0714	0.99725			

C: Critical non-conformity; M: Major non-conformity; N: Minor non-conformity; RPN: Risk priority number; NC: Non-conformity; GMP: Good manufacturing practice

QC: Quality control; HVAC: Heating ventilating and air conditioning; HEPA: High efficiency particulate air

Yield calculation for processes, considering time limitation and preventing of gang-printing are other issues which have been observed that there is a gap between knowing and applying of them in Iranian pharmaceutical industry. Moreover, it has been observed that "yield calculation for process" have high gap in this categories.

Trend analysis and product quality review (one of the item that having a high gap), CAPA, change control management, preparing of batch processing records and unavailability of obsolete documents, have been considered.

As shown in table 6, issue of the "measurement", in 85% of cases, there was a significant difference between knowledge and practice of QA seniors. The result revealed that there is a significant gap between knowledge and implementation of self-inspection, validation principles,

calibration and qualification. The significance level in most issues of this category has shown that the major defects are in some relevant issues of validation, calibration, and qualification.

Furthermore, it has been observed that there is a significant gap between knowledge and practice of some issues such as integrity test for HEPA filters during installation, daily verification of balances, analytical method validation, stability study, post marketing surveillance, system suitability, documentation of lab data, monitoring of pharmaceutical water. However, there is not significant gap in others issues of this category, such as, integrity test for sterilized filters, storage condition of samples, lab standards, testing method according to marketing authorization license and reporting of out of the specification to QA unit.

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Container bieling and identificationI4.9993 4.9993 4.0026770.003Implementation4.35710.92878QA approval for reproces and reworkImportance144.92860.26726 6.0727M0.088Implementation3.50001.45444Reprocess complies marketing authorization license	Material category indices	Number of companies	Mean	Standard deviation	Significant	NC type	RPN
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Implementation4.35710.92878QA approval for reprocess and rework	Importance	14	4.9993	0.00267	0.003	-	0
QA approval for reprocess and rework.144.92860.267260.072M0.048Implementation3.50001.45444Reprocess complies marketing authorization license144.21431.805060.013-0.0Implementation14.21431.805060.013-0.0SOPs for sampling3.92860.99725Importance14.45290.497250.379M0.482Importance14.71430.468810.679M0.488Implementation4.14290.77033Prevention of storage condition on sample labelsImportance14.71430.468810.679M0.4699Inportance14.71430.461250.699C0.699Inportance14.71430.468810.865M0.576Importance14.71430.468810.865M0.703Importance14.71430.468810.865M0.703Importance14.71430.468810.865M0.703Importance14.71430.468810.865M0.703Importance14.71430.468810.599M0.701Importance14.71430.468810.599M0.702Importance14.57140.75730.000-0.702 <t< td=""><td>Implementation</td><td></td><td>4.3571</td><td>0.92878</td><td></td><td></td><td></td></t<>	Implementation		4.3571	0.92878			
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Implementation3.50001.45444Reprocess complies marketing authorization license144.21431.805060.013-0Implementation307141.979290.379M0.252SO's for sampling322860.997250.379M0.252Implementation3.22860.997250.379M0.452Importance144.71430.468810.679M0.448Implementation4.124290.7073Importance144.71430.611250.699C0.699Implementation4.42490.6332Prevention of samples mix-upImplementation4.71430.646810.865M0.576Implementation144.71430.468810.865M0.757Implementation144.71430.468810.259M0.712Implementation144.71430.468810.259M0.72Implementation4.57140.57630.609-0.72Implementation4.57140.57630.609-0.72Implementation4.57140.575930.609M0.72Implementation4.74370.468810.259M0.72Implementation4.74370.57830.699M0.72Implementation4.74870.57830.699M0.672 </td <td>Importance</td> <td>14</td> <td>4.9286</td> <td>0.26726</td> <td>0.072</td> <td>М</td> <td>0.048</td>	Importance	14	4.9286	0.26726	0.072	М	0.048
Representation144.21310.80500.013.*0Impermentation3.07141.97020.713N0.252SOPs for sampling3.22860.997250.379M0.252Impermentation3.22860.997250.879M0.452Determination of storage condition on sample labels14.14290.7033M0.468Impermentation4.14290.7703110.6680.697M0.468Impermentation4.14290.71330.669M0.6930.697M0.693Prevention of samples mix-up14.14290.63332110.6980.697M0.563Impermentation4.14290.631330.668M0.5610.699M0.561Impermentation4.71430.468810.665M0.5760.576Impermentation4.71430.468810.665M0.576Impermentation4.71430.468810.561M0.576Impermentation4.72450.57593M0.576Impermentation4.78470.57593M0.572Impermentation4.74860.57593M0.572Impermentation4.74870.57593M0.572Impermentation4.74860.57593M0.572Impermentation4.74870.563140.679M0.521Impermentation4.78470.563140.601 </td <td>Implementation</td> <td></td> <td>3.5000</td> <td>1.45444</td> <td></td> <td></td> <td></td>	Implementation		3.5000	1.45444			
Importance144.21.431.807060.013-0Implementation3.07141.807090.013-0SOPs for sampling14.64290.497250.379M0.252Implementation3.02860.907250.379M0.452Imperance144.71430.468810.679M0.448Imperance144.71430.66810.679M0.448Implementation4.41290.70330.699Imperance144.71430.611250.699C0.699Imperance144.71430.66810.865M0.576Importance144.71430.468810.865M0.576Importance144.71430.468810.865M0.576Importance144.71430.468810.865M0.576Importance144.71430.468810.259M0.576Importance144.71430.468810.259M0.170Importance144.71430.468810.259M0.172Importance144.71430.468810.259M0.172Importance144.71430.468810.259M0.172Importance144.71430.458810.259M0.172Importance144.71430.4581630.601-0.55Importance<	Reprocess complies marketing authorization license						
Implementation3,07141,97929SOPs for samplingInportance0,497250,379M0,252Implementation3,92860,997250,379M0,252Determination of storage condition on sample labelsII <t< td=""><td>Importance</td><td>14</td><td>4.2143</td><td>1.80506</td><td>0.013</td><td>-</td><td>0</td></t<>	Importance	14	4.2143	1.80506	0.013	-	0
SOPs for sampling 14 4.4280 0.49725 0.379 M 0.252 Implementation 3.2926 0.99725 Determination of storage condition on sample labels 0.46881 0.679 M 0.4488 Implementation 4.1429 0.7033	Implementation		3.0714	1.97929			
Importance 14 4.6429 0.49725 0.379 M 0.252 Implementation 0.3926 0.99723 Importance 14 4.7143 0.46881 0.679 M 0.448 Implementation 4.1429 0.77033 0.679 M 0.448 Implementation 4.6429 0.6332 0.699	SOPs for sampling						
Implementation3.92860.99725Determination of storage condition on sample labels	Importance	14	4.6429	0.49725	0.379	М	0.252
Determination of storage condition on sample labelsImportance144.71430.468810.679M0.488Implementation1.41290.70733Prevention of samples mix-up144.71430.611250.699C0.699Implementation4.64290.63332 </td <td>Implementation</td> <td></td> <td>3.9286</td> <td>0.99725</td> <td></td> <td></td> <td></td>	Implementation		3.9286	0.99725			
Importance144.71430.468810.679M0.448Implementation4.14290.77033Prevention of samples mix-up4.14290.611250.699C0.699Implementation4.64290.6332Performing ID test for all containers of starting materialsImportance144.71430.468810.865M0.576Implementation4.71430.468810.865N0.707Implementation4.71430.468810.251N0.172Implementation4.57140.646810.259M0.172Importance144.71430.468810.259M0.172Importance144.71430.468810.259M0.172Importance144.71430.468810.259M0.172Importance144.71430.468810.259M0.172Importance144.71430.468810.259M0.172Importance144.71430.468810.259M0.172Importance144.71430.468810.269M0.452Importance144.57140.57893Importance144.57140.363140.679M0.452Importance144.57140.36314 <td>Determination of storage condition on sample labels</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>	Determination of storage condition on sample labels						
Implementation4.14290.77033Prevention of samples mix-up	Importance	14	4.7143	0.46881	0.679	М	0.448
Prevention of samples mix-upIntervention of samples materialsIntervention of samples materia	Implementation		4.1429	0.77033			
Importance144.71430.611250.699C0.699Implementation4.64290.3332 <td< td=""><td>Prevention of samples mix-up</td><td></td><td></td><td></td><td></td><td></td><td></td></td<>	Prevention of samples mix-up						
Implementation 4.6429 0.63332 Performing ID test for all containers of starting materials 14 4.7143 0.46881 0.865 M 0.576 Implementation 4.7143 0.46881 0.865 M 0.576 Cleaning containers' surface before enter to the warehouses 14 4.9286 0.26726 0.513 N 0.170 Importance 14 4.9286 0.66621 14 0.66881 0.259 M 0.172 Importance 14 4.7143 0.46881 0.259 M 0.172 Importance 14 4.7143 0.46881 0.259 M 0.172 Importance 14 4.7143 0.46881 0.259 M 0.172 Implementation 4.7857 0.57893 0.000 - 0 Implementation 4.8571 0.75793 0.000 - 0 Separation storage area of narcotics and flammable material 685163 0.679 M 0.452 Implementation 4.8571 0.36314 0.001 - 0 0 <tr< td=""><td>Importance</td><td>14</td><td>4.7143</td><td>0.61125</td><td>0.699</td><td>С</td><td>0.699</td></tr<>	Importance	14	4.7143	0.61125	0.699	С	0.699
Performing ID test for all containers of starting materials Importance 14 4.7143 0.46881 0.865 M 0.576 Importance 1.7143 0.46881 0.865 M 0.576 Cleaning containers' surface before enter to the warehouses 14 4.9286 0.26726 0.513 N 0.701 Implementation 4.5714 0.64621 14 0.57893 14 0.712 Control and monitoring of material storage condition 14 4.7143 0.64681 0.259 M 0.712 Implementation 14 4.7143 0.64681 0.259 M 0.72 Implementation 4.5714 0.67893 M 0.72 Implementation 4.5714 0.75593 0.000 - 0 Implementation 4.4286 0.85163 - - 1 Separation storage area of narcotics and flammable material in warehouses 4.6429 0.49725 - 1 Implementation 4.6429 0.49725 - - 0 - 0 Implementation 4.6429 0.49725	Implementation		4.6429	0.63332			
Importance 14 4.7143 0.46881 0.865 M 0.576 Implementation 4.7143 0.46881	Performing ID test for all containers of starting materials						
Implementation 4.7143 0.46881 Cleaning containers' surface before enter to the warehouses 14 4.9286 0.26726 0.513 N 0.170 Implementation 4.5714 0.6621 14 0.6621 150 N 0.170 Control and monitoring of material storage condition 14 4.7143 0.46881 0.259 M 0.172 Implementation 4.7857 0.57893 11	Importance	14	4.7143	0.46881	0.865	М	0.576
Cleaning containers' surface before enter to the warehouses 14 4.9286 0.26726 0.513 N 0.170 Importance 4.5714 0.64621 0.259 M 0.172 Control and monitoring of material storage condition 4.7143 0.46881 0.259 M 0.172 Importance 4.7857 0.57893 0 M 0.172 Implementation 4.7857 0.57893 0 M 0.172 Warehousing comply with FEFO/FIFO systems 4.4286 0.85163 0 M 0.152 Separation storage area of narcotics and flammable material in warehouses 4.4286 0.85163 0 M 0.452 Implementation 4.6429 0.49725 M 0.452 0 0.001 - 0 Implementation 4.6429 0.49725 M 0.452 0.011 - 0 Implementation 4.6429 0.49725 M 0.452 0 0.01 - 0 Implementation 4.6429 0.49725 M 0.452 0 0 0 0 0	Implementation		4.7143	0.46881			
Importance 14 4.9286 0.26726 0.513 N 0.170 Implementation 4.5714 0.64621 N 0.170	Cleaning containers' surface before enter to the warehouses						
Implementation 4.5714 0.64621 Control and monitoring of material storage condition 14 4.7143 0.46881 0.259 M 0.172 Importance 14 4.7157 0.57893 M 0.122 Warehousing comply with FEFO/FIFO systems 4.7857 0.57893 M 0.000 - 0 Importance 14 4.5714 0.75593 0.000 - 0 Importance 14 4.5714 0.75593 0.000 - 0 Importance 14 4.5714 0.75593 0.000 - 0 Importance 14 4.5714 0.36314 0.679 M 0.452 Importance 14 4.8571 0.36314 0.001 - 0 Implementation 4.6429 0.49725 - - 0 Implementation 4.7857 0.26314 0.001 - 0 Implementation 4.7857 0.42582 - - 0 Implementation 3.8571 0.86444 - 0 0	Importance	14	4.9286	0.26726	0.513	Ν	0.170
Control and monitoring of material storage condition Importance 14 4.7143 0.46881 0.259 M 0.172 Implementation 4.7857 0.57893	Implementation		4.5714	0.64621			
Importance 14 4.7143 0.46881 0.259 M 0.172 Implementation 4.7857 0.57893	Control and monitoring of material storage condition						
Implementation 4.7857 0.57893 Warehousing comply with FEFO/FIFO systems 14 4.5714 0.75593 0.000 - 0 Importance 14 4.5714 0.75593 0.000 - 0 Implementation 4.4286 0.85163 - - 0 Separation storage area of narcotics and flammable material in warehouses - <td>Importance</td> <td>14</td> <td>4.7143</td> <td>0.46881</td> <td>0.259</td> <td>М</td> <td>0.172</td>	Importance	14	4.7143	0.46881	0.259	М	0.172
Warehousing comply with FEFO/FIFO systems 14 4.5714 0.75593 0.000 - 0 Importance 4.4286 0.85163 - - 0 Separation storage area of narcotics and flammable material in warehouses -	Implementation		4.7857	0.57893			
Importance 14 4.5714 0.75593 0.000 - 0 Implementation 4.4286 0.85163 - - 0 Separation storage area of narcotics and flammable material in warehouses - 4.4286 0.85163 - - 0 Importance 14 4.8571 0.36314 0.679 M 0.452 Implementation 4.6429 0.49725 - - 0 Separation storage area of quarantine and rejected material - 4.6429 0.49725 - 0 Importance 14 4.8571 0.36314 0.001 - 0 Implementation 4.7857 0.42582 - - 0 Separation storage area of waste material according to SOP - - 0 - 0 Implementation 14 4.5714 0.85163 0.048 - 0 Implementation 3.8571 0.86444 - - 0 - Istribution of product via author	Warehousing comply with FEFO/FIFO systems						
Implementation 4.4286 0.85163 Separation storage area of narcotics and flammable material in warehouses 5 Importance 14 4.8571 0.36314 0.679 M 0.452 Implementation 4.6429 0.49725 1	Importance	14	4.5714	0.75593	0.000	-	0
Separation storage area of narcotics and flammable material in warehouses Importance 14 4.8571 0.36314 0.679 M 0.452 Implementation 4.6429 0.49725 0.49725 0.49725 0.901 - 0 Separation storage area of quarantine and rejected material 14 4.8571 0.36314 0.001 - 0 Implementation 14 4.8571 0.36314 0.001 - 0 Implementation 4.7857 0.42582 - - 0 Separation storage area of waste material according to SOP 14 4.5714 0.85163 0.048 - 0 Implementation 3.8571 0.86444 - 0 0 - 0 Implementation 14 4.8571 0.36314 0.368 M 0.245	Implementation		4.4286	0.85163			
Importance 14 4.8571 0.36314 0.679 M 0.452 Implementation 4.6429 0.49725	Separation storage area of narcotics and flammable material in warehouses						
Implementation 4.6429 0.49725 Separation storage area of quarantine and rejected material 14 4.8571 0.36314 0.001 - 0 Importance 14 4.8571 0.36314 0.001 - 0 Implementation 4.7857 0.42582 - - 0 Separation storage area of waste material according to SOP - - 0 Importance 14 4.5714 0.85163 0.048 - 0 Implementation - 3.8571 0.86444 - - 0 Distribution of product via authorized companies - 14 4.8571 0.36314 0.368 M 0.245	Importance	14	4.8571	0.36314	0.679	М	0.452
Separation storage area of quarantine and rejected material Importance 14 4.8571 0.36314 0.001 - 0 Implementation 4.7857 0.42582 - 0 Separation storage area of waste material according to SOP - 14 4.5714 0.85163 0.048 - 0 Implementation 14 4.5714 0.85163 0.048 - 0 Implementation 3.8571 0.86444 - 0 - 0 Distribution of product via authorized companies 14 4.8571 0.36314 0.368 M 0.245	Implementation		4.6429	0.49725			
Importance 14 4.8571 0.36314 0.001 - 0 Implementation 4.7857 0.42582 - 0 Separation storage area of waste material according to SOP - 4.7857 0.85163 0.048 - 0 Importance 14 4.5714 0.85163 0.048 - 0 Implementation 3.8571 0.86444 - 0 Distribution of product via authorized companies 14 4.8571 0.36314 0.368 M 0.245	Separation storage area of quarantine and rejected material						
Implementation 4.7857 0.42582 Separation storage area of waste material according to SOP - 0 Importance 14 4.5714 0.85163 0.048 - 0 Implementation 3.8571 0.86444 - 0 Distribution of product via authorized companies 14 4.8571 0.36314 0.368 M 0.245	Importance	14	4.8571	0.36314	0.001	-	0
Separation storage area of waste material according to SOPImportance144.57140.851630.048-0Implementation3.85710.86444-0Distribution of product via authorized companies144.85710.363140.368M0.245	Implementation		4.7857	0.42582			
Importance 14 4.5714 0.85163 0.048 - 0 Implementation 3.8571 0.86444 - 0 Distribution of product via authorized companies 14 4.8571 0.36314 0.368 M 0.245	Separation storage area of waste material according to SOP						
Implementation 3.8571 0.86444 Distribution of product via authorized companies Importance 14 4.8571 0.36314 0.368 M 0.245	Importance	14	4.5714	0.85163	0.048	_	0
Distribution of product via authorized companies Importance 14 4.8571 0.36314 0.368 M 0.245	Implementation		3,8571	0 86444			
Importance 14 4.8571 0.36314 0.368 M 0.245	Distribution of product via authorized companies						
IT T.07/1 0.001T 0.000 MI 0.243	Importance	14	4 8571	0 36314	0 368	М	0 245
- 2 3571 1 30268	Implementation	17	3 3571	1 30768	0.200	1/1	0.273

C: Critical non-conformity; M: Major non-conformity; N: Minor non-conformity; RPN: Risk priority number; NC: Non-conformity; QC: Quality control; QA: Quality assurance SOP: Standard operation procedure; ID: Identification; FEFO: First expired first out; FIFO: First in first out

In this study, we have demonstrated that the level of QA experts' knowledge in all categories is appropriate enough (more than 4 of 5), but some gaps between this level of knowledge and the level of implementation of QA indices was detected. The maximum gap has been observed the category of "measurement" in QA indices. This category includes self-inspection, validation, qualification, and analytical tests although the minimum gap has been detected in the category of "machinery" which contains: equipment and technology. Overall, we demonstrated some gaps between knowledge and implementation of QA indices which could divided into three general types of non-conformities: critical, major, and minor. The study has highlighted 28 cases of high risk non- conformities (28%) to the stated legalizations' within the Iranian pharmaceutical industry.

In our study, we have determined the risk priority number (RPN) of risks by failure mode and effect analysis (FMEA) method. In this method, we have calculated the RPN by multiplying the gap between importance and implementation of QA indices (occurrence) to type of non-conformity (severity). Occurrence is a number between zero to one and severity could be: zero (no non-conformity), 0.333 (minor non-conformity), 0.666 (major non-conformity), or one (critical non-conformity). Hence, the result (RPN), could be from zero (the least risk) to one (the highest risk). In this method, we have defined the value of 0.333 as the limits for initiation of measures.

Hence, in the category of "manpower," "physical examination before employment," "personnel clothing complying with GMP" has shown the highest risk.

Table 5. Average of knowledge and im	plementation and significance level of me	thod category indices: confidence interval $= 95\%$

Method category indices	Number of companies	Mean	Standard deviation	Significant	NC type	RPN
Change control management	i unio ei or companies		Standard de Hauton	Significant	ite type	
Importance	14	4 9286	0.26726	0.638	М	0.425
Implementation	11	3 2857	1 48989	0.050	101	0.125
Corrective and preventive actions (CAPA)		5.2057	1.40/07			
Importance	14	4 5714	0.85163	0.686	м	0.457
Implementation	14	4 0000	1 51911	0.000	141	0.457
Trend analysis and product quality review (POR)		4.0000	1.51911			
Importance	14	4 5714	0.64621	0.760	м	0 506
Importance	14	4.3714	1 51196	0.700	IVI	0.500
SOD for the sum and the sum		2.8371	1.31180			
SOP for documentation	14	4 0002	0.00267	0.054	м	0.025
Importance	14	4.9993	0.00267	0.054	IVI	0.035
Implementation		4.35/1	0.74495			
Just last version of documents should be accessible						
Importance	14	4.8571	0.36314	0.206	N	0.068
Implementation		4.3571	1.00821			
Archiving of quality documents in QA						
Importance	14	4.7143	0.61125	0.000	-	0
Implementation		4.0000	1.51911			
SOP for coding system and editing documents						
Importance	14	4.7857	0.57893	0.007	-	0
Implementation		4.7143	0.61125			
Stratifying of documents						
Importance	14	4.5714	1.34246	0.048	-	0
Implementation		4 2857	0.82542			
Appropriate interval between approving and implementing SOPs		1.2007	0.02312			
Importance	14	4 3571	1 33631	0.000	_	0
Implementation	11	3 7857	1 47693	0.000		0
Batch processing record (BDP)		5.7657	1.47075			
Importance	14	1 0003	0.00267	0.100	м	0.126
Implementation	14	4.9993	0.00207	0.190	IVI	0.120
SODe for headle sustemen compleint		4.0429	0.49723			
	14	1 9571	0.26214	1 000	м	0666
	14	4.6371	0.30314	1.000	IVI	0.000
		4.0000	1.338/3			
QA should be responsible for customer complaint	14	4.0571	0.26214	0.000	N	0.000
Importance	14	4.8571	0.36314	0.899	IN	0.299
Implementation		4.1429	1.61041			
Activation of recall system after critical defect						
Importance	14	4.9286	0.26726	1.000	С	1
Implementation		4.0000	1.17670			
Responsibility definition of contract giver and contract acceptor						
Importance	14	4.6429	0.63332	1.000	Ν	0.333
Implementation		4.0000	1.35873			
Permission of audit for contract giver						
Importance	14	4.2143	1.42389	0.016	-	0
Implementation		3.4286	1.69680			
Sufficient document to proof company ability to implement a						
contract						
Importance	14	4 4 2 8 6	0.93761	0 145	Ν	0.048
Implementation		2 9286	1 68543	011 10		0.0.0
SOP for production packaging and labeling processes		2.7200	1.00545			
Importance	14	17113	0.46881	0.002		0
Implementation	14	4.7143	0.40001	0.002	-	0
Implementation		4.3000	0.03044			
Prevention of cross-contamination and mix-up during processes	14	10296	0.26726	0.010		0
	14	4.9280	0.20720	0.019	-	0
Implementation		4.1429	0.53452			
Yield calculation for processes				.		
Importance	14	4.7143	0.46881	0.947	N	0.315
Implementation		3.7857	1.18831			
Time limitation for processes						
Importance	14	4.1429	1.51186	0.066	Ν	0.022
Implementation		2.9286	1.73046			
Prevention of gang-printing						
Importance	14	4.7857	0.57893	0.211	М	0.140
Implementation		4.4286	0.85163			

C: Critical non-conformity; M: Major non-conformity; N: Minor non-conformity; RPN: Risk priority number; NC: Non-conformity; SOP: Standard operation procedure

QA: Quality assurance

Table 6.	Average of knowl	edge and im	plementation and	significance le	evel of measurement	category indices	confidence interval = 95%

Table 6. Average of knowledge and implementation and significa	Number of measurement ca	Magory Indi	Standard deviation	= 95%	NC 4	DDM
Self immediate	Number of companies	Mean	Standard deviation	Significant	NC type	KPN
Self-inspection	14	4.0296	0.26726	0.420	м	0.20
	14	4.9280	0.20720	0.420	M	0.28
Implementation		3.9286	1.14114			
validation master plan (VMP)	14	4.0571	0.26214	0 457	NT	0.150
Importance	14	4.85/1	0.36314	0.457	N	0.152
Implementation		3.0714	1.81/20			
Revalidation						
Importance	14	4.8571	0.36314	0.938	Μ	0.625
Implementation		1.9286	1.32806			
Process validation						
Importance	14	4.8571	0.36314	0.808	Μ	0.538
Implementation		2.7143	1.26665			
Computer system validation						
Importance	14	4.2143	0.97496	0.760	М	0.506
Implementation		2.0000	1.75412			
Duration of cleaned equipment validity						
Importance	14	4.5714	0.51355	0.899	М	0.599
Implementation	11	2 7143	1 13873	0.077		0.077
Cleaning validation		2.7145	1.15075			
Importance	14	1 9571	0.26214	0.805	м	0.506
Implementation	14	2 1 4 2 0	1 56101	0.895	11/1	0.590
Alart and a stign limiter determination		2.1429	1.30191			
Alert and action limits determination	14	1 7057	0.42502	0.720		0.400
Importance	14	4.7857	0.42582	0.729	М	0.486
Implementation		1.6429	1.64584			
Supporting utilities validation						
Importance	14	4.8571	0.36314	0.122	М	0.081
Implementation		2.2143	1.18831			
Appropriate program for equipment calibration						
Importance	14	4.6429	0.49725	0.851	Μ	0.567
Implementation		2.9286	0.99725			
Design qualification						
Importance	14	4.6429	0 49725	0.611	М	0.407
Implementation		3,0000	1 03775	01011		01107
Installation qualification		5.0000	1.03773			
Importance	14	4 7143	0.46881	0.584	м	0 389
Implementation	14	2 0714	0.40881	0.564	11/1	0.369
		3.0714	0.75005			
	14	4 71 42	0.46991	0.464	м	0.200
Importance	14	4./143	0.46881	0.464	M	0.309
Implementation		2.85/1	1.09945			
Performance qualification						
Importance	14	4.9993	0.00267	0.455	М	0.303
Implementation		4.5714	0.75593			
Integrity test for HEPA filters during installation						
Importance	14	4.7857	0.42582	0.636	С	0.636
Implementation		4.0000	1.30089			
Integrity test for sterilized filters, before use and immediately						
after use						
Importance	14	4.4286	1.39859	0.017	-	0
Implementation		3 8571	1 83375			
Daily verification of balances		5.6571	1.05575			
Importance	14	4 8571	0.36314	0.138	N	0.046
Implementation	14	4.8571	0.36314	0.150	1	0.040
Analytical method validation		4.0371	0.30314			
Analytical method validation	14	4 71 42	0.46001	0.072	м	0.100
Importance	14	4./143	0.46881	0.273	M	0.182
Implementation		4.3571	0.74495			
Stability study for the first 3 batches						
Importance	13	4.9231	0.27735	0.387	Μ	0.258
Implementation		3.6154	1.85016			
Post marketing surveillance (PMS)						
Importance	11	4.9091	0.30151	0.753	Μ	0.502
Implementation		3.6364	1.96330			
Storage condition of samples and lab standards						
Importance	14	4.4286	1.34246	0.001	-	0
Implementation		4 0714	1 49174			
Testing method according to the marketing authorization license			1,1,1,1			
Importance	14	4 7143	0.82542	0.029		0
Implementation	14	3 8571	1.02711	0.02)		0
System anitability		5.6571	1.02711			
System suitability	14	1 < 100	0 (2222)	0.210	м	0.010
	14	4.0429	0.05332	0.319	IVI	0.212
Implementation		5.55/1	1.59842			
Documentation of lab data		4.055	0.0.001	0.020		0.255
Importance	14	4.8571	0.36314	0.838	N	0.279
Implementation		3.6429	1.00821			
Monitoring of pharmaceutical water						
Importance	14	4.7143	0.46881	0.273	С	0.273
Implementation		4.3571	0.74495			
Out of specification should be reported to QA						
Importance	14	4.5000	0.94054	0.004	-	0
Implementation		4 0000	1.03775			

 Implementation
 4.0000
 1.03775

 C: Critical non-conformity; M: Major non-conformity; N: Minor non-conformity; RPN: Risk priority number; NC: Non-conformity; QA: Quality assurance; HEPA: High efficiency particulate air



Figure 1. Quality causes and defects diagram

Furthermore, in the category of "Machinery", "Preventive maintenance" has shown the highest risk.

Also, in some issues detected high level of gaps between knowledge and implementation of QA indices. However, the level of importance in these issues may be various. Summary of the highest risks have been shown in figure 1.

The reason of this outcome might refer to this fact that Iranian pharmaceutical industry in last decades has been met the preliminary needs the community by quantity aspect. It brings companies to the next step which is quality phase. Companies are trying to renew old facilities by instructing GMP approved lines and modern machinery and equipment. In fact, very few companies are able to invest high cost for validations, qualifications, and other processes related to the measurement aspects.

Since the level of knowledge in QA managers is appropriate, poor performance could be caused by the absence of other staff of pharmaceutical company. We believe that another important reason for practice weakness is pricing system of Iran MOH, and emphasizing on keeping prices down which neglects investment of companies for quality issues. On the other hand, there is no enough pressure to pharmaceutical companies by Iran MOH for compliance with GMP principles.

4. Conclusion

The status of QA seniors' knowledge in Iranian pharmaceutical companies is in the appropriate level, but due to the absence of staff knowledge, economical situations and lack of a serious reaction from authority body (Iran MOH) to nonconformities of companies, the implementation of QA main indices is not appropriate.

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