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| QAR must be up-issued at RC and the expiry date shall be extended by exactly 36 months |
| Maximum two-month period prior to RC audit. Ideal audit date would be one-month prior to RC audit to allow time for N/C closing |
| True date 18 months before expiry for a surveillance audit on an 18-month cycle |
| Maximum two-month period prior to surveillance audit. Ideal audit date would be one-month prior to surveillance audit to allow time for N/C closing |
| Initial QAR issued with an expiry 36 months after the initial issue date, always extended by 36 months following an RC audit. |
| Maximum two-month period prior to IA or RC. Ideal audit date would be one-month prior to IA or RC to allow time for N/C closing |

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|  | 2-month period | 16-month period | 2-month period | 16-month period | 2-month period |
| QAR in compliance for first 18 months  |  |  |  |  |  |  |  |  |
| QAR in compliance for second 18 months |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| If audit done one month early for first 18 months |  |  |  |  |  |  |  |  |
| If audit done one month early for second 18 months |  |  |  |  |  |  |  |  |
| If RC audit done one month early |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| If audit done two months early for first 18 months |  |  |  |  |  |  |  |  |
| If audit done two months early for second 18 months |  |  |  |  |  |  |  |  |
| If RC audit done two months early |  |  |  |  |  |  |  |  |
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| Green is what we are trying to achieve, but that is an impossible requirement as that audit would have to be done and completed on the day the QAR was issued and exactly on 18 months thereafter.Blue color is achievable if we accept that a month early, plus or minus, is OK if it is repeated for every audit.Red is only acceptable if the ExCB accepts that it can never be more than two months early and this early audit is repeated at all future audits.**Important considerations:**Following satisfactory closing of any initial audit non-conformities the date of issue plus 36 months shall be the expiry date entered on the issue 0 QAR. Thence every three years thereafter the expiry date will shall be updated by 36 months, following a satisfactory recertification audit.Another important reason for this flexible approach that many companies have five or more manufacturing sites on a single QAR that need to be performed within a 4 to 6 week period in multiple countries. |

Key Audit dates are important, this document will use the following acronyms

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| Acronym | Description | Comments |
| IA | Initial Audit | The audit that creates the audit report for the issuance of a new QAR or an audit report used to add a new manufacturing site to an existing QAQR |
| P1 | First Periodic Surveillance audit | With audits every 18 months their will only be one Surveillance audit |
| P2 | Second Periodic Surveillance audit | This will only exist for surveillance audits every 12 months |
| RC | Recertification audit | Recertification audits start 3 years after initial QAR issue date and thence every 3 years thereafter |
| NC | Non-Conformity | RC Major NC’s must be closed prior to updating and up-issuing the QAR and issuing the Audit Report to the client. P1 or P2 Major NC’s must be closed prior to editing the current QAR to document the P1 or P2 audit and issuing the Audit Report.  |
|  |  |  |

No initial or up-issued QAR’s shall be issued until all major NC’s are closed.

The expiry date for a newly issued QAR shall be the same as the issue date of the new QAR plus 36 months.

This expiry date can only be changed via a mandatory recertification audit that occurs every three years.

Following a satisfactory recertification audit with major and no outstanding N/C