

FINAL  
DRAFT

INTERNATIONAL  
STANDARD

ISO/FDIS  
11737-3

ISO/TC 198

Secretariat: ANSI

Voting begins on:  
2023-02-15

Voting terminates on:  
2023-04-12

---

---

## Sterilization of health care products — Microbiological methods —

### Part 3: Bacterial endotoxin testing

*Stérilisation des dispositifs médicaux — Méthodes  
microbiologiques —*

*Partie 3: Essai des endotoxines bactériennes*

iTeh STANDARD PREVIEW  
(standards.iteh.ai)

[ISO/FDIS 11737-3](https://standards.iteh.ai/catalog/standards/sist/f12fc83b-8b34-461d-9dc0-dd10636a0293/iso-fdis-11737-3)

<https://standards.iteh.ai/catalog/standards/sist/f12fc83b-8b34-461d-9dc0-dd10636a0293/iso-fdis-11737-3>

RECIPIENTS OF THIS DRAFT ARE INVITED TO SUBMIT, WITH THEIR COMMENTS, NOTIFICATION OF ANY RELEVANT PATENT RIGHTS OF WHICH THEY ARE AWARE AND TO PROVIDE SUPPORTING DOCUMENTATION.

IN ADDITION TO THEIR EVALUATION AS BEING ACCEPTABLE FOR INDUSTRIAL, TECHNOLOGICAL, COMMERCIAL AND USER PURPOSES, DRAFT INTERNATIONAL STANDARDS MAY ON OCCASION HAVE TO BE CONSIDERED IN THE LIGHT OF THEIR POTENTIAL TO BECOME STANDARDS TO WHICH REFERENCE MAY BE MADE IN NATIONAL REGULATIONS.



Reference number  
ISO/FDIS 11737-3:2023(E)

© ISO 2023

iTeh STANDARD PREVIEW  
(standards.iteh.ai)

ISO/FDIS 11737-3

<https://standards.iteh.ai/catalog/standards/sist/f12fc83b-8b34-461d-9dc0-dd10636a0293/iso-fdis-11737-3>



**COPYRIGHT PROTECTED DOCUMENT**

© ISO 2023

All rights reserved. Unless otherwise specified, or required in the context of its implementation, no part of this publication may be reproduced or utilized otherwise in any form or by any means, electronic or mechanical, including photocopying, or posting on the internet or an intranet, without prior written permission. Permission can be requested from either ISO at the address below or ISO's member body in the country of the requester.

ISO copyright office  
CP 401 • Ch. de Blandonnet 8  
CH-1214 Vernier, Geneva  
Phone: +41 22 749 01 11  
Email: [copyright@iso.org](mailto:copyright@iso.org)  
Website: [www.iso.org](http://www.iso.org)

Published in Switzerland

# Contents

	Page
<b>Foreword</b> .....	<b>v</b>
<b>Introduction</b> .....	<b>vi</b>
<b>1 Scope</b> .....	<b>1</b>
1.1 Inclusions .....	1
1.2 Exclusions .....	1
<b>2 Normative references</b> .....	<b>1</b>
<b>3 Terms and definitions</b> .....	<b>1</b>
<b>4 General requirements</b> .....	<b>7</b>
<b>5 Selection of products</b> .....	<b>8</b>
5.1 General .....	8
5.2 Selection of product units .....	8
<b>6 Methods for BET</b> .....	<b>9</b>
6.1 General .....	9
6.2 Consideration of an applicable endotoxin limit .....	10
6.2.1 Endotoxin limit .....	10
6.2.2 Calculation of endotoxin limit for the extract solution .....	10
6.2.3 Maximum valid dilution (MVD) .....	10
6.3 Critical test parameters .....	11
6.3.1 Temperature .....	11
6.3.2 Time .....	11
6.3.3 pH .....	11
6.4 Equipment and materials .....	11
6.5 Reagents .....	12
<b>7 Method suitability for BET (BET validation)</b> .....	<b>12</b>
7.1 General .....	12
7.2 Product and test method suitability .....	12
7.2.1 Gel-clot technique .....	12
7.2.2 Kinetic and end point methods (chromogenic and turbidimetric techniques) .....	13
7.3 Sample preparation .....	14
7.3.1 General .....	14
7.3.2 Solid health care products .....	14
7.3.3 Aqueous health care products .....	15
7.3.4 Sample interference .....	15
7.4 Reagent and analyst qualification .....	15
7.4.1 Gel-clot technique reagent qualification .....	15
7.4.2 Kinetic and end point method reagent qualification .....	15
7.4.3 Analyst qualification .....	16
<b>8 Routine testing, monitoring and interpretation of data</b> .....	<b>16</b>
8.1 Routine testing .....	16
8.1.1 Gel-clot limit test .....	16
8.1.2 Gel-clot assay .....	16
8.1.3 Kinetic and end point methods (chromogenic and turbidimetric) .....	17
8.2 Monitoring (test frequency) .....	17
8.3 Interpretation of results .....	17
8.3.1 General .....	17
8.3.2 Gel clot methods .....	18
8.3.3 Kinetic and end point methods .....	18
8.4 Data analysis .....	18
8.5 Statistical methods .....	18
<b>9 Maintenance of the BET method</b> .....	<b>18</b>
9.1 General .....	18

9.2	Changes to either the product or manufacturing process, or both .....	18
9.3	Changes to the BET method.....	19
<b>10</b>	<b>Alternatives to batch testing.....</b>	<b>19</b>
10.1	General.....	19
10.2	Criteria for establishing alternatives to batch testing.....	19
10.3	Manufacturing process assessment.....	20
	10.3.1 Quality planning of manufacturing processes .....	20
	10.3.2 Process design.....	20
	10.3.3 Process control.....	20
10.4	Change control.....	21
10.5	Maintenance of risk assessment.....	21
<b>Annex A (informative) Guidance on bacterial endotoxin testing (following the subclauses in this document) .....</b>		<b>22</b>
<b>Annex B (informative) History and background on the bacterial endotoxins test (BET).....</b>		<b>42</b>
<b>Annex C (informative) Guidance on out of specified limits (OSL) and failure investigation .....</b>		<b>46</b>
<b>Annex D (informative) Guidance on in-process monitoring of manufacturing processes or component testing.....</b>		<b>50</b>
<b>Annex E (informative) Guidance on conducting a risk assessment to support alternatives to batch testing.....</b>		<b>53</b>
<b>Annex F (informative) Typical assignment of responsibilities.....</b>		<b>58</b>
<b>Bibliography.....</b>		<b>60</b>

iTeh STANDARD PREVIEW  
(standards.iteh.ai)

[ISO/FDIS 11737-3](https://standards.iteh.ai/catalog/standards/sist/f12fc83b-8b34-461d-9dc0-dd10636a0293/iso-fdis-11737-3)

<https://standards.iteh.ai/catalog/standards/sist/f12fc83b-8b34-461d-9dc0-dd10636a0293/iso-fdis-11737-3>

## Foreword

ISO (the International Organization for Standardization) is a worldwide federation of national standards bodies (ISO member bodies). The work of preparing International Standards is normally carried out through ISO technical committees. Each member body interested in a subject for which a technical committee has been established has the right to be represented on that committee. International organizations, governmental and non-governmental, in liaison with ISO, also take part in the work. ISO collaborates closely with the International Electrotechnical Commission (IEC) on all matters of electrotechnical standardization.

The procedures used to develop this document and those intended for its further maintenance are described in the ISO/IEC Directives, Part 1. In particular, the different approval criteria needed for the different types of ISO documents should be noted. This document was drafted in accordance with the editorial rules of the ISO/IEC Directives, Part 2 (see [www.iso.org/directives](http://www.iso.org/directives)).

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. ISO shall not be held responsible for identifying any or all such patent rights. Details of any patent rights identified during the development of the document will be in the Introduction and/or on the ISO list of patent declarations received (see [www.iso.org/patents](http://www.iso.org/patents)).

Any trade name used in this document is information given for the convenience of users and does not constitute an endorsement.

For an explanation of the voluntary nature of standards, the meaning of ISO specific terms and expressions related to conformity assessment, as well as information about ISO's adherence to the World Trade Organization (WTO) principles in the Technical Barriers to Trade (TBT), see [www.iso.org/iso/foreword.html](http://www.iso.org/iso/foreword.html).

This document was prepared by Technical Committee ISO/TC 198, *Sterilization of health care products*.

A list of all parts in the ISO 11737 series can be found on the ISO website.

Any feedback or questions on this document should be directed to the user's national standards body. A complete listing of these bodies can be found at [www.iso.org/members.html](http://www.iso.org/members.html).

## Introduction

A pyrogen is any substance that can induce fever. Testing for pyrogens is required for release of many health care products. Pyrogens can be classified into two groups: microbial (e.g. bacteria, fungi, viruses) and non-microbial (e.g. drugs, device materials, steroids, plasma fractions; see the ISO 10993 series). The predominant pyrogenic contaminants encountered in the manufacturing of health care products are bacterial endotoxins, which are components of the cell walls of Gram-negative bacteria. Although Gram-positive bacteria, fungi, and viruses can be pyrogenic, they do so through different mechanisms (systemic effects) and to a lesser degree than Gram-negative bacteria. Only the Gram-negative bacterial endotoxins test (BET) using amoebocyte lysate reagents from *Limulus polyphemus* or *Tachypleus tridentatus* is covered in this document. Other endotoxin detection methodologies, such as monocyte activation and recombinant Factor C (rFc), are not included (see [B.12](#)) in this document.

Endotoxins are the molecular weight lipopolysaccharide (LPS) components of the outer cell wall of Gram-negative bacteria, that can cause fever, meningitis, and a rapid fall in blood pressure if introduced into the blood stream or certain other tissues of the body. The outer cell wall components, which are composed primarily of proteins, phospholipids and LPS, are constantly released by the cell into the surrounding environment. Endotoxins are ubiquitous in nature, stable, and small enough to pass through conventional sterilizing filters. Sterilization processes will inactivate microorganisms on or in products, but usually do not inactivate endotoxin on products. With controlled processes, endotoxin contamination can be prevented.

The non-pyrogenicity of a health care product can be achieved through the following:

- a) manufacturing techniques that prevent or control endotoxin contamination (e.g. contamination with Gram-negative bacteria);
- b) depyrogenation by endotoxin inactivation (e.g. dry heat) or physical removal (e.g. rinsing, distillation, ultrafiltration).

The purpose of this document is to describe the requirements and guidance for testing for bacterial endotoxins. This includes product required to be non-pyrogenic based on either intended use or non-pyrogenic label claim, or both. Guidance is also provided on selection of product units, method suitability, use of techniques for routine testing, interpretation of test results, and alternatives to batch testing and risk assessment. Information on the following is provided in the annexes:

- guidance on bacterial endotoxin testing ([Annex A](#));
- the history and background on the BET ([Annex B](#));
- guidance on out of specified limits (OSL) and failure investigation ([Annex C](#));
- guidance on in-process monitoring of manufacturing or component testing ([Annex D](#));
- guidance on conducting a risk assessment to support alternatives to batch testing ([Annex E](#));
- typical assignment of responsibilities ([Annex F](#)).

This document is based on ANSI/AAMI ST72. Several sections in this document have been restructured and extended or changed from ANSI/AAMI ST72.

# Sterilization of health care products — Microbiological methods —

## Part 3: Bacterial endotoxin testing

### 1 Scope

#### 1.1 Inclusions

This document specifies general criteria to be applied in the determination of bacterial endotoxins on or in health care products, components or raw materials using bacterial endotoxins test (BET) methods, using amebocyte lysate reagents.

#### 1.2 Exclusions

**1.2.1** This document is not applicable to the evaluation of pyrogens other than bacterial endotoxins. Other endotoxin detection methodologies are not included (see [B.12](#)).

**1.2.2** This document does not address setting specific endotoxin limit specifications.

### 2 Normative references

There are no normative references in this document.

### 3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

ISO and IEC maintain terminology databases for use in standardization at the following addresses:

- ISO Online browsing platform: available at <https://www.iso.org/obp>
- IEC Electropedia: available at <https://www.electropedia.org/>

#### 3.1

##### **bacterial endotoxins test**

##### **BET**

assay for measuring bacterial endotoxins by combining an aqueous test sample or test sample extract with *Tachypleus* amebocyte lysate (*TAL*) ([3.41](#)) or *Limulus* amebocyte lysate (*LAL*) ([3.28](#)) reagent and measuring the resulting proportional reaction via visual, turbidimetric or *chromogenic techniques* ([3.3](#))

#### 3.2

##### **batch**

defined quantity of a product intended or purported to be uniform in character and quality produced during a specified cycle of manufacture

[SOURCE: ISO 11139:2018, 3.21]

**3.3  
chromogenic technique**

*bacterial endotoxins test (BET)* (3.1) methodology that quantifies endotoxins on the basis of a measured colour-producing reaction proportional to the interaction of *Limulus* ameobocyte lysate (*LAL*) (3.28) and endotoxin

**3.4  
control standard endotoxin  
CSE**

endotoxin standard preparation whose potency has been standardized against the *Reference Standard Endotoxin (RSE)* (3.37) for a specific batch of *Limulus* ameobocyte lysate (*LAL*) (3.28)

**3.5  
depyrogenation**

process used to remove or deactivate pyrogenic substances to a specified level

Note 1 to entry: Pyrogenic substances include bacterial endotoxins.

[SOURCE: ISO 11139:2018, 3.77]

**3.6  
direct contact**

medical device or medical device component that comes into physical contact with body tissue

[SOURCE: ISO 10993-1:2018, 3.6]

**3.7  
end product**

product samples that have completed the entire manufacturing process

Note 1 to entry: For the purposes of this document, end-product testing can be performed prior to sterilization (pre-sterilization samples) or after sterilization (post-sterilization samples). For limitations see 5.2.6.

**3.8  
endotoxin**

bacterial endotoxin

*lipopolysaccharide (LPS)*(3.29) component of the cell wall of Gram-negative bacteria that is heat stable and elicits a variety of inflammatory responses in animals and humans

[SOURCE: ISO 11139:2018, 3.101]

**3.9  
endotoxin limit**

maximum allowable amount of endotoxin present on the product or in a product extraction solution

**3.10  
endotoxin unit**

**EU**  
international unit  
**IU**  
standard unit of measure for endotoxin activity initially established relative to the activity contained in 0,2 ng of the *Reference Standard Endotoxin (RSE)* (3.37) Lot EC-2 [US Pharmacopeia (USP) standard reference material]

Note 1 to entry: Currently, the US RSE EC-6, USP Lot G, and the World Health Organization's primary international endotoxin standard (IS) are sub-lots of the same endotoxin preparation, making the EU and IU equal [45].



### 3.11 end point

most dilute concentration of a test or control solution for which a positive reaction for bacterial endotoxin is observed

Note 1 to entry: This definition is used for concentration dependent bacterial endotoxin testing, in contrast to dilution dependent end point methods described in [A.6.1.1](#).

### 3.12 enhancement

*bacterial endotoxins test (BET)* ([3.1](#)) anomaly in which a non-endotoxin related factor, usually attributable to a characteristic of the test sample, elicits a test reaction greater than the amount of endotoxin present

### 3.13 gel-clot technique

*bacterial endotoxins test (BET)* ([3.1](#)) methodology that quantifies or detects endotoxin on the basis of a clot-producing reaction proportional to the interaction of *Limulus* amoebocyte lysate (*LAL*) ([3.28](#)) and endotoxin

### 3.14 geometric mean end point

antilog of the average of the logarithmic values with respect to the *end points* ([3.11](#)) from replicate dilution series converted back to a base 10 number used to establish the central tendency or typical value from a test solution

### 3.15 health care product

medical device, including in vitro diagnostic medical device, or medicinal product, including biopharmaceutical

[SOURCE: ISO 11139:2018, 3.132]

### 3.16 indirect contact

medical device or medical device component through which a fluid or gas passes, prior to the fluid or gas coming into physical contact with body tissue (in this case the medical device or medical device component itself does not physically contact body tissue)

[SOURCE: ISO 10993-1:2018, 3.11]

### 3.17 inhibition

*bacterial endotoxins test (BET)* ([3.1](#)) anomaly in which a non-endotoxin related factor, usually attributable to a characteristic of the test sample, elicits a test reaction less than the amount of endotoxin present

### 3.18 method suitability

inhibition/enhancement test

test used to determine whether a particular sample contains interfering factors that diminish its accuracy by introducing *enhancement* ([3.12](#)) or *inhibition* ([3.17](#)) into the test system

### 3.19 interference

interfering factor observed in the performance of the test that exceeds the acceptable threshold for a given *bacterial endotoxins test (BET)* ([3.1](#)) technique (e.g. positive product control that indicates a detected endotoxin level less than 50 % or greater than 200 % or  $\pm 2$  lambda)

### 3.20 intraocular

located or occurring within or administered through the eye

**3.21**

**interfering factors**

non-endotoxin related factor, usually attributable to a characteristic of the test sample, that causes *inhibition* (3.17) or *enhancement* (3.12)

**3.22**

**intravascular**

located or occurring within or administered through the heart or blood vessels

**3.23**

**intralymphatic**

located or occurring within or administered through a lymph vessel

**3.24**

**intrathecal, adj,**

located, or occurring within or administered through the space under the arachnoid membrane of the brain or spinal cord

**3.25**

**kinetic method**

photometric quantitative techniques (turbidimetric or chromogenic) for *bacterial endotoxins test (BET)* (3.1)

**3.26**

**LAL reactive material**

**LAL-RM**

*Limulus* amoebocyte lysate reactive material

any non-endotoxin compound that will activate the *Limulus* amoebocyte lysate (LAL) (3.28) clotting cascade and cause *enhancement* (3.12)

**3.27**

**lambda**

$\lambda$

labelled sensitivity of a *Limulus* amoebocyte lysate (LAL) (3.28) gel-clot reagent, expressed in EU/mL or, for chromogenic or turbidimetric tests, the lowest point (endotoxin concentration) on the referenced standard curve

**3.28**

***Limulus* amoebocyte lysate**

**LAL**

reagent extracted from amoebocytes taken from hemolymph of the horseshoe crab, *Limulus polyphemus*, that reacts with endotoxin, to form a gelatinous clot and is used to estimate endotoxin levels in *bacterial endotoxins test (BET)* (3.1) methods

Note 1 to entry: The term LAL is sometimes used to describe *Tachypleus* amoebocyte lysate (TAL) (3.41), as both are similar lysates that are used in the BET. They also are often generically referred to as "lysate".

**3.29**

**lipopolysaccharide**

**LPS**

Gram-negative bacterial cell wall component composed of lipid A, a core polysaccharide, and an O-side chain

**3.30**

**maximum valid dilution**

**MVD**

maximum amount a sample can be diluted, or the total extraction volume used relative to the sensitivity of a *bacterial endotoxins test (BET)* (3.1) in which the specified *endotoxin limit* (3.9) can be detected

**3.31****medical device**

instrument, apparatus, implement, machine, appliance, implant, reagent for in vitro use, or software material or other similar or related article, intended by the manufacturer to be used, alone or in combination, for human beings, for one or more of the specific medical purpose(s) of:

- diagnosis, prevention, monitoring, treatment or alleviation of disease;
- diagnosis, monitoring, treatment, alleviation of or compensation for an injury;
- investigation, replacement, modification or support of the anatomy or of a physiological process;
- supporting or sustaining life;
- control of conception;
- disinfection of medical devices;
- providing information by means of in vitro examination of specimens derived from the human body;

and does not achieve its primary intended action by pharmacological, immunological or metabolic means, but which may be assisted in its intended function by such means

Note 1 to entry: Products which can be considered to be medical devices in some jurisdictions, but not in others include:

- items specifically intended for cleaning or sterilization of medical devices;
- pouches, reel goods, sterilization wrap, and reusable containers for packaging of medical devices for sterilization;
- disinfection substances;
- aids for persons with disabilities;
- devices incorporating either animal or human tissues, or both;
- devices for in vitro fertilization or assisted reproduction technologies.

[SOURCE: ISO 13485:2016, 3.11, modified — The first two list items in the Note 1 to entry have been added. In Note 1 to entry, "may be considered" has been changed to "can be considered" to indicate possibility rather than permission.]

**3.32****non-pyrogenic**

not inducing a fever

Note 1 to entry: Describes an item or product that contains endotoxin levels that conform to specified limits.

**3.33****out of specified limits****OSL**

sample with a valid *bacterial endotoxins test (BET)* (3.1) result that exceeds a product *endotoxin limit* (3.9) specification

Note 1 to entry: The term OSL applies only within the context of this document and does not imply compliance with any other regulatory guidance dealing with out of specification (OOS) results.

**3.34****product positive control****PPC**

sample spiked with a known amount of endotoxin used for confirmation that the product being tested is not subject to *interfering factors* (3.21)

**3.35**

**pyrogen**

substance that induces a fever

**3.36**

**pyrogenic**

inducing a fever

Note 1 to entry: Describes an item or product that contains endotoxin levels above specified limits.

**3.37**

**Reference Standard Endotoxin**

**RSE**

US Pharmacopeia (USP) endotoxin reference standard that has a defined potency of 10,000 USP EUs per vial

**3.38**

**repeat test**

analysis of additional product samples from a previously tested batch or another batch

**3.39**

**retest**

reanalysis of previously tested product samples or product sample preparation

**3.40**

**standard control series**

serial dilution series of *Reference Standard Endotoxin (RSE)* (3.37) or *control standard endotoxin (CSE)* (3.4) used to verify *Limulus* amebocyte lysate (*LAL*) (3.28) sensitivity

**3.41**

***Tachypleus* amebocyte lysate**

**TAL**

reagent extracted from amebocytes taken from hemolymph of the horseshoe crab, *Tachypleus tridentatus*, which reacts with endotoxin, to form a gelatinous clot and is used to estimate endotoxin levels in *bacterial endotoxins test (BET)* (3.1) methods

Note 1 to entry: The term TAL is sometimes used to describe *Limulus* amebocyte lysate (*LAL*) (3.28), as both are similar lysates that are used in the BET. They also are often generically referred to as "lysate".

**3.42**

**turbidimetric technique**

*bacterial endotoxins test (BET)* (3.1) methodology that quantifies or detects endotoxin on the basis of a measured turbidity reaction proportional to the interaction of *Limulus* amebocyte lysate (*LAL*) (3.28) and endotoxin

**3.43**

**validation**

confirmation, through the provision of objective evidence, that the requirements for a specific intended use or application have been fulfilled

Note 1 to entry: The objective evidence needed for a validation is the result of a test or other form of determination such as performing alternative calculations or reviewing documents.

Note 2 to entry: The word "validated" is used to designate the corresponding status.

Note 3 to entry: The use conditions for validation can be real or simulated.

[SOURCE: ISO 9000:2015, 3.813]

### 3.44 verification

confirmation, through the provision of objective evidence, that specified requirements have been fulfilled

Note 1 to entry: The objective evidence needed for a verification can be the result of an inspection or of other forms of determination such as performing alternative calculations or reviewing documents.

Note 2 to entry: The word “verified” is used to designate the corresponding status.

[SOURCE: ISO 9000:2015, 3.8.12, modified — The original Note 2 to entry has been deleted and Note 3 has been renumbered as Note 2 to entry.]

### 3.45 water for bacterial endotoxins test WBET

purified water employable as a solvent, diluent, and/or extractant that is non-reactive with the lysate employed at the detection limit of the reagent, and does not elicit *interference* (3.19) with methodology in use [typically *Limulus* amoebocyte lysate (*LAL*) (3.28) reagent water, water for injection, or other appropriate solution meeting these requirements]

## 4 General requirements

**4.1** The development, validation and routine control of products with acceptable endotoxin levels are critical elements in the realization of some types of health care products. To ensure the consistent implementation of the requirements specified in this document, the necessary processes shall be established, implemented and maintained. Processes of particular importance in relation to the development, validation and routine endotoxin control of a process include but are not limited to:

- control of documentation, including records,
- assignment of management responsibility,
- provision of adequate resources, including competent human resources and infrastructure,
- control of product provided by external parties,
- identification and traceability of product throughout the process, and
- control of non-conforming product.

**NOTE** ISO 13485 covers all stages of the life cycle of medical devices in the context of quality management systems for regulatory purposes. National and/or regional regulatory requirements for the provision of health care product can require the implementation of a full quality management system and the assessment of that system by a recognized conformity assessment body.

**4.2** A process shall be specified for the calibration of all equipment, including instrumentation for test purposes, used in meeting the requirements of this document.

## 5 Selection of products

### 5.1 General

**5.1.1** The types of products required or labelled to be non-pyrogenic and the associated bacterial endotoxin limits shall be determined and be consistent with the intended clinical application.

Products should not be labelled as 'pyrogen free' because complete freedom from bacterial endotoxins cannot be demonstrated by testing due to the detection limits inherent in current test methods. The term 'non-pyrogenic' should be used.

NOTE 1 See [A.5.1.1](#) and [Annex B](#) for risks associated with endotoxins and for commonly used limits.

NOTE 2 National regulatory requirements can apply regarding non-pyrogenic labelling.

**5.1.2** For some products, higher endotoxin limits can be justifiable, with additional supporting data depending on the risk/benefit of the device. Likewise, for other products, more stringent limits can be required (e.g. devices with intrathecal contact).

**5.1.3** Product required or labelled to be non-pyrogenic shall require explicit substantiation employing a suitable BET method. Such substantiation shall include at least one of the following:

- end-product testing for each batch;
- alternative-to-batch testing (see [Clause 10](#) and [Annex E](#)).

**5.1.4** All parts of products required or labelled to be non-pyrogenic shall be included in the testing process. The exclusion of any part of the product shall be justified and documented (e.g. a handle or a power cord).

**5.1.5** There are health care products that have portions of the product that are sealed and as such do not come into contact with the patient. Such portions of the product that do not have patient contact are not required or intended to be non-pyrogenic, and may be excluded from endotoxin testing.

**5.1.6** For products for which a claim of non-pyrogenicity applies only to a portion of the product (e.g. the fluid path in an administration set for intravenous infusion), endotoxin testing does not apply to the portions of product not intended to be non-pyrogenic. A statement about the portion of the product to which the claim applies (such as 'non-pyrogenic fluid path') shall be supported by appropriate evaluation of components and surfaces relevant to that portion of the product.

**5.1.7** For multi-component kit products for which a claim of either non-pyrogenicity or label claim, or both, applies to only a portion of the kit, endotoxin testing does not apply to the portions of the kit not intended to be non-pyrogenic. The non-pyrogenic portions of the kit shall be supported by appropriate documented rationale.

### 5.2 Selection of product units

**5.2.1** The sampling criteria for selection of product units for endotoxin testing are based on the premise that the manufacturing process, as well as the processes identified in [4.1](#), are controlled (refer to [A.2](#)).

NOTE See [Annex D](#) for guidance on in-process monitoring of manufacturing processes or component testing.

**5.2.2** The selection of product units for testing shall be based on criteria defined in a sampling plan that includes an assessment of components and processing. This rationale should consider the following:

- a) applicable regulatory requirements;
- b) assessment of risk;
- c) historical performance;
- d) manufacturing process validation;
- e) statistical considerations.

**5.2.3** There are two types of sampling plans: batch testing and alternatives to batch testing.

**5.2.3.1** For batch testing, non-pyrogenicity is confirmed through the use of end-product testing. The batch may be defined as each production lot or a product intended or purported to be uniform in character and quality produced during a specified cycle of manufacture. This should be supported with documented rationale or risk assessment (refer to [A.5.2](#) for guidance on the number of samples).

**5.2.3.2** Alternatives to batch testing may be used if it has been demonstrated that the manufacturing process and materials are suitably controlled. If alternatives to batch testing are performed, a risk assessment to evaluate the criteria used to establish the sampling plan shall be performed (see [Clause 10](#) and [Annex E](#)).

**5.2.4** Samples selected for testing shall include all factors that can affect or contribute to the levels of endotoxin.

**5.2.5** Samples used for endotoxin testing can be selected from routine production, products that have been rejected for other production quality issues that have no effect on endotoxin content, or surrogate samples that are representative of the full manufacturing process and representative of product endotoxin levels.

**5.2.6** Samples may be obtained prior to sterilization (pre-sterilization) or after sterilization (post-sterilization). Post-sterilization samples encompass all the factors that can affect the product or the endotoxin test. When pre-sterilization samples are selected for testing, the acceptability of the samples in representing the endotoxin level on sterilized product shall be justified and documented. The program for ongoing testing should consistently reflect either pre- or post-sterilization samples. Guidance is provided in [A.5.2.6](#) for assessing the acceptability of pre-sterilization testing.

NOTE For products that support microbial growth, see [A.5.2.6](#).

**5.2.7** In the testing of multi-component kits (procedure packs) or sets of individual products within the same sterile barrier system, depending upon how the product is used, there are instances where each component may be evaluated individually and other instances where the entire contents may be considered as a single entity. Consideration of a set or a kit as a single unit shall address sample preparation in adherence to method requirements and the applicable endotoxin limit. The total volume of extraction fluid used for the subcomponents should not exceed the maximum extraction volume determined by the MVD.

## 6 Methods for BET

### 6.1 General

**6.1.1** There are currently three commonly accepted BET techniques. The choice of technique should be based upon an assessment of the laboratory's capability, experience, sample throughput