Standard Operating Procedure

SOP Title: Record Retention Policy
Document Code: SOP-VA-108
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Approved By: [Name / Title]
Review Date: [Annually or as needed]

1. Purpose

To define minimum retention periods and storage requirements for all cGMP and CCA-related records generated at Verano Virginia.

2. Scope

Applies to physical and electronic records produced across production, QA, laboratory, distribution, and compliance activities.

3. Responsibilities

Role	Key Responsibilities
QA Document Control	Maintains Master Retention Schedule; audits record storage compliance.
Department Managers	Ensure records are filed in approved locations and retained per schedule.
IT / Facilities	Provide secure electronic backups and climate-controlled physical storage.

4. Retention Schedule

Record Type	Retention	Reference
Master Batch Record & all attachments	**3 years**	21 CFR 211.180(a); CCA Rules
COAs (lab reports)	3 years	same

Record Type	Retention	Reference
Deviations & CAPAs	5 years	ICH Q10 §3.2
Recall Files	5 years from closure	SOP-VA-107
Training Records	Duration of employment + 1 year	21 CFR 211.25
Equipment Calibration / Maintenance	Life of equipment + 3 years	21 CFR 211.182
Environmental Monitoring & Cleaning Logs	3 years	cGMP Guidance
Audit Reports & Plans	5 years	SOP-VA-105
Supplier Qualifications	Active supplier term + 3 years	FDA QSR

(If state law or contracts require longer retention, follow the longer period.)

5. Storage & Access

- **Electronic records** stored on secure QA server with automatic nightly backup and restricted access rights.

- **Physical records** kept in locked, fire-rated cabinets in the QA archive room (temperature ≤ 25 °C, RH < 60 %).

- Scanned PDFs are acceptable provided originals are archived for at least one audit cycle.

6. Disposition Procedure

1. QA Document Control issues a monthly “Records Due for Destruction” report.

2. Department Manager reviews list; removes any records subject to holds (e.g., open CAPA, litigation).

3. Records approved for destruction are shredded (paper) or securely deleted (electronic).

6. References

- 21 CFR 211.180 – General Recordkeeping

- 21 CFR 211.182 – Equipment Cleaning & Use Logs

- ICH Q10 §3.2 – Documentation

- Virginia CCA Regulations – Document maintenance

- ISO 9001:2023 Clause 7.5 – Documented Information

- SOP-VA-101 Document Control SOP

- SOP-VA-107 Product Recall SOP

- QM-VA-001 Quality Manual

7. Revision History

Version	Date	Change Description	Approved By
		Aligned with updated Quality Manual QM-VA-001 and Master Batch Record SOP.	[Name / Title]