23 May 2014

Submission of comments on:

Volume 4 EU guidelines for Good Manufacturing Practice for Medicinal Products for Human and Veterinary Use, Annex 15: Qualification and Validation,
Document released for consultation on 6 February 2014 by the European Commission

Comments from:

Name of organisation or individual
STALLERGENES 6 rue Alexis de Tocqueville 92183 Antony Cedex

Specific comments on text

Section of the draft for which a comment is made	Comment	Proposed changes
1.3 Validation personnel should report as defined in the pharmaceutical quality system although this may not necessarily be to a quality management or a quality assurance function, however there should be appropriate oversight over the whole validation life cycle.	A clarification that validation is part of the QMS but does not necessarily report to the QA function would be useful.	1.3 Validation personnel should be an integral and well defined part of the pharmaceutical Quality Management System (QMS), however, this may not necessarily be included into a quality management structure or be a quality assurance function. There should be appropriate oversight over the whole validation life cycle by the quality assurance function.
2.7 Results which fail to meet the pre-defined acceptance criteria should be recorded as a **deviation**, be fully investigated and any implications for the validation discussed in the report.	Is "deviation" the appropriate term since at this stage all specification might not be established?	
9.3 It is recognised that a cleaning validation programme may take some time to complete and validation with ongoing verification after each batch may be required. The level of data from the verification to support a conclusion that the equipment is clean should be evaluated.	Does this mean that product marketing may be initiated before the validation is completed provided that the level of data resulting from ongoing cleaning verification supports a conclusion that the equipment is clean?	

9.5 Limits for the carry over of product residues should be based on a toxicological evaluation to determine the product specific permitted daily exposure (PDE) value. The justification for the selected PDE value should be documented in a risk assessment which includes all the supporting references. The removal of any cleaning agents used should also be confirmed.	It is also necessary to consider alternative approach for the toxicological evaluation of certain specific product categories, such as allergen products. On this product, see comments made on the draft of the "guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities" (EMA/CHMP/CVMP/SWP/169430/2012)	9.5 Limits for the carry over of product residues should be based on a toxicological evaluation to determine the product specific permitted daily exposure (PDE) value or any justified maximum allowable limit based on a risk assessment report when a PDE cannot be calculated as per ICH Q3C. This concerns specific product categories such as allergen products. The justification for the selected PDE value should be documented in a risk assessment which includes all the supporting references. The removal of any cleaning agents used should also be confirmed.