<2nd of July 2013>

Submission of comments on:
Revised Chapter 6 of European GMP guide on Quality Control

Comments from:

Name of organisation or individual
EFPIA

Please note that these comments and the identity of the sender will be published unless a specific justified objection is received.

When completed, this form should be sent to the European Medicines Agency electronically, in Word format (not PDF).

1. General comments

Stakeholder number *(To be completed by the Agency)*	General comment (if any)	Outcome (if applicable) *(To be completed by the Agency)*
	The changes in the Chapter 6 are welcomed in principle including clarification on the activities relating to technical transfer of analytical methods.	
	EFPIA would like to comment on two points of principle relating to IMP's and labelling and also proposes a number of clarification point and other suggestions.	
	Labelling Where reference is made to labelling of containers, samples, and reagents, appropriately validated electronic systems (eg bar codes) may be used in place of manual processes providing that the relevant criteria specified in the appropriate section are met. This could be stated under the "General Section" of the chapter.	
	IMP's Although the Guidelines apply in principle to Investigational Medicinal Products (IMPs), there should be clarity that for development activities, different approaches can be chosen, if justified. This could be stated at the beginning of the Chapter.	

2. Specific comments on text

Line number(s) of the relevant text *(e.g. Lines 20-23)*	**Stakeholder number** *(To be completed by the Agency)*	**Comment and rationale; proposed changes** *(If changes to the wording are suggested, they should be highlighted using 'track changes')*	**Outcome** *(To be completed by the Agency)*
Section 6.7		Comment: We believe that mentioning "anomalous results" in the third bullet point is superfluous. We propose to delete it, as reference to OOS and OOT is sufficient. Proposed change (if any): • a procedure for the investigation of Out Of Specification and Out Of Trend results;	

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6.9		Comment: We suggest adding the text from EU-GMP Part II chapter 8.36. This is regarded helpful specially when implementing continuous process verification (PAT, inline measurements etc.) Proposed change (if any): Some kinds of data (e.g. tests results, yields, environmental controls) should be recorded in a manner permitting trend evaluation. Any out of trend or out of specification data should be addressed and subject to investigation. Out of specification investigations may not normally be required for in-process tests that are performed for the purpose of monitoring and/or adjusting the process as permitted by the marketing authorisation or the Technical Dossier.	
6.12		Comment: Regarding samples it might be considered appropriate to reference to the regulatory dossier Proposed change (if any): **Beside those samples described in the registration filing** other samples may also be taken to monitor the most stressed part of a process.	

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6.15 and 6.37		Comment: It is recommended there is further clarification by what is meant by "Technical dossier" We assume that this is the CTD. Proposed change (if any): Clarification added, potentially in the General Section or at the first case of reference in the Chapter.	
6.22		Comment: It is good practice to consider an expiry date for even stable reagents, so the word unstable should be removed. We also recommend adding the word "any" for clarification. Proposed change (if any): The expiry date of reagents and culture media should be indicated on the label, together with any specific storage conditions. In addition, for volumetric solutions, the last date of standardisation and the last current factor should be indicated.	

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6.25		The wording should be clarified to ensure that it refers to used media and strains. In addition the handling of used media and strains should be added. Proposed change (if any): Used microbiological media and strains should be handled, decontaminated and disposed of in a manner to prevent the cross-contamination and retention of residues.	
Section 6.28		Comment: We believe that the sentence seems over complex which may lead to confusion due to interpretation differences. We suggest the use of bullet points for example Proposed change (if any): The on-going stability programme mainly applies to the medicinal product in the package in which it is sold, but consideration should also be given to the inclusion in the programme of other product scenarios. For example • the impact on stability of the storage and/or shipment of bulk product prior to packaging • the impact on stability of the storage and/or shipment of intermediates that are stored and used over prolonged periods • Stability studies on reconstituted finished product are performed during product development need not be monitored on an on-going basis. However, when relevant, the stability of reconstituted product can also be monitored.	

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6.37		Comment: It should be clarified that is only for validation of test methods related to Marketing Authorisations that it is a requirement to be in accordance with ICH requirements. Proposed change (if any): "Prior to transferring a test method, the transferring site should verify that the test method(s) comply with those as described in the Marketing Authorisation or the relevant technical dossier. For methods which are part of the Marketing Authorisation the original validation of the test method(s) should be reviewed {DELETE: to ensure compliance with current ICH/VICH requirements}. A gap analysis {ADD: with current ICH/VICH requirements} should be performed and documented to identify any supplementary validation that should be performed, prior to commencing the technical transfer process."	

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6.38		Comment: Guideline should include a statement describing the approaches that can be taken for the transfer of a test method (for example as described in USP <1224> Transfer of Analytical Procedures) Proposed change (if any): The transfer of test methodology from one laboratory (transferring laboratory) to another laboratory (receiving laboratory) can be accomplished by different approaches. The methodology used should be described in a written protocol.	

Please add more rows if needed.