# January 2019 PDA Letter

Parenteral Packaging conference



This year's *Parenteral Packaging conference* is scheduled for March 19–20 in Venice, Italy. Articles with this banner at the top of the page relate to this important meeting.



#### Regulatory Concerns Drive New Developments in Glass Packaging Rebecca Stauffer, PDA

Find out what some of the speakers and program planning committee members behind the upcoming PDA *Parenteral Packaging* conference think is spurring development of new types of glass packaging.

Cover Art Illustrated by Katja Yount

### An Overview of Container Closure Integrity

Considerations for Achieving an Optimal Performance Window for Container Closure Systems

Qingyu Zeng, PhD, West Pharmaceutical Services, Inc.

A typical container closure system has three major components: a rubber stopper, vial and aluminum seal. In order to satisfy mandatory patient safety requirements, container closure integrity must be ensured through a holistic consideration of many critical aspects.

#### ılı. InfoGraphic



# United States and Europe Align on Glass

Find out how the U.S. Pharmacopeia has aligned with the European Pharmacopoeia around glass packaging.



www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

Sr. VP, Education

#### PDA LETTER STAFF EXECUTIVE STAFF

Senior Director of Publishing **Richard Johnson** Walter Morris President & CEO (301) 656-5900, ext. 148 David Talmage morris@pda.org

Managing Editor Rebecca Stauffer stauffer@pda.org

> Graphic Designer Katia Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE Marcia Baroni Eli Lilly & Company Joanne Beck Celgene

STERIS

Michael De Felippis, PhD Eli Lilly

> Mirko Gabriele Patheon

Stephanie Gaulding DPS Engineering

Richard Hameister Coherus Biosciences

Brian Hawkins, PhD **BioLife Solutions** 

Tamer Helmy, PhD Microbial Vigilance

Zena Kaufman ZGK Quality Consulting

Gwendolvn Lohr Novo Nordisk

Frank Matos

SOFIE Aaron Mertens

STERIS

Ajay Pazhayattil Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

Cecilia Turoff

Wendy Zwolenski Lambert Novartis Kelly Waldron

ValSource

Vice President, Sales Anil Sawant, PhD (301) 656-5900 ext. 160 Melissa Seymour hall@pda.org Biogen

Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP. Finance Debbie Goldstein VP, Marketing David Hall VP. Sales Falk Klar, PhD VP. PDA Europe Molly Moir VP, Programs & Meetings Trevor Swan Walid El Azab Director, Membership & Chapters PDA BOARD OF DIRECTORS OFFICERS Chair | Rebecca Devine, PhD Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski Baxter Healthcare Secretary | Steven Lynn Lvnn Consulting Imm. Past Chair | Martin VanTrieste DIRECTORS Masahiro Akimoto Otsuka Pharmaceutical Factory, Inc. Barbara M. Allen, PhD

> Joyce Bloomfield Bettine Boltres, PhD West

Pfizer

Pfizer Merck Stephan Krause, PhD AstraZeneca Biologics

Emma Ramnarine ADVERTISING SALES Genentech/Roche

David Hall Merck & Co./Merck Sharp & Dohme

Eli Lilly **Michael Blackton** Adaptimmune Veronique Davoust Ghada Haddad

Mary Oates Pfizer

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

### Departments

#### News & Notes

- 8 2019 PDA Board of Directors
- Comment on PIC/S DI Guidance via PDA g

#### People

- Volunteer Spotlight | Friedrich von Wintzingerode 10
- Chapter Update | India Chapter Gets Hands-On with CCI Tech 12
- Photostream | PDA/FDA Joint Regulatory Conference; 13th Annual PDA Global Confer-14 ence on Pharmaceutical Microbiology

#### Science

- 18 Science Snapshot | Co-Authors Team Up for Book Signing at PDA Micro; Journal TOC: Latest Research on Extraction/Leaching, Split-Cakes and More in Jan/Feb PDA Journal
- 19 Current Perspectives on the Monocyte Activation Test
- 22 Are You (And Pharma) Ready for the Future?

#### Regulatory

- Regulatory Snapshot | IG Corner: Quality Metrics Still a Point of Discussion between 39 Industry, U.S. FDA
- Innovative Tech Drives Drug Shortage Solutions 41

#### Voices of PDA

- President's Message | PDA Adapts to Changing Future 44
- Voices of the Board | Embracing the Future of Cell and Gene Therapies 46

#### **Digital Exclusives**

- On the Issue | Big Data 오
- Roche's Aaron Goerke talks about what big data means for pharma manufacturing.
- Holistic Verification Requires a New Mindset CSL Behring's David Hubmayr explains why holistic verification is key to manufacturing drug products in an increasingly patient-centric world.
- Amsterdam Move Reflects Larger Trend EMA is not the only thing moving to Amsterdam!

#### pda.org/letter

#### PDA GLOBAL HEADQUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### **PDA TRAINING & RESEARCH** INSTITUTE





20

28

Discover the latest advancements in parenteral manufacturing at the 2019 PDA Annual Meeting by reading through our special Annual Meeting supplement!

# PUPSIT & the Proposed Annex 1 Revision

Hal Baseman, ValSource

Since its publication in December 2017, the proposed Annex 1 revision has been much discussed. As coleader of the team that prepared PDA's comments on the revision, I am intimately familiar with the intricacies of the document. As such, I want to share some thoughts on the revision, culminating in four pieces of advice concerning one of the most debated points of contention within Annex 1.

Cover Art Illustrated by Katja Yount

#### III. InfoGraphic



The *PDA Letter* conducted an informal survey last year to ascertain how prepared PDA members are for the proposed Annex 1 revision.





www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF **Richard Johnson**

Senior Director of Publishing Walter Morris President & CEO (301) 656-5900, ext. 148 David Talmage morris@pda.org

> **Managing Editor** Rebecca Stauffer stauffer@pda.org

Graphic Designer Katja Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE

> Marcia Baroni Eli Lilly & Company

> > Joanne Beck Celaene

Walid El Azab STERIS

Michael De Felippis, PhD Eli Lilly

Mirko Gabriele

Patheon Stephanie Gaulding DPS Engineering

**Richard Hameister** Coherus Biosciences

Tamer Helmy, PhD Lynn Consulting

Microbial Vigilance Zena Kaufman

ZGK Quality Consulting

Gwendolyn Lohr Novo Nordisk

Frank Matos SOFIE

Aaron Mertens STERIS

Ajay Pazhayattil Eurofins

Andivanto Sutandar, PhD HGP Asia Pte. Ltd.

Cecilia Turoff Pfizer

Wendy Zwolenski Lambert Novartis

> Kelly Waldron ValSource

ADVERTISING SALES Vice President, Sales David Hall

hall@pda.org

Sr. VP, Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP. Finance Debbie Goldstein VP, Marketing David Hall VP, Sales Falk Klar, PhD VP, PDA Europe Molly Moir VP, Programs & Meetings Trevor Swan

Director, Membership & Chapters

#### PDA BOARD OF DIRECTORS

OFFICERS Chair | Rebecca Devine, PhD Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski Brian Hawkins, PhD Baxter Healthcare

BioLife Solutions Secretary | Steven Lynn

Imm. Past Chair | Martin VanTrieste Civica Rx

DIRECTORS

Masahiro Akimoto Otsuka Pharmaceutical Factory, Inc. Barbara M. Allen, PhD Eli Lilly Michael Blackton Adaptimmune Jovce Bloomfield

Bettine Boltres, PhD West

Veronique Davoust Pfizer Ghada Haddad

Merck Stephan Krause, PhD

AstraZeneca Biologics Mary Oates

Emma Ramnarine Genentech/Roche Anil Sawant, PhD

(301) 656-5900 ext. 160 Merck & Co./Merck Sharp & Dohme Melissa Seymour Biogen

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

8 Visit the Redesigned PDA Website

#### People

- 10 Volunteer Spotlight | Christine Bui
- 12 Chapter Update | Chapter Meeting Validates Data Integrity as Key Issue
- Photostream | Project Management in the Pharmaceutical Industry; PDA Visitors 14

#### Science

- 16 Science Snapshot | Interest Group Corner: Lifecyle Management a Key Topic for Vaccines Interest Group at 2018 PDA/FDA JRC
- 17 Response to "Standing Guard"
- Take C&GT Supply Challenges by the Horn 19

#### Regulatory

- 31 **Global Regulators Partner for Greater Patient Access**
- Thanks for the Warning Letter: Part II 34

#### Voices of PDA

38 Voices of the Board | Chapters: Another Way to Connect

#### **Digital Exclusives**

- Alternative to LAL Gains Ground As alternatives to the traditional LAL assay enter the market, what does this mean for the industry?
- Growth Promotion Testing for EM Why are reference materials critical for environmental monitoring?

#### pda.org/letter

#### PDA GLOBAL HEADQUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### **PDA TRAINING & RESEARCH** INSTITUTE

# March 2019 PDA Letter

### **Industry Eyes Future of Visual Inspection**

Five Critical Areas of Concern Draw Attention of Pharma Industry John Shabushnig, PhD, Insight Pharma Consulting; Markus Lankers, PhD, MIBIC; John Ayres, MD, Pharma Safety Solutions; Roy Cherris, Bridge Associates; Robert Miller, Pfizer; Romain Veillon, GSK Vaccines; and Rick Watson, Merck

It goes without saying that visual inspection is critical to parenteral manufacturing. All units produced must be inspected to ensure a high level of quality assurance. Visual inspection can be performed with the human eye by a trained inspector under controlled conditions or via automation using advanced camera and computer technology.

Cover photo courtesy of Antares Vision. This photo depicts the company's Visual Rotating Inspector machine

# 228

# The Challenges of Visually Inspecting IV Bags

Is there a common technical standard for automated visual inspection in difficult-to-inspect parenteral products? Talk with any quality manager or project engineer in the pharma manufacturing sector and they will tell you that there are a number of processes where inspection results often do not meet the expectations. As long as there is no independent standard defining the quality of automated visual inspection, however, inspection results can vary significantly case by case. This is a particular concern for IV bags.

#### III. InfoGraphic



# Can We Achieve "O" Defects for Visible Particles?

Find out what can be done to accomplish this challenging goal in the latest *PDA Letter* InfoGraphic!

### Big Data is Here to Stay

2018 PDA Manufacturing Intelligence Workshop Commands a Crowd

Aaron Goerke, PhD, F. Hoffmann-La Roche AG, and Michele D'Alessandro, Merck & Company, Inc.

Implementing big data within pharmaceutical manufacturing will require extensive collaboration. Fortunately, a 2018 PDA workshop suggests this is possible.





www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF Senior Director of Publishing Walter Morris

(301) 656-5900, ext. 148 morris@pda.org

**Managing Editor** Rebecca Stauffer stauffer@pda.org

Graphic Designer Katja Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE

Marcia Baroni Eli Lilly & Company

> Joanne Beck Celaene

Walid El Azab STERIS

Mirko Gabriele Patheon

Stephanie Gaulding DPS Engineering Richard Hameister **Coherus Biosciences** 

Brian Hawkins, PhD Pluristyx Inc.

Tamer Helmy, PhD Baxter Healthcare

Alcon

Zena Kaufman ZGK Quality Consulting

Gwendolvn Lohr Novo Nordisk

Frank Matos

SOFIE

Aaron Mertens STERIS

Ajay Pazhayattil Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

Cecilia Turoff

Pfizer Wendy Zwolenski Lambert

Novartis Kelly Waldron

ValSource

ADVERTISING SALES Vice President, Sales

David Hall (301) 656-5900 ext. 160 Emma Ramnarine

**Richard Johnson** President & CEO David Talmage VP, Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP, Finance Debbie Goldstein

VP, Marketing David Hall VP, Sales

Falk Klar, PhD VP, PDA Europe Molly Moir

VP, Programs & Meetings Trevor Swan

Director, Membership & Chapters

PDA BOARD OF DIRECTORS

OFFICERS Chair | Rebecca Devine, PhD Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski

Secretary | Steven Lynn Lynn Consulting

Imm. Past Chair | Martin VanTrieste Civica Rx

DIRECTORS Masahiro Akimoto

Otsuka Pharmaceutical Factory, Inc. Barbara M. Allen, PhD

Eli Lilly Michael Blackton

Adaptimmune Jovce Bloomfield

Bettine Boltres, PhD West

Veronique Davoust Pfizer

Ghada Haddad Merck

Stephan Krause, PhD AstraZeneca Biologics

Mary Oates Pfizer hall@pda.org Genentech/Roche Anil Sawant, PhD

Merck & Co./Merck Sharp & Dohme Melissa Seymour Bioaen

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

- 8 PDA Welcomes Ruth Miller
- 9 Board of Directors Nominations Needed
- 9 PDA Opens Asia Pacific HQ

#### People

- 10 Volunteer Spotlight | Kim Sobien
- Chapter Update | Student Chapter Gains Stem Cell Insights 12

#### Science

- 14 Science Snapshot New Datwyler Site Showcases Flexible Manufacturing; Journal TOC: Read the Latest Aseptic Processing Research in the March/April PDA Journal
- Technology Column | Viruses on the Surface 16
- **Biopharma Offers New Opportunities** 18
- 19 Can the Power of Viruses be Harnessed for Good?

#### Regulatory

- 39 PDA Comments | Eyeing Visual Inspection of Visible Particles
- Vaccines, Biosimilars Share Commonalities 41
- 42 Implementation Proves Parametric Release Possible

#### Voices of PDA

46 Voices of the Board | Another Year of Reg Collaboration

#### Digital Exclusives

- On the Issue | P. Acnes in an Aerobic Process 🖻
- Merck's Kenneth Boone covers recovery of anaerobic microorganisms from an aerobic aseptic process simulation.
- Change is in the Air for Packaging Components West's Cathy Zhao offers her perspective on the latest packaging trends.

pda.org/letter

#### PDA GLOBAL HEADQUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### **PDA TRAINING & RESEARCH** INSTITUTE

# April 2019 PDA Letter



#### The Pharmacopeia in the 21<sup>st</sup> Century Pharmacopeias Move to Modernize in Changing Times

Susanne Keitel, EDQM

Maintaining a comfortable state of health has always been a major human preoccupation. By the dawn of the first millennium, this was manifested in *De Materia Medica*, generally considered to be the earliest example of a pharmacopoeia. This treatise compiled contemporary tried and tested herbal and other remedies, methods for their preparation and their effects on patients. Fast forward two thousand years and the world has changed entirely and, with it, attitudes about health and well-being.

Cover Art Illustrated by Katja Yount



### Future Lies in Continuous Manufacturing Technology

What do the Global Regulators and Pharmacopeias Have to Say? Bei Ma, Pinea Group

In recent years, the pharmaceutical manufacturing leaders have been exploring innovative and new technical solutions to achieve better quality, improve productivity and operational efficiency, increase process throughput and yields.

Advancements in technologies such as, digitalization, artificial intelligence and machine learning, 3D printing, precision medicine, automation, augmented and virtual reality, will shape the pharmaceutical industry over the next five to ten years.

### **Growth Promotion Testing For EM**

Reference Materials Critical for Ensuring Effective Environmental Monitoring Tests Brendan Tindall, biomerieux, and Graham Vesey, Regeneus

Growth promotion testing of culture media is an important part of microbiological testing in support of pharmaceutical quality. The growth promotion test is a quality control requirement that confirms the ability of a new batch of media to support growth of a predetermined selection of representative microorganisms.



#### III. InfoGraphic



# **Avoid These 5 SOP Pitfalls**

Learn what mistakes to avoid in order to ensure an effective SOP for your GMP operations.



www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF Senior Director of Publishing Walter Morris

(301) 656-5900, ext. 148 morris@pda.org

> **Managing Editor** Rebecca Stauffer stauffer@pda.org

Graphic Designer Katja Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE

Marcia Baroni Eli Lilly & Company

Celaene

STERIS

Mirko Gabriele Patheon

Stephanie Gaulding DPS Engineering Richard Hameister **Coherus Biosciences** 

Brian Hawkins, PhD Pluristyx Inc.

Alcon

Zena Kaufman

ZGK Quality Consulting Gwendolvn Lohr

Novo Nordisk

Frank Matos SOFIE

Aaron Mertens STERIS

Ajay Pazhayattil Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

Cecilia Turoff

Pfizer

Wendy Zwolenski Lambert Novartis

> Kelly Waldron ValSource

ADVERTISING SALES

Vice President, Sales David Hall (301) 656-5900 ext. 160 Emma Ramnarine

**Richard Johnson** President & CEO David Talmage Sr. VP, Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP, Finance

Debbie Goldstein VP, Marketing David Hall VP, Sales Falk Klar, PhD

VP, PDA Europe Joanne Beck Molly Moir

VP, Programs & Meetings Walid El Azab Trevor Swan

Director, Membership & Chapters

PDA BOARD OF DIRECTORS

OFFICERS

Chair | Rebecca Devine, PhD Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski Tamer Helmy, PhD Baxter Healthcare Secretary | Steven Lynn Lynn Consulting

> Imm. Past Chair | Martin VanTrieste Civica Rx

DIRECTORS Masahiro Akimoto Otsuka Pharmaceutical Factory, Inc.

Barbara M. Allen, PhD Eli Lilly

Michael Blackton Adaptimmune Jovce Bloomfield

Bettine Boltres, PhD West

Veronique Davoust Pfizer

Ghada Haddad Merck

Stephan Krause, PhD AstraZeneca Biologics

Mary Oates Pfizer

hall@pda.org Genentech/Roche Anil Sawant, PhD Merck & Co./Merck Sharp & Dohme Melissa Seymour Bioaen

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

- 8 Jack Cole, In Memoriam
- 9 The 2018 PDA Letter Article of the Year

#### People

- Volunteer Spotlight | Andiyanto Sutandar
- 12 Chapter Update | NE Election Results Revealed at Cold Storage Event
- 15 Tools for Success | 4 Simple Strategies for Overcoming Stress
- Photostream | PUPSIT Testing; Cryopreservation Standard Task Force 16

#### Science

- Science Snapshot | PDA Addresses LER in TR, Forthcoming Book; 18 Journal Top 10: Particulate Papers Dominate PDA Journal Views for February
- **Technology** | B. cepacia: What is it and Why is it a Concern? 19

#### Regulatory

- Regulatory Snapshot | Quality Systems Interest Group Expands Activities 37
- PDA Comments | Clarity Needed on CMC Guidance for C> 38 Proposed Change for RCR Language
- Data Integrity Journey Has Only Just Begun 40
- Deep Dive into Biosimilars Continues 43

#### Voices of PDA

46 Voices of the Board | Advancing Cell and Gene Therapies

#### Digital Exclusives

> Industry and Regulators Convene to Address Vaccines Challenges Read a summary of last year's Vaccines conference in this longform article!

#### pda.org/letter

#### PDA GLOBAL HEADQUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

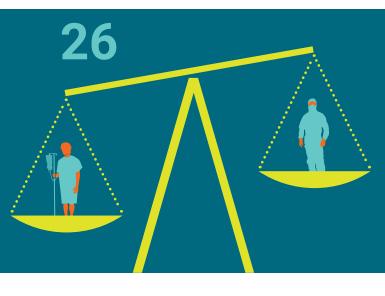
#### **PDA TRAINING & RESEARCH** INSTITUTE

4350 East West Hwy., Suite 150 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (240) 482-1659 info-tri@pda.org

# 10



What does the future hold for parenteral manufacturing in Europe? Find out by reading through our special section highlighting the 4<sup>th</sup> PDA Europe Annual Meeting!



### Highly Potent APIs Balancing Patient and Operator Safety

**Rebecca Stauffer, PDA** 

When contamination control comes up as a topic of discussion at a PDA conference the conversation usually concerns how to protect product from potential contamination. But what about the operator?

Cover Art Illustrated by Katja Yount

InfoGraphic



#### **Technology Transfer** Failure to Communicate?

Earlier this year, PDA conducted a survey on tech transfer. The results were showcased at the 2019 PDA Annual Meeting. Check out some highlights from the survey.



www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF

Senior Director of Publishing Walter Morris (301) 656-5900, ext. 148 morris@pda.org

> **Managing Editor** Rebecca Stauffer stauffer@pda.org

Graphic Designer Katja Yount yount@pda.org

PDA LETTER EDITORIAL

COMMITTEE Marcia Baroni

Eli Lilly & Company Joanne Beck

Celaene Walid El Azab

STERIS Mirko Gabriele

Patheon

Stephanie Gaulding DPS Engineering Richard Hameister **Coherus Biosciences** 

Brian Hawkins, PhD Pluristyx Inc.

Tamer Helmy, PhD Baxter Healthcare Alcon

Zena Kaufman

ZGK Quality Consulting Gwendolvn Lohr

Novo Nordisk

Frank Matos SOFIE

Aaron Mertens STERIS

Ajay Pazhayattil Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

Cecilia Turoff

Pfizer Wendy Zwolenski Lambert

ValSource

Novartis Kelly Waldron

ADVERTISING SALES Vice President, Sales David Hall (301) 656-5900 ext. 160 Emma Ramnarine

**Richard Johnson** President & CEO David Talmage Sr. VP, Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP, Finance Debbie Goldstein VP, Marketing David Hall VP, Sales Falk Klar, PhD VP, PDA Europe

VP, Programs & Meetings Trevor Swan Director, Membership & Chapters

Molly Moir

PDA BOARD OF DIRECTORS

#### OFFICERS

Chair | Rebecca Devine, PhD Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski

Secretary | Steven Lynn Lynn Consulting

Imm. Past Chair | Martin VanTrieste Civica Rx

#### DIRECTORS

Masahiro Akimoto Otsuka Pharmaceutical Factory, Inc. Barbara M. Allen, PhD

Eli Lilly Michael Blackton

Adaptimmune Jovce Bloomfield Bettine Boltres, PhD

West Veronique Davoust

Pfizer Ghada Haddad

Merck Stephan Krause, PhD

#### AstraZeneca Biologics

Mary Oates Lachman Consultant Services, Inc. hall@pda.org Genentech/Roche Anil Sawant, PhD Merck & Co./Merck Sharp & Dohme

Melissa Seymour Bioaen

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

8 2019 PDA Honor Awards

#### People

- 10 Volunteer Spotlight | Dawn Downey, PhD
- Chapter Update | Building an Efficient QRM Strategy 12
- Photostream | PDA PQS for PACs Quality Leaders 14
- Eye on Education | PDA Expands Course Offerings in India 17

#### Science

- 18 Science Snapshot | Journal TOC: Upcoming PDA Journal Includes Technology Article on Surface Steam Sterilization Process
- 20 A Patient's Life Depends on Product Quality

#### Regulatory

- 34 PDA Comments | Drug Storage Regulations in Plain Language
- **Reclaim Efficiency Amid Serialization Nightmares** 35

#### Voices of PDA

38 Voices of the Board | Collaboration Makes Things Easier!

#### Digital Exclusives

- On the Issue | Controlling Contamination and Cross-Contamination 🖻 SKAN's Richard Denk discusses EU requirements to prevent cross-contamination at the 2019 PDA Annual Meeting
- On the Issue | Implementing a Completely Closed, Robotic Isolator for Flexible Filling 오 Emergent's Kevin Gadient provides insights on implementation of a gloveless, robotic isolator
- Air Bubbles versus Transparent Particles Find out how to differentiate between the two during automated visual inspection

pda.org/letter

#### PDA GLOBAL HEADQUARTERS

#### 4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### **PDA TRAINING & RESEARCH** INSTITUTE

# **PDA** Letter June 2019

# **Gloveless Isolators Offer** Speedy Throughput Jim Akers, PhD, Akers Kennedy and Associates

If the reader thought this was going to be another commentary on the impact of humans on contamination and the elimination of direct interventions, they are going to be surprised. Automated, gloveless aseptic technologies are a logical progression as our field moves into the 21<sup>st</sup> century.

Cover Photo by Zora Zhuang



### **Aseptic Technology** Advances to the Next Level A Review of Four Technologies Used to Reduce

**Operator Interventions in Aseptic Manufacturing** 

Subrata Chakraborty, Cipla

The pharmaceutical industry has never been a rapid pioneer in adopting new technologies, preferring instead to evolve slowly and consciously.

III. InfoGraphic

26



# **Isolators Trending for Manufacturers**

Check out results from PDA's 2017 aseptic processing survey specific to isolators.



www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF Senior Director of Publishing Walter Morris

(301) 656-5900, ext. 148 morris@pda.org

**Managing Editor** Rebecca Stauffer stauffer@pda.org

Graphic Designer Katja Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE

> Marcia Baroni Eli Lilly & Company

> > Joanne Beck Celaene

Walid El Azab STERIS

Patheon

Stephanie Gaulding Pharmatech Associates Brian Hawkins, PhD

Alcon Zena Kaufman

Novo Nordisk

Frank Matos

Aaron Mertens STERIS

Ajay Pazhayattil Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

Wendy Zwolenski Lambert Novartis

Kelly Waldron

Vice President, Sales David Hall

**Richard Johnson** President & CEO David Talmage Sr. VP, Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP. Finance Debbie Goldstein VP, Marketing David Hall VP, Sales

Molly Moir

Trevor Swan

Mirko Gabriele

Richard Hameister Coherus Biosciences

Pluristyx Inc.

Tamer Helmy, PhD Baxter Healthcare

ZGK Quality Consulting

Gwendolyn Lohr

SOFIE

Cecilia Turoff Pfizer

Pfizer

ValSource

ADVERTISING SALES

(301) 656-5900 ext. 160 Emma Ramnarine

Falk Klar, PhD VP, PDA Europe VP, Programs & Meetings Director, Membership & Chapters PDA BOARD OF DIRECTORS OFFICERS Chair | Rebecca Devine, PhD Regulatory Consultant Chair-Elect | Jette Christensen, PhD

Novo Nordisk Treasurer | Michael Sadowski Secretary | Steven Lynn Lynn Consulting

Imm. Past Chair | Martin VanTrieste Civica Rx

DIRECTORS Masahiro Akimoto

Otsuka Pharmaceutical Factory, Inc. Barbara M. Allen, PhD Eli Lilly

Michael Blackton Adaptimmune Jovce Bloomfield

Bettine Boltres, PhD West

Veronique Davoust

- Ghada Haddad Merck
- Stephan Krause, PhD AstraZeneca Biologics

Mary Oates Lachman Consultant Services, Inc.

hall@pda.org Genentech/Roche Anil Sawant, PhD Merck & Co./Merck Sharp & Dohme Melissa Seymour

Bioaen

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

- 8 Share Your History with PDA
- 9 5 PDA Leaders Recognized by Trade Publication
- 9 Talk Highlights Personal Impact of Cell Therapies

#### People

- Volunteer Spotlight | Brian J. Hawkins 10
- Chapter Update | Cell and Gene Manufacturing Grows in Singapore 12
- Photostream | 2019 PDA Annual Meeting; 2019 PDA Visual Inspection Forum 14

#### Science

- Science Snapshot | Interest Group Corner: Manufacturing Plants Must Transform 18 Aging Facilities to Alleviate Drug Shortage Concerns Journal Top 10: Check Out the Latest Research on Continuous EM in the PDA Journal!
- 19 Technology | New ISO Standard Available for Water Systems
- **Rapid Micro Methods Carry Potential** 23

#### Regulatory

- Comments | Ph. Eur. Tackles Endotoxin Alternative rFC 36
- U.S. FDA Rep Offers Overview on Visible Particulates 39
- 42 The Role of Project Managers in Pharma

#### Voices of PDA

46 Voices of the Board | PDA Leading Future of Biopharma

#### Digital Exclusives

On the Issue | USP <1207> and the Future of CCI Testing 오 Diane Paskiet of West Pharmaceutical Services discusses the impact of <1207> on container closure integrity testing.

pda.ora/letter

#### PDA GLOBAL HEADQUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### **PDA TRAINING & RESEARCH** INSTITUTE



PDA/FDA Joint Regulatory Conference



Learn what to expect at the 2019 PDA/FDA Joint Regulatory Conference in our special section.

# DATA INTEGRITY

U.S. FDA Continues Data Integrity Focus A Review of U.S. Regulations on

cGMP and Data Integrity

The U. S. FDA continues to inspect pharmaceutical facilities for compliance with its cGMP regulations, and as a result of these inspections, has issued numerous warning letters citing several significant violations of cGMP regulations involving data integrity.

#### Follow the Audit Trail Breadcrumbs Audit Trail Reviews Crucial for

Maintaining Data Integrity Ann Milliman, Baxter Healthcare Corporation

Data integrity is a hot topic for the U.S. FDA and other global regulatory agencies. Two crucial aspects, in particular, have been cited by regulators: audit trails and audit trail reviews.

# New Technology Meets Old

Data Integrity Challenges Kir Henrici, The Henrici Group, Monica

Kir Henrici, The Henrici Group, Monica Cahilly, Green Mountain Quality Assurance, and Peter Baker, Green Mountain Quality Assurance

The ecosystem of life science data has experienced a seismic shift. Industry 4.0, the Internet of Things and next generation intelligence have enabled unprecedented capabilities in using data to support product development, process excellence, compliance and innovation. We are now in a new era suffused with promise for health and well-being.

#### III. InfoGraphic

# HIRA ANVISA FDA EMA PHDA

# PAC iAM<sup>s™</sup> MAN

Handling post-approval changes (PAC) can feel like an unending game of varying regulatory requirements. But following the ICH quality guidelines and ensuring robust quality systems can help achieve PAC goals.



www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF Senior Director of Publishing **Richard Johnson** Walter Morris

(301) 656-5900, ext. 148 morris@pda.org

**Managing Editor** Rebecca Stauffer stauffer@pda.org

Graphic Designer Katja Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE

> Marcia Baroni Eli Lilly & Company

Joanne Beck Celaene

Walid El Azab STERIS

Mirko Gabriele Patheon

Stephanie Gaulding Pharmatech Associates Coherus Biosciences Brian Hawkins, PhD

Pluristyx Inc.

Gwendolvn Lohr Novo Nordisk

Frank Matos

SOFIE Aaron Mertens

STERIS

Ajay Pazhayattil Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

> Cecilia Turoff Pfizer

Wendy Zwolenski Lambert Novartis

> Kelly Waldron ValSource

#### ADVERTISING SALES

Vice President, Sales David Hall (301) 656-5900 ext. 160 Emma Ramnarine

President & CEO David Talmage VP, Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP, Finance Debbie Goldstein VP, Marketing David Hall VP, Sales Falk Klar, PhD VP, PDA Europe Molly Moir VP, Programs & Meetings Trevor Swan Director, Membership & Chapters PDA BOARD OF DIRECTORS OFFICERS Chair | Rebecca Devine, PhD Richard Hameister Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski Tamer Helmy, PhD Baxter Healthcare Alcon Secretary | Steven Lynn Zena Kaufman Lynn Consulting

ZGK Quality Consulting Imm. Past Chair | Martin VanTrieste Civica Rx

> DIRECTORS Masahiro Akimoto Otsuka Pharmaceutical Factory, Inc.

Barbara M. Allen, PhD Eli Lilly Michael Blackton

Adaptimmune Jovce Bloomfield Bettine Boltres, PhD

West Veronique Davoust Pfizer

Ghada Haddad Merck

Stephan Krause, PhD AstraZeneca Bioloaics

Mary Oates Lachman Consultant Services, Inc. hall@pda.org Genentech/Roche

Anil Sawant, PhD Merck & Co./Merck Sharp & Dohme Melissa Seymour Bioaen

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

- 8 PDA In the News
- g PDA TRI Wall Acknowledges Suppliers' Support

#### People

- 10 Volunteer Spotlight | Laurie Masiello
- Chapter Update | More than Volcanoes or Solar System Models 12
- 13 Chapter Update | Chapter Offers Coffee with PDA President
- 14 Photostream | 2019 PDA Cell and Gene Therapy Conference; Capital Area Chapter Meet & Greet Networking Event
- 15 Eye on Education | PDA Aseptic Processing Course Instructors Go Global

#### Science

#### 16 Summer Reading

- Science Snapshot | Journal TOC: Study Looks at Endotoxin Testing for Snake Bite 22 Antivenoms Produced Using Horse Plasma
- 23 Future of Packaging on Display at Stevanato Tour
- Air Bubbles versus Transparent Particles 24

#### Regulatory

- 43 Comments | Full Support for WHO WFI Guidance
- A Weeklong Look at Quality Risk Management 44
- 47 Foreign Particles in Bull's Eye of Global Reg Agencies
- Holistic Verification Requires a New Mindset 48

#### Voices of PDA

50 Voices of the Board | Common Goals Make Everyone Stronger

#### Digital Exclusives

- On the Issue | Here They Come: Pharma Young Professionals 오 West Pharma's **Amy Kim** and Biogen's **Maria Bednar** discuss their Young Professionals presentations at the 2019 PDA Annual Meeting.
- Excipients' Attributes Crucial for Parenteral Preparations Learn why quality attributes are important for the excipients used in our industry.
- SoCal Student Chapter Keeps Busy Find out what the PDA Southern California's student chapter has been up to!

#### pda.org/letter

#### PDA GLOBAL HEADQUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### **PDA TRAINING & RESEARCH** INSTITUTE





### Lifecycle Approach Wipes Away Cleaning Validation Concerns Raji Vathyam

Cleaning validation is a perpetual undertaking for multiproduct drug manufacturing companies, particularly those with dynamic product profiles and frequently changing commercial needs. With rising demands for complex molecules or highly potent drugs, manufacturers now must continuously invest in new technologies such as containment systems, which offer protection to both operators and finished products.

Cover Photo by Katja Yount

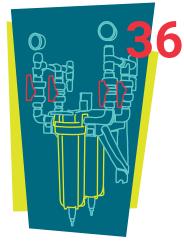


### Human Error Causes OOS Investigation

One Company's Experience with Determining Root Cause for an Endotoxin Testing Failure Rebecca Stauffer and Madeline Cusick, PDA

Testing failures are not unheard of in the industry. Routine samples that normally pass specification can, out of the blue, suddenly fail.

#### III. InfoGraphic



# Endotoxin Control in Another Industry

Find Out How an Operating Room Improved Their Endotoxin Control

Endotoxin control is a major concern for pharmaceutical microbiologists. Did you know it is also an issue in operating theaters? A ten-year study of endotoxin-retentive ultrafilters used for reverse osmosis (RO) plants in an operating theater was highlighted last year in the *PDA Journal of Pharmaceutical Science and Technology.* 



www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF Senior Director of Publishing **Richard Johnson** Walter Morris

(301) 656-5900, ext. 148 morris@pda.org

**Managing Editor** Rebecca Stauffer stauffer@pda.org

Graphic Designer Katja Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE

> Marcia Baroni Eli Lilly & Company

Joanne Beck Celaene

Walid El Azab STERIS

Mirko Gabriele Patheon

Stephanie Gaulding Pharmatech Associates Coherus Biosciences Brian Hawkins, PhD Pluristyx Inc.

Tamer Helmy, PhD Baxter Healthcare Alcon

Zena Kaufman ZGK Quality Consulting

Gwendolvn Lohr

Novo Nordisk Frank Matos

SOFIE

Aaron Mertens STERIS

Ajay Pazhayattil Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

> Cecilia Turoff Pfizer

Wendy Zwolenski Lambert Novartis

> Kelly Waldron ValSource

#### ADVERTISING SALES

Vice President, Sales David Hall (301) 656-5900 ext. 160 Emma Ramnarine

President & CEO David Talmage Sr. VP. Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP, Finance Debbie Goldstein VP, Marketing David Hall VP, Sales Falk Klar, PhD VP, PDA Europe Molly Moir VP, Programs & Meetings Trevor Swan Director, Membership & Chapters

PDA BOARD OF DIRECTORS

OFFICERS Chair | Rebecca Devine, PhD

Richard Hameister Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski

> Secretary | Steven Lynn Lynn Consulting

Imm. Past Chair | Martin VanTrieste Civica Rx

DIRECTORS Masahiro Akimoto

Otsuka Pharmaceutical Factory, Inc. Barbara M. Allen, PhD

Eli Lilly Michael Blackton

Adaptimmune Jovce Bloomfield Bettine Boltres, PhD

West Veronique Davoust Pfizer

Ghada Haddad Merck

- Stephan Krause, PhD AstraZeneca Biologics

Mary Oates Lachman Consultant Services, Inc. hall@pda.org Genentech/Roche Anil Sawant, PhD Merck & Co./Merck Sharp & Dohme

Melissa Seymour Bioaen

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

- 8 Help Shape the Future of Your Association
- PDA Remembers Edmund "Ed" Fitzgerald 9

#### People

- 10 Volunteer Spotlight | Kir Henrici
- Chapter Update | Ireland Chapter Addresses Annex 1 Revision 12
- Volunteer Opportunities Abound! 15
- Eye on Education | Students Enthused About PDA Courses in India 17
- 18 Photostream | 4th PDA Europe Annual Meeting

#### Science

20 Science Snapshot | In Print: Validation Requirements for Cleaning and Sanitization Practices

Journal Preview: More on Low Endotoxin Recovery in the September/October PDA Journal!

- 22 ISO 22519: A Flawed and Counterproductive Standard
- 26 Ready for the Pharma of Tomorrow?

#### Regulatory

- PDA Comments | Concerns About USP <1235> Revision 39
- Why is the EU Medical Device Regulation So Critical? 41
- 43 Supporting the Quality Risk Management Framework
- 44 Regulators, Compendia Eye Components

#### Voices of PDA

#### 46 Voices of the Board | Your Local Connection to PDA

#### Digital Exclusives

- On the Issue | Here They Come: Pharma Young Professionals 오 West Pharma's Amy Kim and Biogen's Maria Bednar discuss their Young Professionals presentations at the 2019 PDA Annual Meeting.
- Another Perspective on rFC Lonza's Allen Burgenson comments on recent coverage of alternative endotoxin testing technologies.
- SE Chapter Helps Students Build Bridge to Future Learn more about the new student chapter affiliated with the Southeast Chapter!

#### pda.org/letter

#### PDA GLOBAL HEADOUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### **PDA TRAINING & RESEARCH** INSTITUTE

# October 2019 PDA Letter

# Can We Reprogram the Human Computer?

#### **CEO Jeff Galvin Believes We Can**

Rebecca Stauffer, PDA

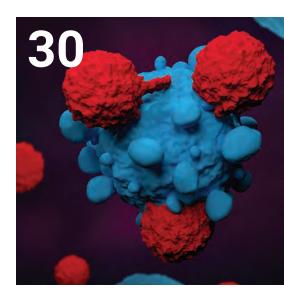
What if developers of cell and gene therapies treated their products like software releases? What if the human body could be manipulated like a highly complex computer?

**Jeff Galvin,** CEO of American Gene Technologies, certainly has that mindset, frequently referring to cell and gene therapies as "reprogramming the human computer."

# Conference Puts Human Face on Cell and Gene Therapies

Rebecca Stauffer, PDA

Cell and gene therapies will unquestionably comprise a large part of biotech companies' portfolios in the upcoming decades. Unlike traditional large molecules, these products have different manufacturing and supply chain needs, requiring a fresh look at existing regulations. Yet these challenges will need to be addressed due to the promise of these products to cure a variety of diseases and disorders.



Kevin Allen Photography

#### III. InfoGraphic



# **Process Approach Goes Global**

Earlier this year, the European arm of PDA's Quality Systems Interest Group surveyed members of its process owner subgroup about how they have implemented the process approach at their companies.



www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available.

Articles in the PDA Letter may be reproduced with permission contact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF Senior Director of Publishing Walter Morris President & CFO

(301) 656-5900, ext. 148 morris@pda.org

Managing Editor Rebecca Stauffer stauffer@pda.org

**Graphic Designer** Katja Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE

Marcia Baroni Eli Lilly & Company Joanne Beck

Celgene

Walid El Azab STERIS

Mirko Gabriele Patheon

Stephanie Gaulding Pharmatech Associates Richard Hameister Coherus Biosciences Brian Hawkins, PhD Pluristyx Inc.

Tamer Helmy, PhD Baxter Healthcare

Zena Kaufman

ZGK Quality Consulting Gwendolyn Lohr

Novo Nordisk

Frank Matos SOFIE

Aaron Mertens STERIS

Ajay Pazhayattil Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

Cecilia Turoff

Pfizer Wendy Zwolenski Lambert Novartis

Kelly Waldron ValSource

ADVERTISING SALES

Vice President, Sales

David Hall Lachman Consulta (301) 656-5900 ext. 160 Emma Ramnarine hall@pda.org Genentech/Roche

President & CEO David Talmage Sr. VP, Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP, Finance Debbie Goldstein VP, Marketing

AL David Hall 'EE VP, Sales oni Falk Klar, PhD my VP, PDA Europe eck Molly Moir VP, Programs & Meetings tab Trevor Swan

Director, Membership & Chapters

PDA BOARD OF DIRECTORS

OFFICERS Chair | Rebecca Devine, PhD

Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski Baxter Healthcare Secretary | Steven Lynn Lynn Consulting

Imm. Past Chair | Martin VanTrieste Civica Rx

DIRECTORS

Masahiro Akimoto Otsuka Pharmaceutical Factory, Inc. Barbara M. Allen, PhD

Eli Lilly Michael Blackton

Adaptimmune Joyce Bloomfield Bettine Boltres, PhD

West Veronique Davoust Pfizer

Ghada Haddad *Merck* 

\_\_\_\_\_ Stephan Krause, PhD \_\_\_\_\_ *AstraZeneca Biologics* 

ales Mary Oates Hall Lachman Consultant Services, Inc.

- Emma Ramnarine
  Genentech/Roche
  Anil Sawant, PhD
  Merck & Co./Merck Sharp & Dohme
  - Melissa Seymour *Biogen*

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

- 8 First PDA Standard Out for Public Comment
- 9 PDA Launches Quality Culture Website

#### People

- 10 Volunteer Spotlight | Lisa Rutter
- 12 Chapter Update | Student Learns Firsthand About Industry
- 14 Photostream | Advanced Therapy Medicinal Products Conference; PDA Visitors
- 16 Publishing Intern Expands Horizons at PDA

#### Science

- 18 Science Snapshot | Interest Group Corner: Adventitious Virus Detection Tech IG Activities Prove Infectious at 2019 PDA Virus Safety Forum; Journal Top 10: Particulate Matter Papers in Top 5 of Most-Read PDA Journal Articles
- **19** Technology Trend | Avoid Unmixed Process Solutions

#### Regulatory

- 36 Regulatory Snapshot | PUPSIT and the Annex 1 Revision
- 42 Comments | Suggestions for FDA Voluntary Recalls Doc
- 44 Incorporating QRM into Cell and Gene Therapy Processes

#### Voices of PDA

46 Voices of the Board | Science and Tech Lead the Way

#### Digital Exclusives

- > On the Issue | A Particulate Matter Lifecycle Approach in Harmony with <1790> Gateway Analytical's Antonio Scatena discusses USP <1790> at the 2019 PDA Visual Inspection Forum.
- On the Issue | Here They Come: Pharma Students Keck Graduate Institute Student Lyanna Jauregui discusses her poster at the 2019 PDA Annual Meeting with the Southern California Chapter's Jason Kerr.
- > Are Your RMM Organisms Reflective of Your Process? Find out how you validate your rapid method.

#### pda.org/letter

#### PDA GLOBAL HEADQUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 *info@pda.org www.pda.org* 

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### PDA TRAINING & RESEARCH INSTITUTE

#### November/December 2019



# FDA Takes Close Look at Innovation

Industry 4.0. Artificial intelligence. Big data. Even continuous manufacturing. All of these new technologies will drive the future of pharmaceutical and biopharmaceutical manufacturing. Yet questions persist as to how the U.S. FDA and other global regulatory agencies will address these new technologies, leaving some companies reluctant to fully embrace these advances as early adopters.

**PDA** Letter

Cover Photo by Christopher Ames

# 34

# Robotics and Big Data Key to Lab of the Future

Peter Crane, Synthace

I had the good fortune to attend the *Digital Robot Pharma Fab* workshop and the 4<sup>th</sup> PDA *Europe Annual Meeting* in Amsterdam this past June.

#### Add Sherlock Holmes to Your Investigation Team The Role of a Microbiologist in Teams Investigating Product Failures Due to Manufacturing Issues

Tony Cundell, PhD, Microbiological Consulting, LLC

You have reported a microbial test failure to your site's management following confirmation by a laboratory investigation. You then assemble a cross-functional team to investigate the most likely cause of the failure during manufacturing.

#### III. InfoGraphic

42

# Data Integrity: Remediation and Quality Culture

The 2019 Data Integrity Workshop opened with a real-time survey of attendees, the majority representing pharma/biopharma manufacturing. Here are some highlights that pertain to remediation and quality culture.





www.pda.org/pdaletter

The PDA Letter is published 10 times per year, exclusively for PDA members.

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

Subscriptions are not available

Articles in the PDA Letter may be reproduced with permissioncontact the PDA Letter Managing Editor for details. © PDA 2019

#### PDA LETTER STAFF EXECUTIVE STAFF Senior Director of Publishing **Richard Johnson**

Walter Morris (301) 656-5900, ext. 148 morris@pda.org

> **Managing Editor** Rebecca Stauffer stauffer@pda.org

Graphic Designer Katja Yount yount@pda.org

PDA LETTER EDITORIAL COMMITTEE

> Marcia Baroni Eli Lilly & Company

Mirko Gabriele

Stephanie Gaulding Pharmatech Associates Richard Hameister **Coherus Biosciences** 

Pluristyx Inc.

Alcon

Zena Kaufman

SOFIE

Eurofins

Andiyanto Sutandar, PhD HGP Asia Pte. Ltd.

> Cecilia Turoff Pfizer

Wendy Zwolenski Lambert Novartis

> Kelly Waldron ValSource

#### ADVERTISING SALES

Vice President, Sales David Hall

President & CEO David Talmage Sr. VP, Education Tina Morris, PhD VP, Scientific & Regulatory Affairs Jennifer Bell VP, Finance Debbie Goldstein VP, Marketing David Hall

Joanne Beck

Celaene Walid El Azab

STERIS

Patheon

Brian Hawkins, PhD

Tamer Helmy, PhD Baxter Healthcare

ZGK Quality Consulting

Gwendolvn Lohr Novo Nordisk

Frank Matos

Aaron Mertens STERIS

Ajay Pazhayattil

Veronique Davoust

Ghada Haddad

#### Stephan Krause, PhD

(301) 656-5900 ext. 160 Emma Ramnarine

VP, Sales Falk Klar, PhD VP, PDA Europe Molly Moir VP, Programs & Meetings Trevor Swan Director, Membership & Chapters PDA BOARD OF DIRECTORS OFFICERS

Chair | Rebecca Devine, PhD Regulatory Consultant Chair-Elect | Jette Christensen, PhD Novo Nordisk Treasurer | Michael Sadowski

Secretary | Steven Lynn

Lynn Consulting Imm. Past Chair | Martin VanTrieste Civica Rx

DIRECTORS

Masahiro Akimoto Otsuka Pharmaceutical Factory, Inc. Barbara M. Allen, PhD

Eli Lilly Michael Blackton

Adaptimmune Jovce Bloomfield

Bettine Boltres, PhD West

Pfizer

Merck

### AstraZeneca Biologics

Mary Oates Lachman Consultant Services, Inc. hall@pda.org Genentech/Roche Anil Sawant, PhD

> Merck & Co./Merck Sharp & Dohme Melissa Seymour Bioaen

Articles published in the PDA Letter do not represent the official positions of PDA, Inc., but are the opinions of the authors submitting the articles.

# Departments

#### News & Notes

#### 10 PDA In the News

11 Call for Volunteers: Regional Editions of PDA Letter

#### People

- 12 Volunteer Spotlight | Karolyn Gale
- Chapter Update | Life Science Panel Discusses Career Journeys 14
- Photostream | 2019 PDA/FDA Joint Regional Conference 16

#### Science

- 20 Science Snapshot How to Implement an Effective Big Data Strategy
- 22 Technology | How to Qualify Your Disinfectants
- 27 Tri-Spine Crab Now on Endangered List

#### Regulatory

- 45 **Comments** | PDA Responds to EMA Combo Product Reg; PDA Input on USP 2020-2025 Revision Cycle
- 48 An Inside Look at the 2019 PDA Quality Week
- 50 Get Your Data Integrity Basics Down for Success

#### Voices of PDA

54 Voices of the Board | 2019: A Global Launch for PDA

#### Digital Exclusives

Strategic Application of Advanced Analytics for CGT Development Advanced analytical data can help ensure a stable pipeline of cell and gene therapy products and even address CMC issues.

pda.org/letter

#### PDA GLOBAL HEADQUARTERS

4350 East West Hwy., Suite 600 Bethesda, MD 20814 USA Tel: +1 (301) 656-5900 Fax: +1 (301) 986-0296 info@pda.org www.pda.org

#### PDA EUROPE — AM BORSIGTURM 60

Am Borsigturm 60 13507 Berlin, Germany Tel: 49 30 4365508-0 Fax: +49 30 4365508-66 info-europe@pda.org

#### **PDA TRAINING & RESEARCH** INSTITUTE