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# Cover



# Proposed CDER Office Seeks to Change Quality Paradigm in Industry

Many industries set high standards for quality and base their branding on achieving high quality goals. This is most notable in the automobile industry, where carmakers such as Toyota (the Toyota Way) and Ford (Quality is Job 1) made it their corporate missions to promote the quality of their vehicles. And when quality defects impact their products (failing tires for Ford; unintended acceleration/brake problems for Toyota), the companies' sales take a big hit.

Cover Art Illustrated by Katja Yount

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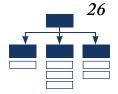
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# **New CDER Office Seeks Improved Pharma Supply Chain**

It has been 18 months since the U.S. FDA reorganized CDER's Office of Compliance, designating it as a "Super Office" and creating a number of new "Offices" within it: Office of Drug Security, Integrity, and Recalls (ODSIR), Office of Manufacturing and Product Quality (originally the Division of Manufacturing and Product Quality), Office of Scientific Investigations, and the Office of Unapproved Drugs and Labeling Compliance.



# **Microbiologists Key in Preventing Contamination**

"If you see something, say something" has been the mantra of numerous homeland security agencies across the country and worldwide for over a decade. While aimed mostly at commuters, this message can also be applied to the microbiologists diligently working to identify microbial contaminants in the pharmaceutical industry.

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# 20 Making the Case for QbD in Vaccine Development

Is it time for vaccine manufacturers to consider utilizing QbD principles in vaccine development? Leading experts from both industry and regulatory think so, and cite the A-VAX case study as proof.

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#### **QbD** and Vaccines: PDA IG Members' View

The PDA Letter worked with the Vaccines Interest Group to conduct this survey on QbD in vaccines manufacturing to get a sense for the uptake of QbD principles within their operations, and if not, why. We also wanted to ascertain what QbD means to their companies.



# **Networking, PDA Involvement Keys to Success for Lisa Skeens**

Are you looking to make a career change in the coming year? Do you want to move up to a management position? Are you curious what skills hiring managers are looking for in potential hires? The beginning of a new year marks a time when many people evaluate their careers and make plans look for a new role or explore options outside of their current employer. With this in mind, the *PDA Letter* reached out to Lisa Skeens, PhD, Vice President of Global Regulatory Affairs at Hospira, and PDA Board Member.



# **Parenterals Conference Draws 200 to Spain**

Almost 200 professionals from the pharmaceutical industry, from technology and equipment suppliers to government agencies convened in Barcelona, Spain Nov. 6-7 for the 2012 PDA Parenterals: Contribution of Biologics to Public Health. This symposium focused on the manufacture of biopharmaceutical products. Presentations covered numerous areas impacting the manufacturing of biopharmaceuticals, including: new guidelines on manufacturing and validation, manufacturing environment, manufacturing technologies, components (such as elastomers, containers, devices and efficiency), and cost and compliance.

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## 18 Global Regulators Address Role of Quality in Shortages, Seek Solutions

Health authorities worldwide are grappling with the surge in drug product shortages that has been exacerbated by recent plant closures at a few large generic injectable manufacturers. The U.S. FDA, the EMA and other regulatory authorities are seeking solutions that ensure an ample supply of medication without sacrificing quality and endangering patients.

Cover Art Illustrated by Katja Yount

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Karen Ginsbury, PCI, and Tricia Griffiths, EMD Millipore, respond to the FDA's concerns



#### 28 **Drug Shortages in the United States: A Snapshot**

Using information from the recent Clinical Pharmacology & Therapeutics article on drug shortages, plus information from other sources, the PDA Letter developed an infographic showcasing the various reasons behind the shortages.



# 2013 PDA Annual Meeting Plenary Talk to Address Shortages 30

The recent article by Janet Woodcock, MD, Director, CDER, U.S. FDA, and Marta Wosinska, PhD, Director, Economics Staff, CDER, FDA, explored the link between quality-related manufacturing issues and shortages of generic injectable drugs (see story on p. 18). So, what can manufacturers do to alleviate the issue of drug shortages? And how can quality serve as a guide throughout the entire manufacturing process?

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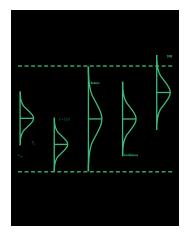
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# 18 Risk and Statistics Serve as Tools for Solving Variation Riddles and Creating Robust Processes

How much variation is acceptable in our products and processes? For such a simply stated question, the answer can be quite complex, especially when applied to drug product Stage 2 testing (Process Performance Qualification, or PPQ). It is a question industry needs to begin answering at the initiation of Stage 1 activities, with risk management as the key tool and driver in assisting to solve variation riddles and help drive knowledge management

Cover Art Illustrated by Katja Yount

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#### U.S. vs E.U. Process Val Guidances 26

This issue's infographic details some of the similarities and differences between the E.U. and U.S. process validation guidances.



#### 28 U.S. FDA Offering "Q" Metrics for Payers – A Good Idea

In March, the PDA Letter sat with Amgen's Martin VanTrieste to discuss the impact quality-related problems in the pharmaceutical industry is having on the marketplace for drug products. Prompting the conversation was the article by two U.S. FDA officials in which they suggested that the lack of market reward for high quality products. The FDA authors also suggest that the Agency could help consumers and healthcare payors better understand quality's important role by offering "meaningful manufacturing quality metrics." The PDA Letter analyzed this article and other regulatory initiatives worldwide (see the cover story of the March 2013 PDA Letter).

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# 18 Take Charge of Your Career! Practical Guidelines for Career Planning and Advancement

Careers can be summarized as the time a person spends working at their individual jobs and all of the experiences, education and professional relationships that go along with those jobs. However, career planning and advancement often defines what a person's body of work will look like and the degree of satisfaction they will gain. Many times we see people owning what they perceive to be their career, only to be taken back a step when challenged as to what they truly are striving for professionally, or put another way, what is the last seat they desire to sit in prior to retirement.

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# 28 Pharma Manufacturing Recruitment in 2013—and Beyond

Since the Great Recession took hold, the pharmaceutical manufacturing sector has held a unique position in the economy. Traditionally, and according to the U.S. Bureau of Labor Statistics, this industry has not been prone to wavering economic conditions. After all, when we are sick, we still need our medicine. We still need the innovative work of the pharmaceutical industry to keep us healthy so we can cope with all the other challenges that life brings.



### 30 U.S. Pharma Manufacturing Jobs in 2012

This issue's infographic uses 2012 data from the U.S. Bureau of Labor Statistics to build a profile for the state of management, science and production jobs in drug manufacturing.

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## 22 Should Scientific Data Determine Cytotoxic Limits?

Over the past few years, regulatory bodies have explored the issue of exposure limits during the manufacture of cytotoxic drugs in multipurpose facilities. A recent draft EMA guideline and the proposed revisions to chapters 3 and 5 of the EU GMPs appear to propose the use of toxicological data along with some rather stringent and apparently not scientifically based criteria to determine exposure limits when working with potent/highly potent drugs.

Cover Art Illustrated by Katja Yount

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#### 28 BD Moves into Sterile Injectables Market

This March, BD Rx, a wholly owned subsidiary of BD (Becton, Dickinson and Company), received approval for the first product in the company's line of BD SimplistTM prefilled injectables. BD Rx plans to roll out 20 to 30 more generic sterile injectable drug products over the next few years, including some products that have been in the news as being in shortage. This development has occurred at a time when significant numbers of generic injectables are in shortage, a situation the *PDA Letter* analyzed in the March 2013 cover story. Becton Dickinson opened a facility in 2010 in Wilson, N.C. specifically dedicated to manufacturing these products—the first U.S. facility dedicated to sterile manufacturing built in many years.



### 32 Sterile Product Manufacturing: A History

This issue's infographic highlights key moments in the history of the manufacture of sterile products within the industry.

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# 28 Management, We Have a Problem

Over the past decade, several large pharmaceutical companies have entered into consent decrees with the U.S. FDA and it seems that the Agency has increased its use of this enforcement tool. So far, very few companies have been successful in terminating a consent decree with the FDA. One of the few companies that successfully completed the items agreed upon with the FDA, and demonstrated continuous compliance with cGMPs, is Abbott Laboratories. This article discusses the main pitfalls in dealing with a consent decree and methods for handling one.

Cover Art Illustrated by Katja Yount

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# 34 Regulators to Offer Perspectives on Investigations, Metrics at Joint Regulatory Conference

The PDA Letter spoke with **Rick Friedman**, Associate Director, OMPQ, CDER, and **Mahesh Ramanadham**, PharmD, Acting Team Leader, OMPQ/OC, both from the U.S. FDA and members of the planning committee for the *2013 PDA/FDA Joint Regulatory Conference*. Friedman is also the co-chair for the subsequent *2013 PDA/FDA Improving Investigations Workshop*. Friedman and Ramanadham were excited to discuss topics of interest that will be discussed at the conference and workshop.



# 36 cGMPs Continue to Evolve as U.S. FDA Expands Regulatory Authorities Under FDASIA

The U.S. Food and Drug Administration Safety and Innovation Act (FDASIA), passed last year, includes provisions that give the U.S. FDA greater statutory authorities with regard to cGMPs. The PDA Letter spoke with **Cathy Burgess**, Partner, Alston & Bird, who will speak about the evolution of cGMPs as they relate to the FDASIA legislation during the third plenary session at the upcoming 2013 PDA/FDA Joint Regulatory Conference.



#### 38 Common Elements of a Consent Decree with the U.S. FDA

This issue's infographic looks at some of the common elements of consent decrees.

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# Cover



## 28 Roadmap to External Manufacturing Partnerships

The pharmaceutical industry is increasingly reliant on outsourcing to progress products from development through commercial registration. The times of building large facilities and staff to support all facets of drug development and registration is becoming less and less common and only achievable by the largest of companies. Instead, companies now share responsibilities with specialized external manufacturing partners (EMPs) to build tangible value, focusing on core competencies. A strategic partnership is an asset that adapts as the product pipeline, technology platforms and requirements develop over time.

Cover Art Illustrated by Katja Yount

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#### Micro Contamination Prevention Remains Big Concern for Manufacturers of 32 **Nonsterile Products**

The microbiological control of finished nonsterile products remains a prime concern among pharmaceutical manufacturers. The paucity of regulatory guidance does not help. In 2011, Erik Greb wrote: "So far, no regulatory authority has set formal microbial-control standards for the manufacture of nonsterile dosage forms".



#### 36 **Biopharmaceutical Manufacturing Outsourcing in 2013**

This issue's infographic uses data from BioPlan Associates' 2013 survey of biopharmaceutical manufacturers to highlight outsourcing trends within the industry.



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## 18 Key Factors for Validating A Disposable System

Adopting and implementing single-use systems involves more than a simple use of disposable items. Essentially, adopters accept to transfer critical control parameters like sterility and cleanliness to a third party. The validation and quality control strategy followed by the end user will then shift to a process of building a partnership with the supplier to gain assurance and set measurable performances.

Cover Art Illustrated by Katja Yount

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# **Features**



New Technologies Bring Device Training to Patients

As patients, healthcare providers and other industry participants increase the demand for treatments that improve lives, there remains a significant preexisting condition within the healthcare industry: patient adherence. Most treatment outcomes rely heavily on adherence and compliance to ensure healthy outcomes. Therefore, the future success of new treatments is directly associated with solutions designed to improve adherence rates, making the timing optimal for new designs to accelerate the transfer of knowledge related to these treatments.



Company Relies on Comprehensive Approach to Address New Combo Product Rule

Earlier this year, the U.S. FDA issued its final rule on cGMPs for combination products, which went into effect this July. This new rule specifies that companies manufacturing combination products can satisfy cGMPs by demonstrating compliance with applicable rules on a separate basis of by meeting the cGMP regulation and relevant 21 CFR 820 requirements or meeting quality system regulations (QSR) and 21 CFR requirements. The *PDA Letter* spoke with **Katja Kotter**, Director of Regulatory Affairs and Quality Compliance, Vetter Pharma, who will speak about the new FDA guideline at PDA's upcoming *Universe of Pre-filled Syringes and Injection Devices* conference.



30 SUS Supply is a Complex Journey

This issue's infographic explores the complex journey that accompanies supplying a single-use system using information from the upcoming PDA technical report on the subject.

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#### 32 Crossover Moves

In basketball, a well-executed crossover move gives the ball handler a clear path to the basket. There, she can either dish off for an assist or score an easy layup. The *PDA Letter* staff has identified another kind of crossover move—the career crossover. This happens when a professional with a long track record in the industry leaves to join a regulatory agency, or vice versa. When played well, this crossover opens up a clear path to professional growth and fulfillment. The *PDA Letter* editors interviewed six individuals who executed this move in recent years.

Cover Art Illustrated by Katja Yount

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### 38 A Sampling of Sought-After Industry/U.S. FDA Jobs

This issue's infographic looks at some recent job openings in industry and regulatory.



# 40 Reports from the 2013 PDA/FDA Joint Regulatory Conference

Around 1300 people participated in the *2013 PDA/FDA Joint Regulatory Conference*, held in Washington, D.C. Sept. 16–18. This was the highest attendance figure in the history of this annual event, as asserted by PDA Chair, **Anders Vinther**, PhD, during the opening plenary session.

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