PDA Comments
ICH Q10; Pharmaceutical Quality System
October 2007

Section	Line No.	Comment	Suggested Revision
1.1	54	The inspectional impact of the optional nature of Q10 beyond what is required by current GMP can be further clarified.	Modify the sentence beginning with "Consequently, the content of ICH Q10 …" by adding at the end "…and not subject to review in the course of routine inspections."
1.1	After line 62	This paragraph provides an opportunity to strengthen the understanding of the relationship between ICH Q8, Q9, and Q10.	Add the following sentence at the end of the paragraph. "In combination with ICH Q8 and Q9, ICH Q10 will enable a desired state of drug development and product and process quality while reducing the barriers to continual improvement."
1.2	73	Novel excipient development is not required for all products	Add "where applicable" after the words "novel excipient development" and remove the ";"
1.2	79	Given site transfers can and frequently do occur during development this section should include that possibility.	Add as the first bullet "Site transfers during development;".
1.4	107-108	In reference to the sentence "When implemented, the effectiveness of the pharmaceutical quality system can normally be confirmed during a regulatory inspection at the manufacturing site.". Regulatory inspections are only one measure to provide assurance that a firm's pharmaceutical quality system is effective.	Additional measures to provide evidence of quality system effectiveness, such as annual product/process reviews, quality system reviews, data on complaints and recalls, etc. should also be listed.
1.5	120	The term "control" is more appropriate than the term "capability".	Replace the phrase "thereby providing assurance of continued suitability and capability of processes" with "thereby providing assurance of continued suitability

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			and control of processes".
1.5	121	Quality risk management is also a valuable tool for the ongoing evaluation of a monitoring and control system.	Change the phrase "establishing the monitoring and control system" to "establishing and evaluating the monitoring and control system".
1.5	126-127	Quality risk management is one tool to facilitate the identification and prioritization of areas for improvement.	Change the sentence "Quality risk management can be useful to identify and prioritize areas for improvement." to "Quality risk management as well as feedback systems such as Corrective Action/Preventive Action (CAPA) are useful tools for identifying and prioritizing areas for improvement."
1.6	144	Quality risk management also includes scientific evaluation.	After the words "identifying" add ", scientifically evaluating,".
1.7	150	Roles and responsibilities as well as decision making processes are also critical elements to a pharmaceutical quality system.	Add a second sentence to 1.7 i) "Additionally, responsibilities as well as decision making processes should be defined clearly."
1.7	153	Recognition of the state of product knowledge would strengthen point 1.7 ii).	After the word "goals" add "and product knowledge".
1.7	166-167	A pharmaceutical quality system should include an evaluation of the effectiveness of the quality systems.	After the words "Section 3" add "and pharmaceutical quality system effectiveness, as described in Section 4."
1.7	168	In some companies key performance indicators are financial indicators.	Replace the phrase "key performance indicators" with "performance metrics".
1.8	177-178	The sentence "Identification of the processes within the pharmaceutical quality system, as well as their sequences, linkages, and interdependencies." is too prescriptive and could lead to confusion and debate.	Replace the phrase "Identification of the processes within the pharmaceutical quality system, as well as their sequences, linkages, and interdependencies." with the phrase "A description of the quality system's organizing principles."
2.1	192	It is important to not only monitor but to monitor the effectiveness of the pharmaceutical quality system.	Add before the word "pharmaceutical" the words "effectiveness of the".

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2.1	194	It is important to not only monitor but to monitor the effectiveness of the pharmaceutical quality system.	Add after the word "implementation" the words "and effectiveness".
2.1	199	The definition of decision making processes is also an important management responsibility.	Add after the word "interactions" the words" and decision making processes".
2.1	205	Management should approve and implement needed changes as well as advocate continual improvement.	After the word "improvement" add the phrase "and approve and implement needed product and process changes".
2.2	208-209	Senior management should ensure that a quality policy is established. Senior as well as all levels of management should endorse, enable and be advocates of quality policy.	Replace the sentence "Senior management should establish a quality policy that describes the overall intentions and direction of the company related to quality." with "Senior management should ensure that a quality policy that describes the overall intentions and direction of the company related to quality is established. All levels of management, including senior management, should endorse, enable and be advocates for the quality policy. "
2.2	210	Meeting regulation is a requirement, not an expectation.	Replace the words "an expectation" with "the requirement".
2.3	221-222	The interpretation of a "company's strategic plans" will vary greatly across the diversity of companies to which this document applies. Therefore, alternative wording is suggested.	Replace the sentence "Quality objectives should align with the company's strategic plans and be consistent with the quality policy." with "Quality objectives should align with a company's corporate strategy and direction and be consistent with the quality policy."
2.3	225	In some companies key performance indicators are financial indicators.	Replace the phrase "key performance indicators" with "performance metrics".
2.4	240-242	Simplifying the wording of "Communication processes should ensure the escalation of certain product quality and pharmaceutical quality system issues to appropriate levels of	Replace with the sentence "Communications processes should ensure the appropriate and timely escalation of product quality and pharmaceutical quality system issues."

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		management in a timely manner." can enhance the clarity and intent of the sentence,	
2.7	253	The word "normally" could lead to confusion and debate.	Replace the words "Normally under" with "Unless otherwise stipulated in".
3.1	298	It is important to not only identify improvement opportunities but to implement them as well.	Add after the word "identified" the words "and implemented".
3.2	319	The term "feed forward" is not commonly used terminology and may not be understood.	Define the term "feed forward".
Table I	336-337	Alternative wording is offered to this table as well as subsequent tables to clarify or enhance the content; these suggestions are labeled henceforth--Table wording suggestion.	Replace the sentence "Quality risk management and monitoring conducted throughout development can be used to establish a control strategy for manufacturing." with "Design space knowledge generated and product and process monitoring conducted throughout development can be used to establish a control strategy for manufacturing."
Table I	336-337	Table wording suggestion	In the Development column replace the word "Monitoring" with the words "Knowledge obtained".
Table I	336-337	Table wording suggestion	In the Technology Transfer column replace the words "Monitoring of" with the words "Knowledge obtained during".
Table II	350-351	The term "feed forward" is not commonly used terminology and may not be understood.	In the Technology Transfer column define the term "feed forward".
3.2	352-386	The section on change management can be improved and clarified. Simplified and streamlined wording is proposed	Modify current section (2) to add after "evaluated" the words "and justified" plus add a sentence after the first sentence of section (2) "The level of effort and complexity of the evaluation should be commensurate with the level of risk." In current section (5) add before the words "submission/approval" the additional word "notification/submission/approval". Delete sections (1) and (3), reducing the sections to three.

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Table III	389-390	Table wording suggestion.	In the Technology Transfer column, modify the sentence "The change management system should provide management and documentation of adjustments made to the process during technology transfer activities." to "The change management system should provide justification, management, and documentation of adjustments made to the process during technology transfer activities."
3.2	399	The management review should also include a review of the commitments made.	After the introductory words "The results of" add the words "and the commitments made to".
3.2	409-413	The examples of appropriate action are not lettered appropriately and could lead to confusion.	End the sentence after the word "action" and change to "actions.". Delete examples lettered (d) through (f).
4.1	426	Enhance the concept of management expectations.	Enhance the introductory phrase "The review should include:" to add "The review should reinforce management's expectations to continually improve the pharmaceutical quality system and should include:"
4.1	428	In some companies key performance indicators are financial indicators	Delete the words "key performance indicators" and replace with "performance metrics".
4.1	430	Enhance the concepts of effectiveness assessment by adding the concept of trending.	Add after the word "processes" the words "and trends"
4.1	After Line 433	Risk management is an important management review item.	Add an additional item "(4) Risk assessments and control and remediation plans."
4.2	440	The intent of including Section 4.2.iii could be clarified.	Change the wording to “Changes in business strategies and objectives which could impact a firm’s quality policy.”
4.3	447-448	Strengthen management's expectations.	Begin the sentence with the words "Documentation and". After the word "results" add "and expectations". Change the words "senior management" to "appropriate levels of management".

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Annex 1	529-536	This annex could be clarified and improved by expanding on the Note.	Revise the Note section by replacing the current text with the following: "Firms who have demonstrated successful implementation of a Pharmaceutical Quality System and risk management program may be considered for flexible regulatory approaches. The following table reflects some examples of how these flexible regulatory approaches might occur. Initially, the degree and type of flexible regulatory approach would be based on the laws and regulations in place within each of the ICH regions. The ultimate goal would be to achieve a universal framework to providing flexible regulatory approaches.