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European Medicines Agency
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EMEA Concept Paper Regarding Computerised Systems

ISPE welcomes the opportunity to comment on the EMEA Concept Paper Regarding Computerised Systems. Our comments are attached. As you will see in the comments, we support the proposal and have grouped our comments by Chapter and Annex/Specific areas. If you have any questions please do not hesitate to contact me.

Thank you for the opportunity to comment.

Yours sincerely,

Robert P. Best
President/CEO

ISPE Comments on EMEA Concept Paper Regarding Computerised Systems

ISPE is the Society of choice for more than 23,000 pharmaceutical manufacturing professionals in 81 countries. ISPE aims to be the catalyst for "Engineering Pharmaceutical Innovation" by providing members with opportunities to develop technical knowledge, exchange practical experience, and collaborate with global regulatory agencies. We support the proposed revision and welcome the opportunity to submit comments in response to the EMEA Concept Paper.

- **Chapter 4 - General:** For simplicity and ease of use of the GMP Guide it would be beneficial to have document management and record-keeping expectations in Chapter 4 focus on control of the document management process, regardless of whether the supporting processes are automated, manual or hybrid. We recommend that generic computerised system expectations are defined separately in Annex 11.
- **Chapter 4 - Scope:** The current scope of application of Chapter 4 does not need to be extended to include investigational materials through to submission. We recommend Chapter 4 maintain its original focus on GMP manufacturing and supporting quality operations. Clinical R&D activities are already governed by their own regulations appropriate to their needs.
- **Annex 11 – General:** We believe that the current level of detail in Annex 11 is appropriate and sufficient. Consequently we recommend that the approach of defining fundamental principles rather than prescriptive detail be maintained in any revision. Moving general content from PIC/S 'Good Practices for Computerised Systems in regulated GxP Environments' document into Annex 11 will not add clarity or value. Practitioners should be expected to consult recognised industry and regulatory sources for detailed guidance, e.g. PIC/S, GAMP Guidance, ASTM, and ISO standards.
- **Annex 11 – Terminology:** We recommend the use of the term 'verification'. This will assist to remove ambiguity between 'validation' and the emerging use of 'verification' as an umbrella term meaning 'fit for use' as used by ASTM in their E55 standards. Terminology used in Annex 11 should be consistent with evolving industry and regulatory sources (e.g. EU GMPs, ISO 9000:2000, ICH, ASTM).
- **Annex 11 – Risk Management:** The decision to validate, and the extent of the validation, should be based on a science-based assessment of risk to patient safety. This is consistent with the direction being set by ICH Q8, Q9 and Q10. We suggest that the addition of this principle is preferable to extensive revisions to multiple sections to address ICH Q9 proposed in the EMEA Concept Paper. It may not be practicable to provide sufficient specific detailed instruction appropriate for the broad range of systems covered by the regulations (e.g. from spreadsheets to ERP systems).

- **Annex 11 – Electronic Records & Signatures:** The information management and security requirements in ISO 17799 are too detailed for Annex 11. Instead we propose the inclusion of an additional principle to indicate that the integrity of records and signatures created and stored electronically should be assured through application of current industry good practice. Implemented controls should be commensurate with the impact of records and signatures on patient safety.
- **Annex 11 - PAT:** We believe that the principles embodied in Annex 11 should be suitable for a broad range of computerised systems. Specifically, a science and risk based approach to the management and control of computerised systems should be applicable to all systems. Consequently, we recommend that Annex 11 does not identify separate PAT requirements, either for document management systems or for real-time monitoring and control systems. Computer technology is developing rapidly and being too specific may lead to expectations within Annex 11 becoming out dated as technology advances. Equally, too much detail in regulations can inhibit innovation.
- **Further Consideration - Annex 15:** Some computerised systems such as automated autoclaves need to satisfy the expectations of both Annex 11 and Annex 15. We suggest it is worthwhile to carefully consider whether it is appropriate to combine these two annexes. We recommend that a consistent approach to equipment, automation, utilities and computer systems be promoted based on shared science and risk based concepts and methodologies to ensure they are fit for use.

Finally we recommend that the EMEA Drafting Group liaise with various industry expert groups to help develop the final text. ISPE is supporting the development of innovative science and risk based approaches for the pharmaceutical industry (e.g. preparing the 5th edition of the GAMP® Guide for computerised systems, ASTM E55, ISPE Baseline® Guides, and other pharmaceutical engineering guides) and would be happy to support the work of the EMEA.

Thank you for your consideration.

Yours sincerely,



Robert P. Best
President/CEO
ISPE