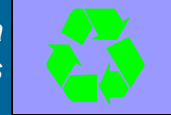
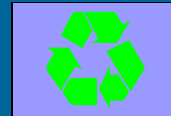


Risk Management: Risk management will play a more formal role in the CMC regulatory process as Q8 and 10 implementation proceeds



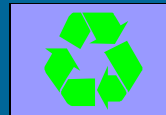
- *How much risk assessment information should be filed – in what depth and on what QbD issues? [Note: Risk assessments are not filed with device applications, only the product requirements, and the output or risk assessment, e.g., ID of CQAs and CPPs.]*
- *What risk management information will inspectors want to see related to the quality system?*

Risk Management



- *Should a task force be put together to address these risk management issues? These task groups could help establish risk acceptance criteria potentially on a product type basis – for example, for OINDPs.*
- *Should a mechanism be established for sharing of failure information?*
- *Should there be a Q9 annex to focus on implementation examples?*

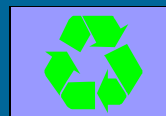
International harmonization:



The different manufacturing change regulations and procedures internationally present potential stumbling blocks to the regulatory flexibility offered by QbD.

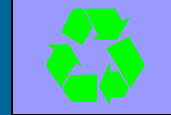
- *How can these stumbling blocks be overcome? Does Q8-10 offer a way of doing an end run around these stumbling blocks? (Need to avoid side by side systems.)*
- *What are other challenges in developing a global QbD-based CTD? Does the CTD itself need to be revised to better accommodate QbD?*

International harmonization:



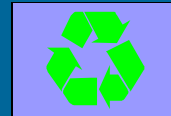
- | *What in the QbD information submitted is a regulatory commitment and how is this defined?*
- | *What other harmonized guidance would help further the new paradigm internationally? Should the device regulatory approach be included?*

Management's role:



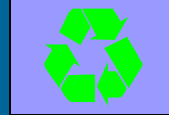
- | *The transition to the new paradigm requires a corporate-wide commitment to a risk-based quality system that extends beyond the traditional quality organization. Q10 puts corporate management at the head of the quality system and inspectors are paying attention to how management is meeting its responsibility during inspections.*
- | *Senior management also needs to be directly involved to bring the departments together and provide the resources needed to shift to a more QbD-based product commercialization process.*

Management's role:



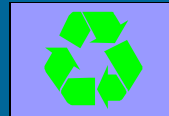
- | *Without clear regulatory requirements, will management be willing to make the investment in QbD? Are they hearing the message? How can the message be made stronger and resistances overcome?*
- | *Following the device model, should/will the QbD principles become requirements as "current" practice evolves?*

QbD linkage to clinical performance:



- | *Quality by design ultimately rests on better understanding a product's structure/function relationship and the impact of changes in the product and process on safety and efficacy. Understanding the linkages is particularly challenging in the context of the complexities of biotech product and processes.*
- | *The biotech API QbD application pilot and mock initiatives getting underway will wrestle with the challenges in defining the critical quality attributes of the API and how the impact of the quality attributes on clinical performance is determined.*

QbD linkage



- | *How is the understanding of this relationship advancing? Is this QbD building block solid?*
- | *Where are the gaps that need filling for OINDPs?*