Workshop - Mercoledì 10 giugno

SIMPOSIO AFI

Risk-based thinking come vera intelligenza per il mondo farmaceutico

Moderatori

Piero Iamartino
AFI

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PTM Consulting

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Informed decisions for better process

Workshop schedule

10:10 – 10:40	**La nuova era dell'intelligenza del rischio**
10:40 - 11:10	Nuova ICH Q1: product intelligence per un approccio innovativo alla stabilità
11:10 – 11:35	ICH Q3E: approccio risk-based integrato per la valutazione di E&L
11:35 – 12:00	Il dato come bussola: l'analisi statistica a supporto del rischio
12:00 – 12:25	Dalla teoria alla pratica: dalla gestione dello studio di stabilità all'analisi dei dati
12:25 – 12:30	Conclusione dei lavori

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The new «era» for risk-based thinking and risk intelligence

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Contents

Introduction: are we still talking about risk?

Any new definition?

Risk Definition

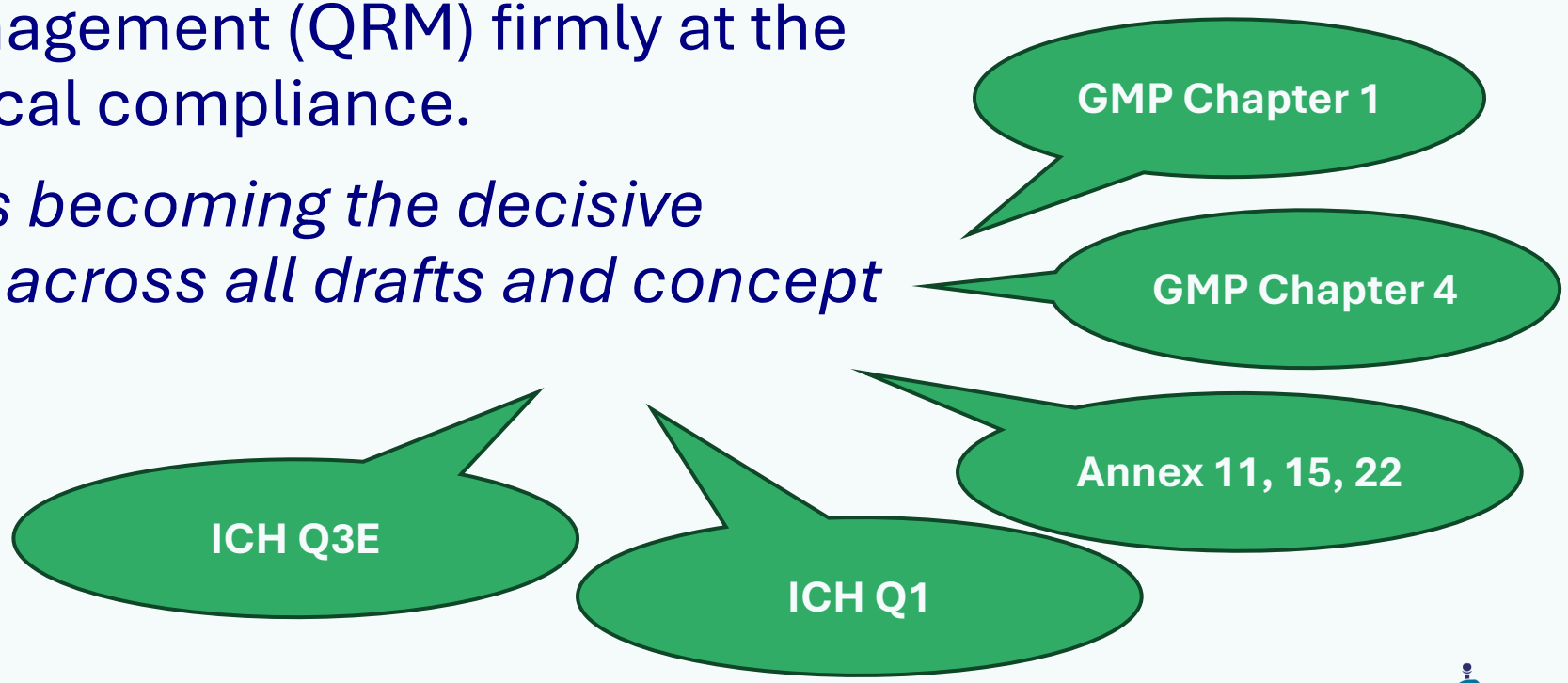
Combination of the probability of **Occurrence (O)** of harm and the **Severity (S)** of that harm.

$$Risk = f\{o;s\}$$

Harm *Cause* *Effect*

The expectation …

- The current revisions of the EU GMP Guidelines place Quality Risk Management (QRM) firmly at the centre of pharmaceutical compliance.
- *Risk-based thinking is becoming the decisive regulatory expectation across all drafts and concept papers.*



… and the reason why

RISK IS THE ENABLER TO INFORMED AND OBJECTIVE DECISION

Let's stress the difference between:

RIGHT DECISION

something that can not be evaluated until the project end

CORRECT DECISION

best decision you can take with the objective and consistent data you have in your hands

PROCESS UNDERSTANDING ALLOW

to transform Technical information into **Quality and Business decision**

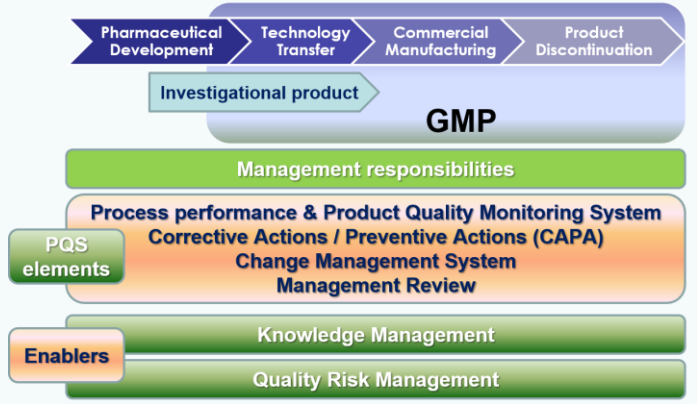
CLEAR COMMUNICATION

through different level of knowledge

Revision expected in 2026

Eudralex Vol. 4 GMP Chapter 1 «Pharmaceutical Quality System» (I/II)

- The revised Chapter 1 reflects the updated ICH guideline on Quality Risk Management, ICH Q9(R1), strengthening **knowledge management** and **risk management** across the **product lifecycle**.
- Alignment with ICH Q9(R1) fosters a **proactive, evidence-based culture that reduces variability in quality outcomes**. By embedding risk-based decision-making and emphasising scientific rationale and proportionality in risk assessment, it ensures consistent product quality and availability.



Eudralex Vol. 4 GMP Chapter 1 «Pharmaceutical Quality System» (I/II)

- The revision also stresses the importance of **proactive identification of manufacturing risks to prevent shortages** and mitigate supply chain vulnerabilities, thereby safeguarding patient safety and public health.
- The guideline also clarifies requirements for **product quality review**, particularly regarding product grouping and situations where only a limited number of batches were manufactured during the review period.

EUROPEAN COMMISSION

Strasbourg, 11.3.2025
COM(2025) 102 final

2025/102 (COD)

Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

laying a framework for strengthening the availability and security of supply of critical medicinal products as well as the availability of, and accessibility of, medicinal products of common interest, and amending Regulation (EU) 2024/795

(Text with EEA relevance)

Chapter 1 Product Quality Review

Data evidence and risk evidence represent the key element to ensure product quality.

Trending data from the previous product quality review should be included in cases where few batches of a product were manufactured in a 12-month review period. This ensures that a more extensive set of data is used to assess the consistency of the process. In cases where a larger number of batches of a product is manufactured in a 12-month review period, it can also be useful to include trending data from the previous product quality review.

In cases where no batches of a product were manufactured during the 12-month review period, the product quality review should still be performed; this should address at least the following: stability results, returns, complaints, recalls, relevant deviations (including those arising from qualification and validation activities) and regulatory background (e.g. marketing authorisation variations submitted, granted or refused, including those for third country (export only) dossiers, and any relevant post-marketing commitments). A review of the last product quality review should also be conducted.

Review timeframes can be appropriately adjusted based upon manufacturing and campaign duration, with adequate justification. The timeframe criteria should be established in a procedure. The trending performed in the review can include results gathered from the previous period to ensure its robustness.

Eudralex Vol. 4 GMP Chapter 4, Annex 11 and 22

- In light of the rapid advancement of digital technologies and the implementation of AI systems in pharmaceutical manufacturing, the update of Good Manufacturing Practice (GMP) guidelines is essential to ensure that they continue to provide clear, practical and relevant guidance for manufacturers and national competent authorities.
- The revision of GMP Annex 11 and Chapter 4, along with the introduction of a dedicated Annex 22 on Artificial Intelligence aim at supporting innovation in the manufacturing of medicines and ensuring regulatory harmonisation.

Eudralex Vol. 4 GMP Chapter 4 «Documentation»

- The term «Risk» appears 54 times in the proposed text (it is not mentioned in the original text).

RISK MANAGEMENT

4.19. The regulated user should adopt a risk-based approach in documentation throughout the entire lifecycle of data, regardless of the technology, hybrid solution or service used and should demonstrate an understanding for data criticality, data risk and data quality.

4.20. Controls over the data lifecycle should be established which are commensurate with the principles of quality risk management. The depth of data governance and risk management activities should be justified and commensurate with the risks to product quality and patient safety.

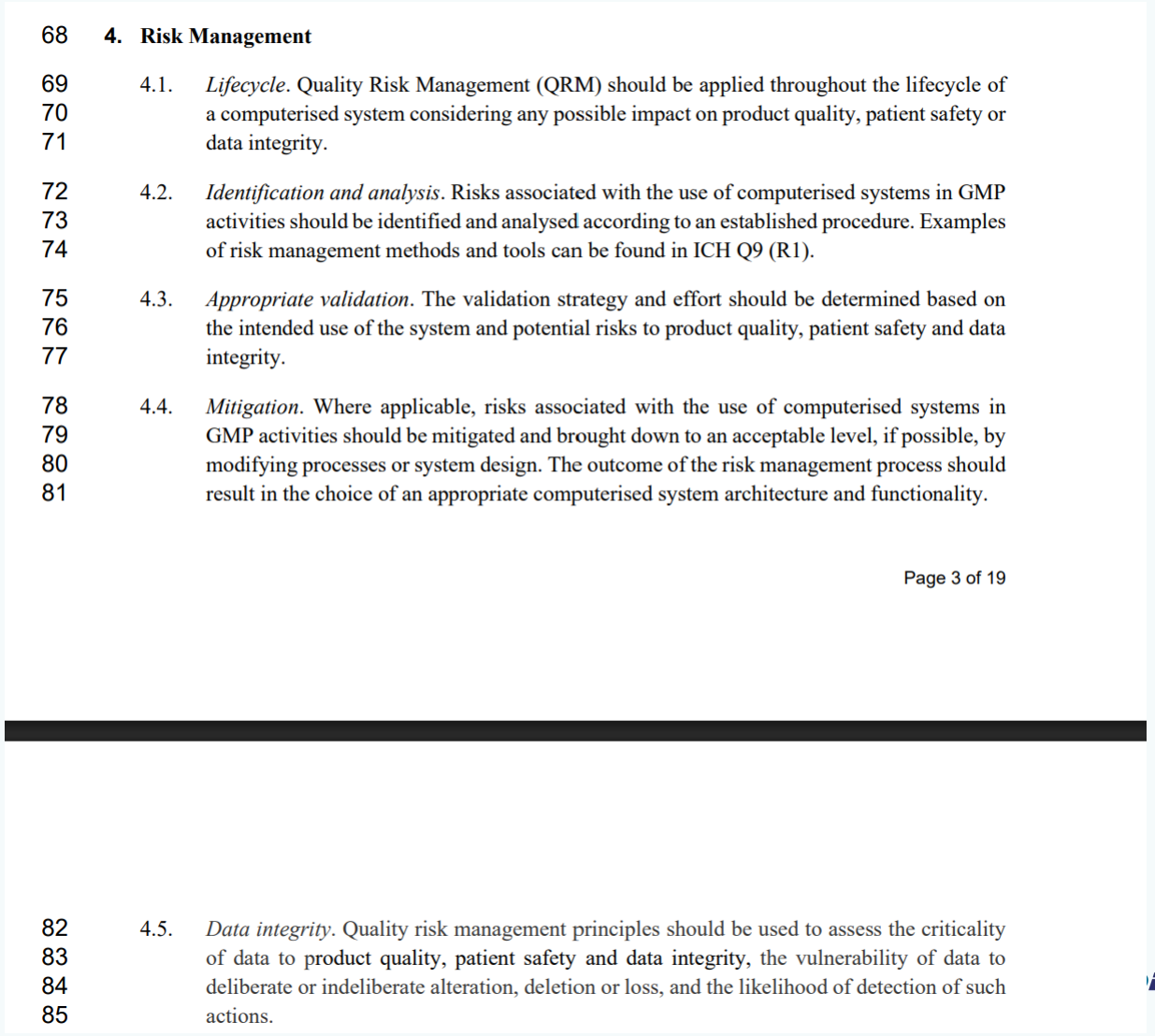
4.21. Decisions on the extent of measures to ensure data integrity should be based on a documented rationale and documented risk assessment taking into consideration data criticality and data risk.

4.22. Irrespective of processes used to generate electronic data, they must be included in the requirements for the qualification or validation of the relevant computerised systems according to Annex 11.

Data Risk Management	An activity to be applied throughout the lifecycle of data considering the need to ensure data integrity. Risk management consists of risk identification, risk assessment, risk mitigation and risk control. Risk management should link to other relevant procedures (e.g. configuration and change management, management processes for data, business risks, etc.).
Data Risk Assessment	The process of evaluating the risks associated with the regulated user's data. It ensures an efficient and effective approach to data integrity by considering the vulnerability of data to involuntary or deliberate alteration resulting in risk-based control measures.

Eudralex Vol. 4 GMP Annex 11 «Computerised Systems»

- The term «Risk» appears 37 times in the proposed text while in the old it is repeated 13 times.



4. Risk Management

4.1. *Lifecycle*. Quality Risk Management (QRM) should be applied throughout the lifecycle of a computerised system considering any possible impact on product quality, patient safety or data integrity.

4.2. *Identification and analysis*. Risks associated with the use of computerised systems in GMP activities should be identified and analysed according to an established procedure. Examples of risk management methods and tools can be found in ICH Q9 (R1).

4.3. *Appropriate validation*. The validation strategy and effort should be determined based on the intended use of the system and potential risks to product quality, patient safety and data integrity.

4.4. *Mitigation*. Where applicable, risks associated with the use of computerised systems in GMP activities should be mitigated and brought down to an acceptable level, if possible, by modifying processes or system design. The outcome of the risk management process should result in the choice of an appropriate computerised system architecture and functionality.

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4.5. *Data integrity*. Quality risk management principles should be used to assess the criticality of data to **product quality, patient safety and data integrity**, the vulnerability of data to deliberate or indeliberate alteration, deletion or loss, and the likelihood of detection of such actions.

Eudralex Vol. 4 GMP Annex 15 «Qualification and validation»

EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

PIC/S
PHARMACEUTICAL INSPECTION CONVENTION
PHARMACEUTICAL INSPECTION CO- OPERATION SCHEME

19 January 2026
EMA/INS/GMP/20217/2026
GMP/GDP Inspectors Working Group (GMP/GDP IWG)

Concept paper on the revision of the guidelines on Good Manufacturing Practice for medicinal products - Annex 15 - Qualification and Validation

Agreed by EMA GMP/GDP IWG	30 November 2025
Agreed by PIC/S	14 January 2026
Start of public consultation	9 February 2026
End of consultation (deadline for comments)	9 April 2026

The proposed guideline will replace:

- Eudralex Volume 4: Annex 15 Qualification and validation

63 The proposal will also include targeted revisions of the text to consider the ICH guideline Q9 (R1) on
64 quality risk management.

65 • The use of QRM in the design and validation/qualification of monitoring systems will be underlined
66 in the general section. Guidance on QRM approach will be complemented with the provision for risk
67 review activities to support validation and qualification in Annex 15. This will link with the guidance
68 provided in chapter 2 of EudraLex Volume 4, Part II.

69 • Annex 15 will also provide emphasis on QRM in the context of traditional process.

70 Other relevant topics and related changes may be considered by the drafting group during the revision
71 process, and will consult GMDP IWG, PIC/S in case required.

Workshop overview

Agenda overview

10:10 – 10:40	The new «era» for risk-based thinking and risk intelligence
10:40 - 11:10	New ICH Q1: Product Intelligence for an Innovative Approach to Stability
11:10 – 11:35	ICH Q3E: integrated risk-based approach for E&L evaluation
11:35 – 12:00	Data as a Compass: Statistical Analysis for Risk Management
12:00 – 12:25	From theory to practice: from stability study management up to data analysis
12:25 – 12:30	Workshop Conclusion and Question time

Thanks for listening

The new «era» for risk-based thinking and risk intelligence

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for better process

Any questions?

Do you need any information?

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