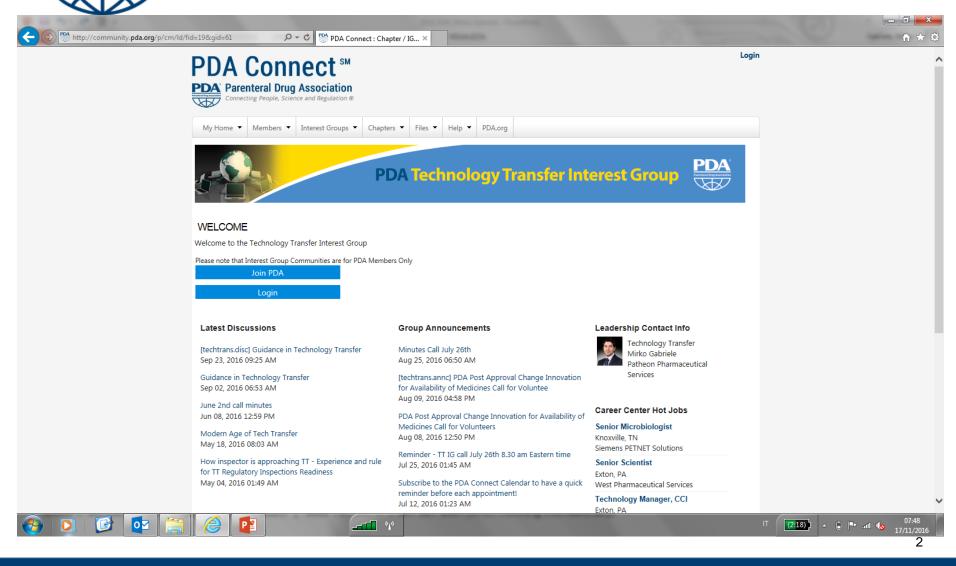


Technology Transfer

Risk Management in TT







Why Join this training





Global Rx sales by 2020



Global pharma and biotech R&D spend by 2020



Shrink in number of Pharma players due to M&A in the last 20 years

TT IS AND WILL BECOME A MORE CRITICAL BUSINESS NEED,
A "BEST TO BEST DEAL" WITH CUSTOMERS, TOP PLAYERS LOOKING FOR CDMO
TOP PLAYERS



Why Join this training

- Incredible increase of number of Technology Transfer projects (TTP) in the pharmaceutical environment, both internal & external and consequent increase of attention on Technology Transfer (TT) handling by Authorities;
- Project complexity is growing day by day;
- **Risks of failure** is always high;
- Quality Risk Management (QRM) & Project Management (PM)
 skills and knowledge are fundamental for success!





- Meet new people
- Networking
- Share experience on TT
- Benchmarking on TT organization, Approaches
- Understand opportunity for improvements



What about you?



What is your expectation?



Technology Transfer – definition and main principles



Terminology

Receiving Unit (RU)

The involved disciplines at an organization where a designated product, process or method is expected to be transferred.

Risk Management (RM)

Risk is combination of severity of harm and probability of occurrence (ICH Q9).

Applicable to Technology Transfer Projects – harm is event that could delay/stop a project

Comparability

The demonstration that the quality attributes are highly similar and that the existing knowledge is sufficiently predictive to ensure that any differences in quality attributes have no adverse impact upon safety or efficacy of the drug product (ICH Q5E).

Technology Transfer (TT)

The transfer of product and process knowledge between development and manufacturing, and within or between manufacturing sites to achieve product realization (ICH Q10).

Technology Transfer Project (TTP) is a set of planned and controlled actions based on well-defined acceptance criteria needed to transfer a technology from a sending unit (SU) to a receiving unit (RU).

Sending Unit (SU)

The involved disciplines at an organization from where a designated product, process or method is expected to be transferred.

8



A process for conceiving and implementing a new/novel application for an existing technology (Reisman, 1989)

The technology transfer consists of actions takento realize the quality as designed during the manufacture (*NIHS*, 2005)

A logical procedure that controls the transfer of an established process together with its documentation and professional expertise to a site capable of reproducing the process and its support functions to a predetermined level of performance (WHO Guideline on transfer technology, 2008)



The Technology Transfer Project (TTP) is defined as a set of planned and controlled actions, based on well-defined acceptance criteria needed to transfer a technology from a sending unit (SU) to a receiving unit (RU).

The Technology Transfer implies four main topics:

- Technical knowledge
- Documentation management
- Project management
- Personnel training and skills

PDA – PMCO Program – Technical Report N.65



The Technology Transfer Project (TTP) is defined as a set of planned and controlled actions, based on well-defined acceptance criteria needed to transfer a technology from a sending unit (SU) to a receiving unit (RU).

Technology = Drug

Technology Transfer Projects must have product quality, product safety and process performance as primary objectives.

Good Transfer
Practice



Good, Reproducible, Safe and Effective Manufacturing Practice



Good & Safe Product delivered to the Patient



The Technology Transfer Project (TTP) is defined as a set of planned and controlled actions, based on well-defined acceptance criteria needed to transfer a technology from a sending unit (SU) to a receiving unit (RU).

<u>Scope</u> of the project must be clearly stated and agreed upon within the team and a structured plan needs to be developed.

Project is a sum of non-repetitive activities which are:

- addressed to a particular goal
- have to be performed in a defined time range
- employ defined resources
- and are managed by a team.



The Technology Transfer Project (TTP) is defined as a set of planned and controlled actions, based on well-defined acceptance criteria needed to transfer a technology from a sending unit (SU) to a receiving unit (RU).

Two main Risk Categories in Technology Transfer:

- Project Risks, associated with project management and people handling
- *Process Risks*, associated with technical issue during process execution

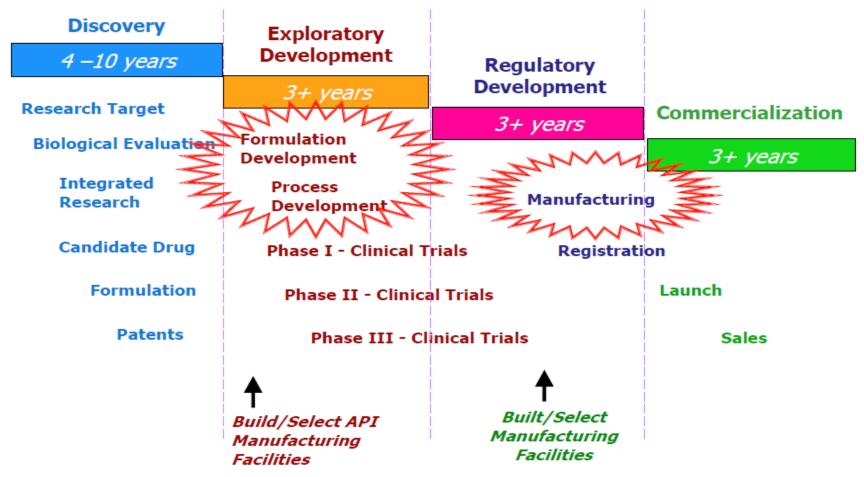


Technology Transfer – When ?



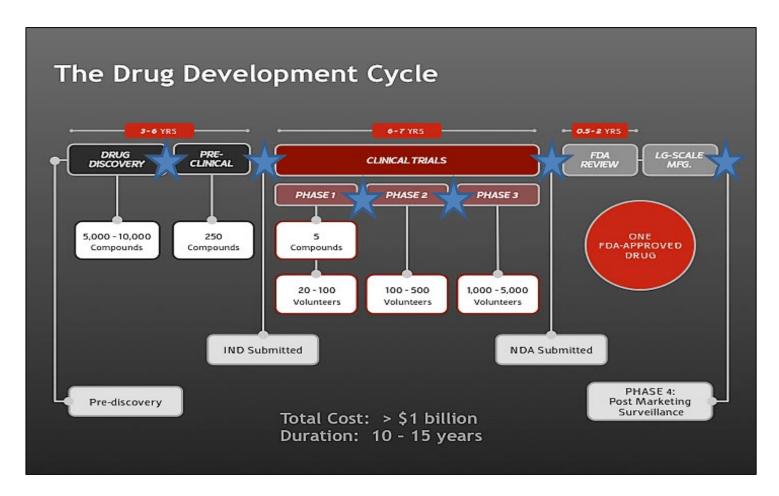
Technology Transfer – When?

Stages in the Development of a New Medicine





Technology Transfer – When?



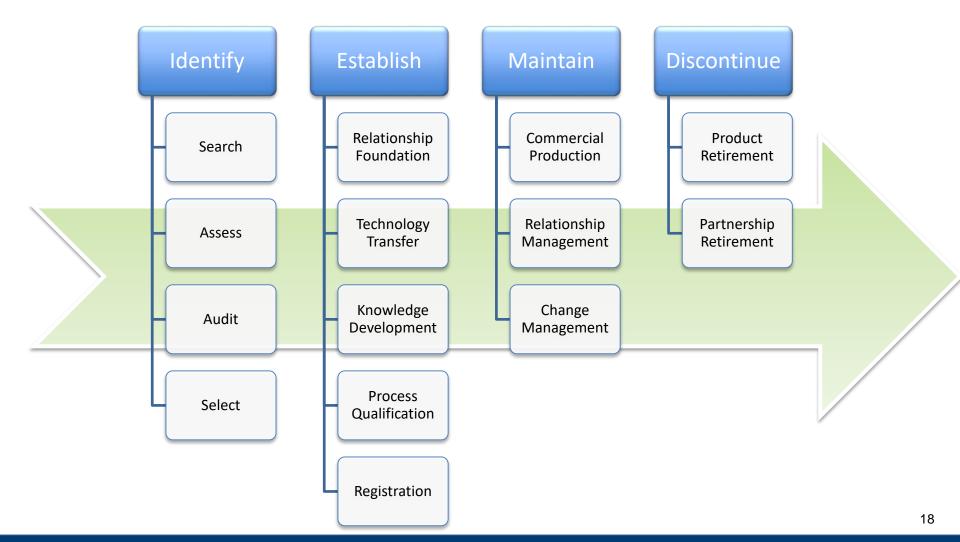


Risk of Selection Partner!





Technology Transfer – When?





Technology Transfer – When?

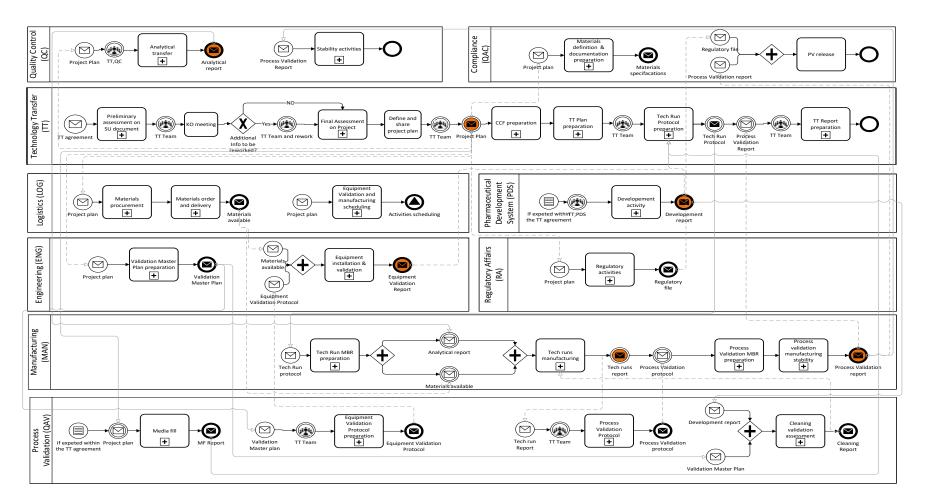
Different pharmaceutical Technology Transfer Project contexts can be managed; each with specific peculiarities; assuming the technology to be transferred is the drug manufacturing process, several possibilities arise:

- •Development to clinical phase TTP
- Clinical Phase to Commercialization TTP
- Commercial TTP
- •Intra-company site to site TTP
- •Inter-company site to site TTP



Technology Transfer - Standard Project description







5 main steps!



1. Planning

- a. Definition of Project Scope and Rationale and the overall project plan
- b. Technology and Knowledge clearly stated
- c. Delvierables defined
- d. Control philosophy agreed
- e. Risks evaluated and mitigation plan defined



5 main steps!



2. Process Readiness

- a. Control and Achieve the readiness set for the poject
- b. Each TT phase and milestones has its own readiness
- c. Stage/Gate step along the project exeution
- d. Process changes tracking and handling
- e. Training and expertise challenge

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5 main steps!



3. Implementation and Qualification

- a. Facility modification
- b. Equipment installation and modification
- c. Analytical transfer
- d. Cleaning and environmental monitoring
- e. TT batches
- f. Process Validation



5 main steps!



4. Licensing & Manufacturing

- a. Regulatory submission
- b. Monitoring of the manufacturing batches



5 main steps!



5. Project Closure

- a. Continuous improvement
- b. Lesson learned



3.4.2 Multidisciplinary Technology Transfer Project Team

Each pharmaceutical TTP requires the involvement of a well-trained, multidisciplinary team at both the SU and RU. The team needs such soft skills as leadership, effective communication, and pharmaceutical market access principles. The team also needs the following technical proficiencies to drive the team toward a positive outcome:

- Quality assurance
- Quality control
- Manufacturing
- Engineering

- Finance
- Maintenance
- Environment, health, and safety
- · Research and development
- Regulatory affairs
- Legal issues
- Project management

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The technology transfer protocol must establish the context for the TTP, including internal and external contextual factors and which risk-management tools to use. The external context might include competitive, financial, regulatory, legal, environmental, and cultural aspects. The internal context can involve company policies and procedures, systems, operational objectives, personnel training and knowledge, available resources, and culture.

All personnel with management roles in the transfer, including the two team leaders, should agree to and sign the project plan. A gate review by senior leadership (or **sponsor**) is used to make visible the plans and risks and provides approval to move to the next stage. In same cases project committee, which has a mainly consultant role, could be useful for the success of the project.



Take Away

- Multidisciplinary Context
- Be always focus on Patient as this is our final «Client»
- Dynamic and challenging environemnt
- Two main Risks categories to be considered



Technology Transfer – Project Risk ans Social Intelligence



The Technology Transfer Project (TTP) is defined as a set of planned and controlled actions, based on well-defined acceptance criteria needed to transfer a technology from a sending unit (SU) to a receiving unit (RU).



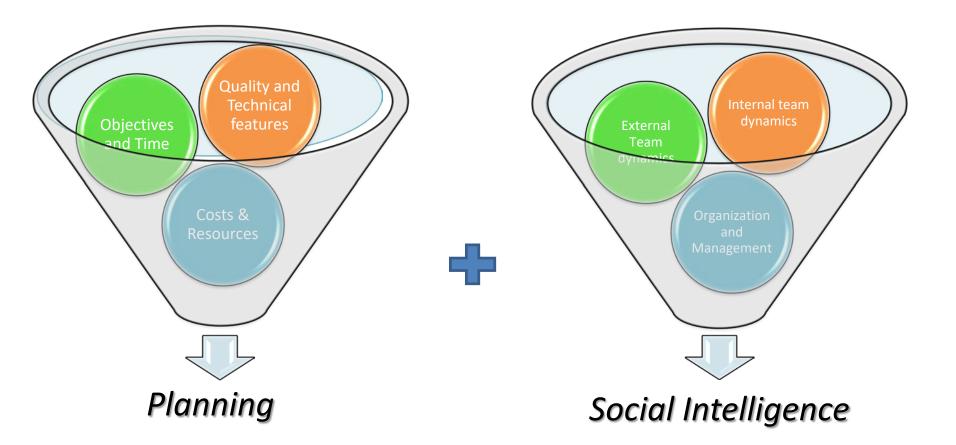
Which are the main Project risks?



- 2. Lack of communication
- 3. Lack of escalation process
- 4. Wrong extimation of time/resources/costs
- 5. Lack of engagement of Team members
- 6. Lack of performance monitoring during execution





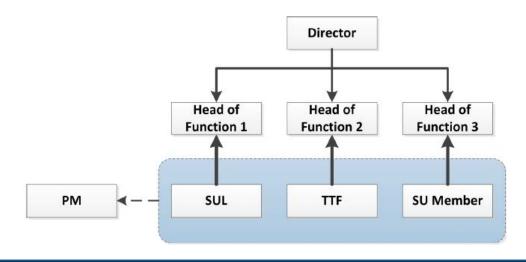




An organizational model that identifies the *people or groups responsible for each task* must be developed and identify which matters are subject to risk-based decisions.

Two main organizational model are seen in the pharma environemnt: light matrix and hard functional

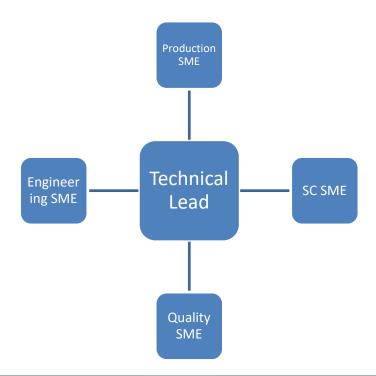
Often a **light matrix approach** is preferred. The hierarchical relationship between a project figure (such as an SU leader, technology transfer department, or SU staff member) is maintained in a priority way (bold arrow). This organizational model minimizes the impact of the transfer activities on the routine activities of the units involved in the transfer





In a hard functional approach, a «Business Unit» is created around the technology transfer needs. Main SMEs report directly to the Technical Lead with a «silos» approach.

Typical of small companies with few TTs per year, it seems to be the best way to provide hard control of well defined and specific activities in a routine and standardized environment.





Each team in the RU and SU should be coordinated by a **team leader** who is the "owner" of the technology project and is responsible for implementing the technology at the RU or SU (e.g., manufacturing in the case of transfer of an industrial process).

The SU and RU technology team leaders should regularly update the project manager on the progress of the activities, budget use, potential technical or economic issues, and proposed corrective actions.



How to reduce Project Risk...







The success of a Technology Transfer is largely related to the **communication** skills and relationship of the Technology Transfer **team** members.

- Open communication between team members
- Effective and timely communication
- Direct communication between subject matter experts

The Technology Transfer leader facilitates meetings and communication between teams



- 1) Weekly Technical Call
- 2) Weekly Project Management Call
- 3) Monthly Stirring Committee
- 4) Business Review meetings



Cultural / organizational differences to be considered and assessed!





#	Meeting	Attendees	Frequency	Tentative Duration (min)	Purpose <u>▼</u>	Tool	Deliverables 🔻
1	Intra Company alignment	SU Leader RU Leader	Weekly/Biweekly based on project step	30	Alignment between Receiving Units and Sending Units in terms of evaluation/plans/actions	Project Dashboard	Meeting Minutes
2	Project Meeting	RU Leaders SU PM (or equivalent role)	Weekly	30	Discussion between PMs on Project status and execution, performance and communication between teams, main risks to be mitigated to avoid delay or stops	Project Dashboard Project Plan Risk Register	Meeting Minutes
3	Technical Meeting	RU Leader SU PM (or equivalent role) SMEs from parties based on agenda	Weekly	60	Detailed technical discussion on project tasks or issues	Technical Documents Project Plan Risk Register Project Dashboard	Meeting Minutes Risk Register updated Project Dashboard updated
4	Internal Sponsor meetings	SU Leader RU Leader RUSponsor	Biweekly	30	Update the project sponsor on Project status , SU relationship, RUteam performance and needs, risks and mitigation plan, issues and related action on going for resolution	Project Dashboard Risk Register	N/A
5	Project Sponsors Meetings	RUSponsor SU Sponsor RU Leader SU PM (or equivalent role)	Monthly	30	Update the SU/RUSponsors on the Project status, Relationship, Team performances, risks and needs	Project Dashboard Risk Register	Minutes















- TTPMs are the "General Manager of the project" for our clients
- Take ownership of project/product opportunities and drive them from early quotation stages to manufacturing and routine supply:
 - Relationship management Key window for the sending unit into the receiving unit
 - Relationship management Key and entrusted by all the members of the TT team
 - Project / Opportunity Cost Evaluation and Budget management
 - Contract Negotiation and ongoing MSA maintenance
 - Project Management leading all company functions, Operations, Quality, Finance, Quotation group, Business development and Account executives.
 - Financial Reporting revenue forecasting

The TTPMs have a strong site technical knowledge linked with business acumen



Roles and Responsibilities....Clear Definition in the team, avoiding conflicts and putting in place a clear efficient way of executing the TT

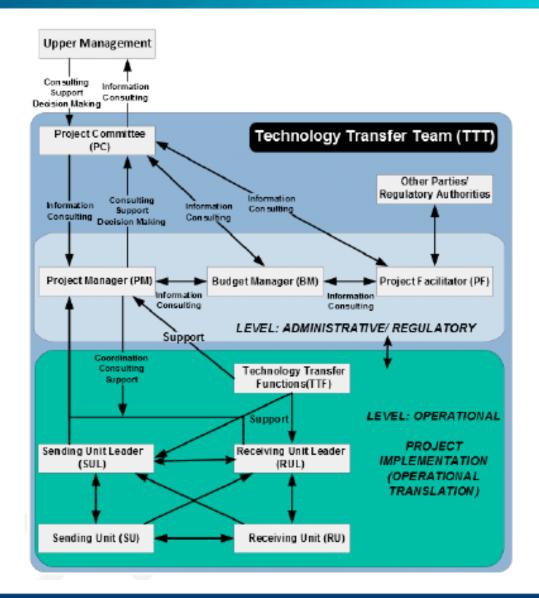
Project Stage	SU	RU		
Planning	Identify relevant documents	Implement SU-provided documents		
Process	Transfer documents to RU	Organize validation and implementation plans		
Readiness	Review document implementation at RU	Validate and implement the technology being transferred		
	Train RU personnel	Train personnel		
Implementation and Qualification	Support RU during validation, start up, and follow-up	Execute start up, evaluate results		
	Support RU in failure and gaps evaluation after startup phase	Solve any failure or deviations occurred during startup phase		
	Support RU during improvements identification and implementation	Identify potential improvements after start up data evaluation		
Closure	Support and sponsor RU in the continuous verification phase after start up	Continuous verification and improvement plan set up		

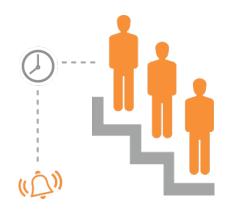


					Project Leader	ship				
Role Project Deliverable (or Activity)	Technology Transfer (TT)	Business Managment (BM)	Quality Control	Qualiy Compliance (QAC)	Logistics (LOG)	Engineering & Equipment Validation (ENG)	Manufacturing (MAN)	Process & Cleaning Validation (QAV)	Regulatory Affairs (RA)	Pharmaceutical Development System (PDS)
			_				_			
Preliminary assessment	A/R	A/R	С	С		С	С	С	С	I/C
Meet the customer and verify information	A/R	A/R	I I	I	I	C/I	I	1	С	I/C
Define and share the project plan	A/R	VC	I	1	1	C/I	I	1	1	1
Change Control Form preparation	A/R	VC	С	R/C	С	1	С	С	С	С
Technology Transfer Plan preparation	A/R	VC	С	С	1	1	C/I	C/I	С	1
Tech run protocol preparation	A/R	VC	С	I/C	ı	ı	C/I	C/R	1	1
Technology Transfer Report preparation	A/R	VC	I	ı	ı	ı	ı	ı	ı	1
Analytical transfer	I/C	1	A/R	I/C	ı	ı	ı	ı	1	1
Stability Activities	I/C	I	A/R	I/C	I	ı	I	I	I/C	1
Materials definition & documentation preparation	I/C	VC	1	A/R	1	I/C	VC	I/C	ı	1
PV release	I/C	VC	ı	A/R	R	I/C	R	I/C	I/C	ı
Materials Procurement	I/C	VC	I		A	VC	1	1		1
Materials Order and delivery	I/C	VC	i	ì	A	VC	î	i		
Equipment validation and manufacturing sheduling	I/C	VC	I	I	R	A/R	I	ı		ı
Validation Master Plan	I/C	1	1	1	1	A	VC	1		1
Equipment Installation and Validation	I/C	i	ı	ı	I/C	A	VC	i	I/C	i
Tech run MBR preparation	I/C	VC	I/C	I/C		1	A	I/C		
Tech run manufacturing	I/C	VC VC	I/C	ı,c	R/C	 	Ä	I/C	i i	
Process Validation MBR preparation	I/C	VC VC	I/C	ı/c	1	i i	Ä	C	i i	i i
Process Validation manufacturing stability	I/C	VC	I/C	I	R/C	i	A	Ī	i	i
Regulatory activities	I/C	ı	I	I	I	1	I	I	A	1
Development activities	VC VC	VC	I	I	I	1	I	I	I/C	A/R
Media FIII	I/C	VC	C/R		R	1	R	A		
Equipment Validation Protocol Preparation	I/C	VC	ı	i	l ï	A	ï	I/C	t i	+ + + + + + + + + + + + + + + + + + +
Process Validation Protocol	I/C	VC	Ċ	i	<u> </u>	I/C	Ċ	A	i i	
Cleaning Validation assessment	I/C	VC	C/R	i		1	c	A		i

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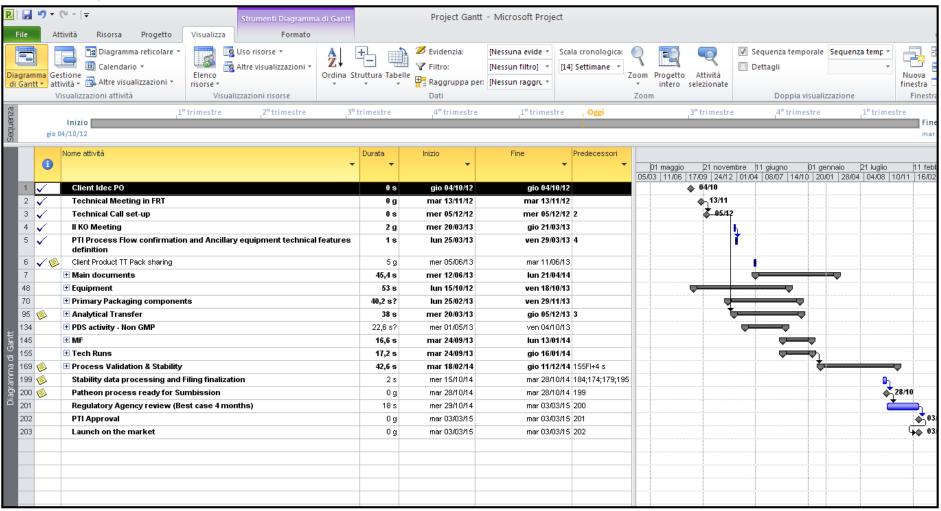


- Project Gantt
- Action List
- Decision List
- Risk Register
- Activities completion tracking

Define scope, plan, execute and track

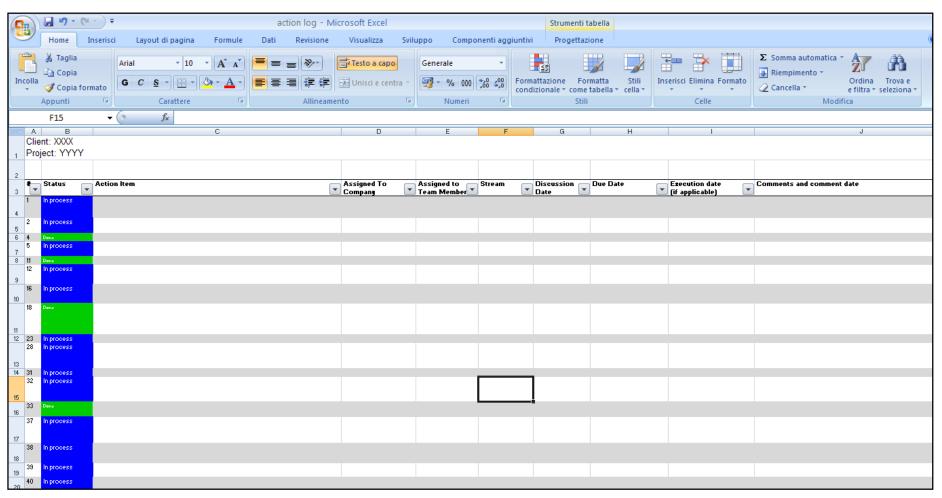




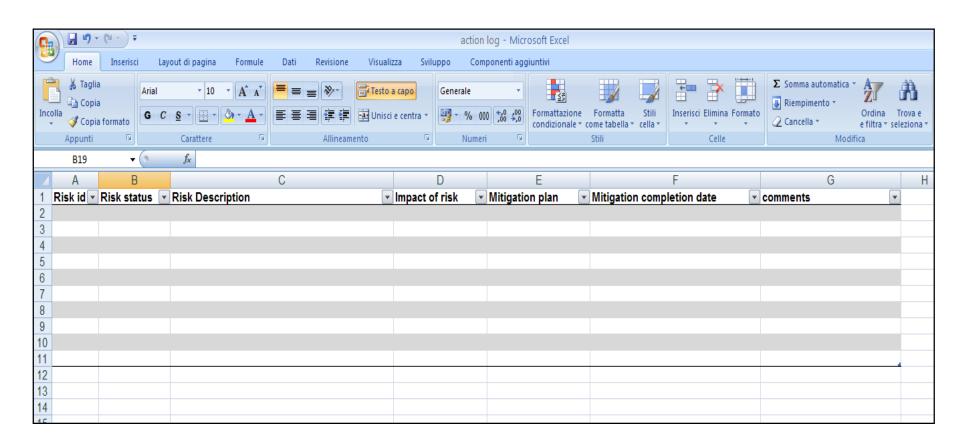




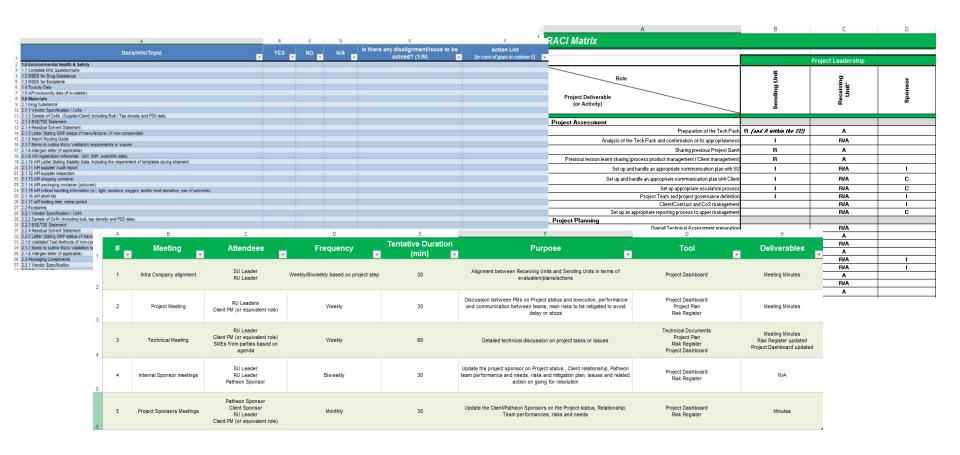














Com	pany Nar	ne					Proj	ects I	(PI - S	iched	ule Ad	dhere	nce			
									KPI i	n percenta	ge %					
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		TT	N/A	100	N/A	0	2 5	0	N/A	N/A	N/A				25	March-17
		Registration	0	100	N/A	N/A	N/A	100	N/A	3 3	N/A				50	January-18
		TT	100	0	0	N/A	3 0	0	N/A	N/A	N/A				14	TBD
		TT	N/A	100	100	0	40	0	N/A	0 0	0				33	November-17
		Development	100	N/A	100	0	50	50	0	N/A	N/A				40	July-18
		TT	N/A	N/A	N/A	N/A	2 50	100	100	N/A	2 50				67	September-19
		TT	N/A	N/A	100	N/A	67	100	100	100	67				83	August-18
		Development	N/A	100	100	100	100	100	100	N/A	N/A				100	December-19
		TT	100	100	100	100	100	100	0	6 7	100				2 75	September-16
		TT	N/A	100	N/A	N/A	I 14	0	0	N/A	100				20	November-17
		TT	N/A	N/A	N/A	N/A	N/A	0 0	0	N/A	N/A				0	December-17
-		TT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				0 0	January-18
		TT	N/A	N/A	100	N/A	2 0	N/A	N/A	N/A	2 5				3 0	March-18
		Com - New API	N/A	100	100	N/A	N/A	N/A	N/A	100	100				100	Commercial
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Green		Over 95%														



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								KPI i	n percenta	ıge %					
Client	Product	Stage	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	ОСТ	NOV	DEC	TOTA
		TT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
		Com - New API	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
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		TT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
		Development	100	N/A	N/A	N/A	N/A	100	N/A	N/A	N/A				100
		TT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
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		Development	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
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<u>1</u>		TT	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				N/A
		Com - New API	N/A	N/A	100	N/A	N/A	N/A	N/A	N/A	N/A				100
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Measurement	Color Code	Range													
Red	•	Less Than 90%													
Yellow	•	90% - 94%													



Technology Transfer – Risk Assessment



Risk

- combination of the probability of occurrence of harm and the severity of that harm

Quality Risk Management

- Quality risk management is a systematic process for the assessment, control, communication and review of risks to the quality of the drug product across the product lifecycle.

Risk reduction

 processes for mitigation or avoidance of quality risk when it exceeds a specified (acceptable) level.

Risk acceptance

- formal decision to accept the residual risk or a passive decision in which residual risks are not specified

Risk communication

- sharing of information about risk and risk management between the decision makers and others







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Welcome to the ICH official website

The International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH) is unique in bringing together the regulatory authorities and pharmaceutical industry of Europe, Japan and the US to discuss scientific and technical aspects of drug registration. Since its inception in 1990, ICH has gradually evolved, to respond to the increasingly global face of drug development, so that the benefits of international harmonisation for better global health can be realised worldwide. ICH's mission is to achieve greater harmonisation to ensure that safe, effective, and high quality medicines are developed and registered in the most resource-efficient manner. Download the ICH 20th Anniversary Publication

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M4: CTD

The agreement to assemble all the Q, S, and E information in a common format (called CTD - Common Technical Document) has revolutionized the regulatory review processes... (more)



ICH Training

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Help to Shape the ICH Guidelines

by responding to one of our consultations. Your contribution will then be considered by the relevant ICH Working Group.

Draft Guidelines
Q&A Documents

Recent News

10 February 2014

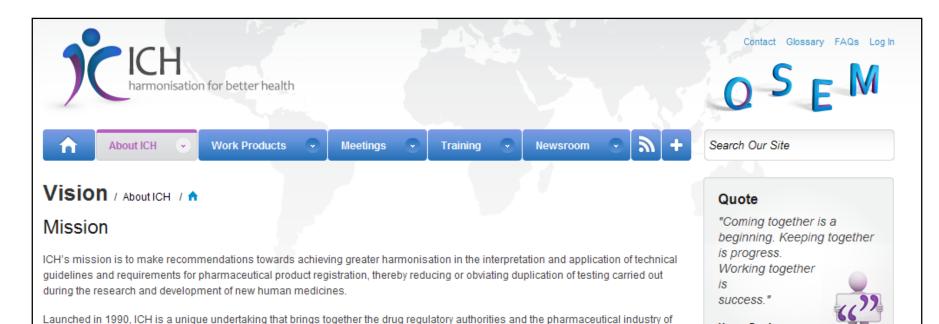
Invitation to Submit an Expression of Interest for the MSSO Tender

ICH is considering a Call for Tender in 2014 for the contract for the MedDRA Maintenance...



Europe, Japan and the United States.

ICH & Risk - http://www.ich.org/



Regulatory harmonisation offers many direct benefits to both regulatory authorities and the pharmaceutical industry with beneficial impact for the protection of public health. Key benefits include: preventing duplication of clinical trials in humans and minimising the use of animal testing without compromising safety and effectiveness; streamlining the regulatory assessment process for new drug applications; and reducing the development times and resources for drug development.

Harmonisation is achieved through the development of ICH Tripartite Guidelines. The Guidelines are developed through a process of scientific consensus with regulatory and industry experts working side-by-side. Key to the success of this process is the commitment of the ICH regulators to implement the final Guidelines.

ICH at a Glance...

Henry Ford

Overview of ICH - Presentation
Overview of ICH - Summary







It is commonly understood that risk is defined as the combination of the probability of occurrence of **harm** and the severity of that harm.

In relation to pharmaceuticals, although there are a variety of stakeholders, including medical practitioners as well as government and industry, the protection of the patient by managing the risk to quality should be considered of prime importance.

It is important to understand that product quality should be maintained throughout the product lifecycle such that the attributes that are important to the quality of the drug (medicinal) product remain consistent with those used in the clinical studies.



Two primary principles of quality risk management are:

• The evaluation of the risk to quality should be based on scientific knowledge and ultimately link to the protection of the patient;

• The level of effort, formality, and documentation of the quality risk management process should be **commensurate** with the level of risk.



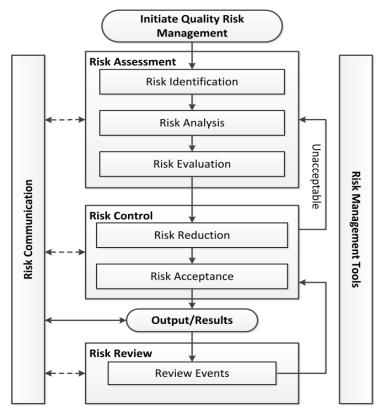
Quality risk management activities are usually, but not always, undertaken by interdisciplinary teams. When teams are formed, they should include experts from the appropriate areas (e.g., quality unit, business development, engineering, regulatory affairs, production operations, sales and marketing, legal, statistics, and clinical) in addition to individuals who are knowledgeable about the quality risk management process.

Decision makers should

- take responsibility for coordinating quality risk management across various functions and departments of their organization and
- ensure that a quality risk management



The quality risk management (QRM) is "a systematic process for the assessment, control, communication and review of risks to the quality of the drug (medicinal) product across the product lifecycle."





Risks of Technology Transfer

- Often, poor attention to its objectives (e.g., too tight or too broad process specifications) destines a TTP for failure. Technology transfer can affect drugs and patients. Consequently, in all technology transfer activities that a project team designs and executes, the team needs to keep in mind the scope of the technology being managed and the potential impact of technology transfer failure.
- Some common risks are:
 - Lack of information
 - Objective that is not clear (or clearly defined) or not properly communicated and/or shared
 - Poor preliminary assessment with lack of changes identification
 - No or poor assessment of the effects of changes to the objective
 - Lack of project management



□ The selection of a risk management approach should be done at the beginning and applied along the TTP. This approach will facilitate decision-making at different points throughout the TTP while ensuring that all activities are performed in a manner that protects patient safety.

□To realize the utmost benefit from QRM, companies must adapt their culture, systems, and procedures. They must shift from a risk-averse to a risk-aware culture by creating procedures and tools that enable individuals to apply benefits from QRM to the TTP



Stage Gate	Strategy	Analytical and Quality Control Testing	Regulatory	Process	Facilities/ Engineering	Risk Management and Components				
1 Planning	Perform preliminary risk a	ssessment prior to beginnir	ng late-phase development	using risk ranking and/or pr	eliminary hazards analysis	approach.				
Process Readiness	Update preliminary risk assessment (transition to PHA)	Update risk assessment (transition to PHA) for SU and RU readiness for AMT	Risk mitigation through SLA and quality agree- ment between SU and RU	Update risk assessment (transition to PHA) for manufacturability of late-phase development process	Update risk assessment (transition to HAZOP) for operating process at manufacturing site	Update risk assessment (transition to PHA) for RMs/ components, including assessment of the impact of any changes in the suppliers or manufacturing sites of the RMs				
3 TTP implementation and Qualification	Review and update risk as Mitigate identified high ris	ssessment/PHA from stage	gate 2 if necessary.							
4	Convert PHA risk assessment from stage gate 3 to FMEA/FMECA risk assessment, including re-evaluation of risk ranking after risk mitigation plan implementation									
Licensure & Manufacturing	Update risk assessment from stage gate 4 for commercial process	Complete risk assess- ment for SU and RU readiness for AMT	Risk mitigation through SLA and quality agree- ment between SU and RU	Update risk assessment for manufacturability of commercial process	Update risk assessment (HAZOP) for operating pro- cess at commercial site	Update risk assessment for RMs/components, in- cluding assessment of the impact of any changes in the suppliers or manufac- turing sites of the RMs				

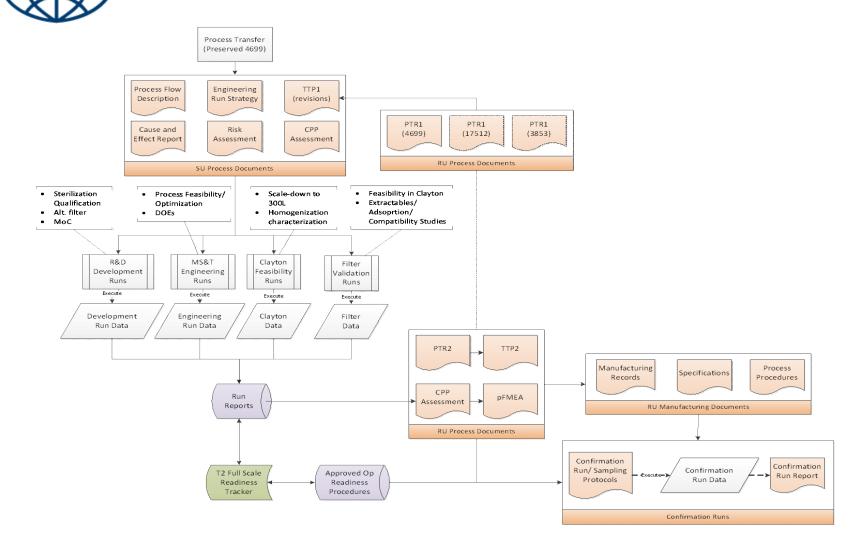


As applied to Technology Transfer (TT), this activity, done at the beginning of the project, can detect the most likely potential causes of technical failures and allow planning for mitigating those risks.

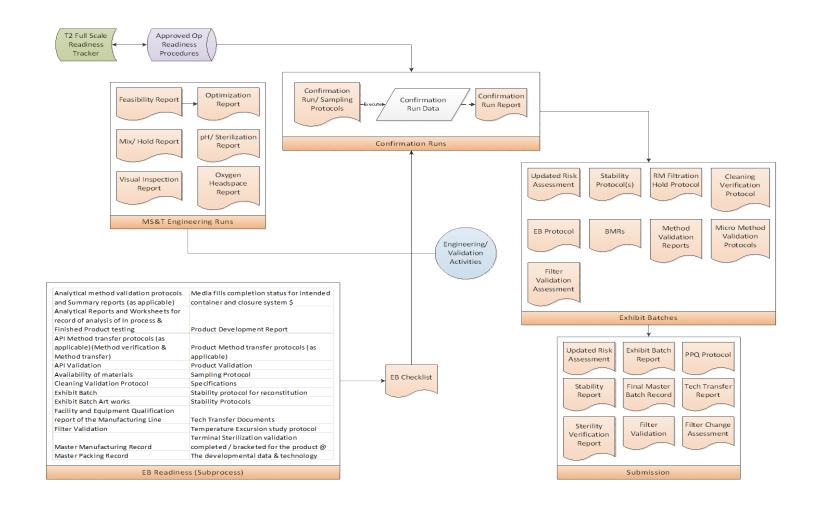
Following ICH Q9, the risk can be estimated based a combination of three main factors:

- •Severity (S)
- •Occurrence (O)
- •Detection (D)

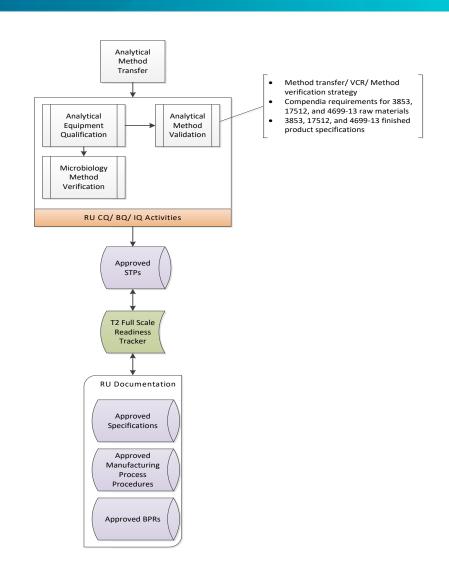




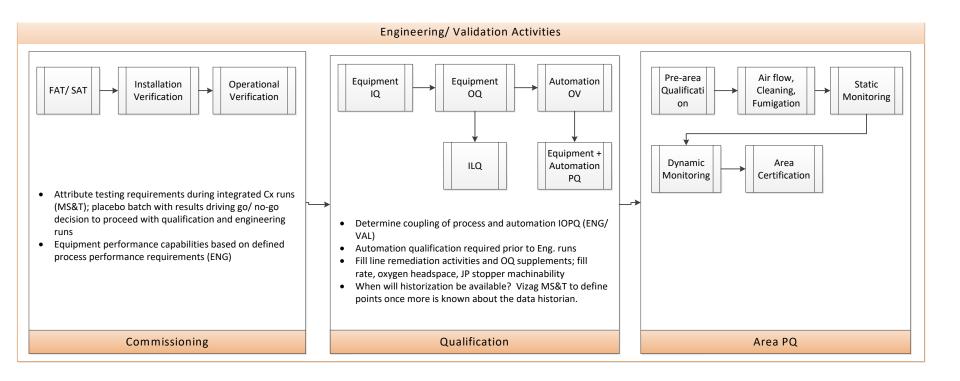














Thanks to John for the flow and the collaboration!

John Wass, CPIP

Over the past decade I have participated in many stages of the product development lifecycle from concept to new market commercialization, and have implemented enterprise quality data management and manufacturing process control systems in support of these product processes

Recently I was engrossed in the technology transfer of a legacy product to an international greenfield facility where a retrospective QbD approach was being employed





Severity considers the potential impact on the quality attributes of the product and hence on patient health.

It can be rate based on the table below

Severity	Risk Classification	Value
No impact on the product's quality attributes or on patient health	Negligible	1
Moderate impact on product's quality attributes and on patient health	Moderate	2
Severe impact on product's quality attributes and on patient health	Critical	3



The occurrence factor is defined as the frequency of occurrence of the event. In a TTP phase, occurrence is based on the combination of the SU knowledge of the product and the RU experience on process.

It can be rate based on the table below

Occurence	Risk Classification	Value
Highly improbable or impossible that the negative event occur	Remote	1
Some possibility that the negative event will occur	Medium	2
Highly probable or certain that the negative event will occur	High	3



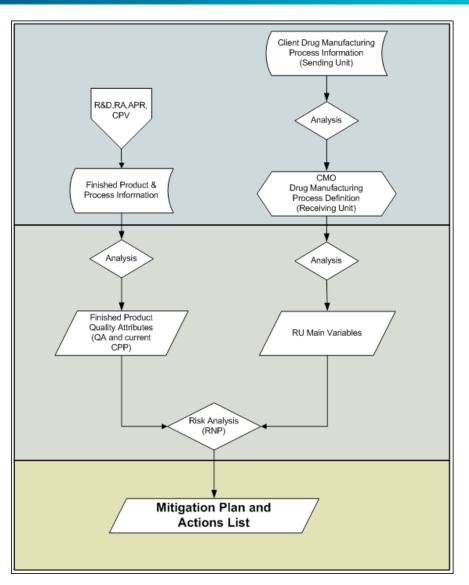
Technology Transfer – Risk Management

The detection factor is defined as the probability of detecting the events if they occur, based on the control system in place.

It can be rate based on the table below

Probability	Risk Classification	Value
Highly probable or certain that the negative event will be detected by the control system in place	Remote	1
Some possibility that the negative event will be not detected by the control system in place	Medium	2
Highly improbable or impossible that the negative event will be detected by the control system in place	High	3





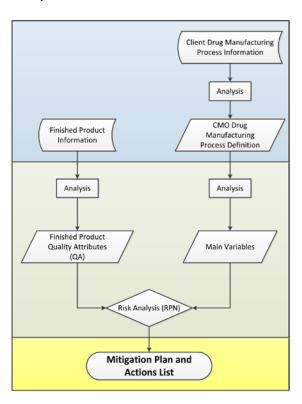
Data collection

Data evaluation

Data use



Our Risk Assessment and Mitigation approach is based on several Source of information, linked to create a TT Starting Story



Source 1 - Definition of the Quality Attributes of the product (SU -> RU) (examples below)

List of main items considered for the evaluation	Relative Variables					
Process	Mixing Holding Compounding Grade C filtration Grade A filtration	Filling Stoppering Crimping Solution transfer Steam terminal sterilization	Identification Whapping Visual inspection Secondary packaging Line cleaning			
Primary packaging and GMP materials	Stoppers Vials Seals	Filters Disposable tubes Disposable bag	Fixed tube Gasket			
API and excipient attributes	API pH API appearance	API density API osmolality	Excipient attributes			

Source 2 – Definition of the Process Variable (RU) (examples below)

	Quality Attribute);
Appearance	pН	Volume in container
Identity	Density 20°C	Cosmetic appearance
Assay	Osmolality	Sterility
Impurity	Particle matter	Endotoxins



Risk Assessment and Mitigation Approach:

- > is part of part of Company DNA, therefore application is a must for all our TTs and during the whole project lifecycle;
- > Has to be in line with the current regulatory guidance, GMP and based on scientific sound
- > Has to be managed by appropriate flexible, robust and efficient tools
- ➤ Is a multifactorial exercise that takes in considerations internal and external variables of the project/process/product/lines
- > Provides a clear path forward starting with QbD and development (where necessary) and ending with a reproducible, efficient and in quality market supply

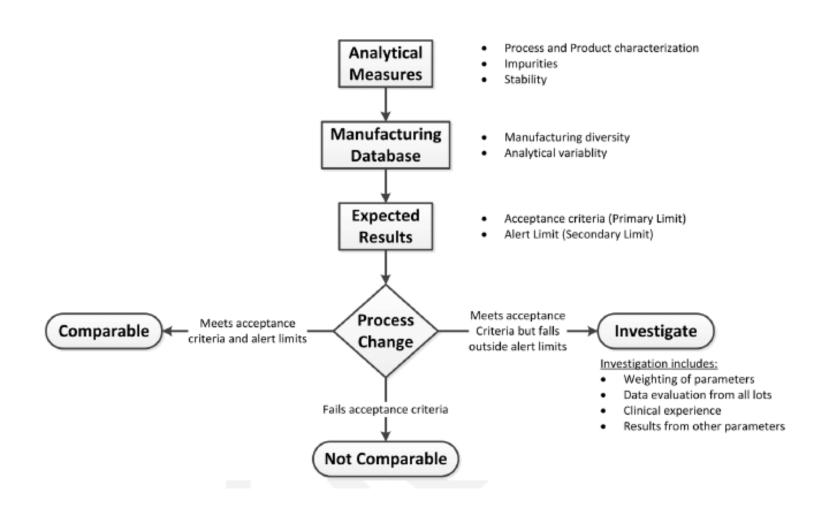
Analysis				Risk	Priority Nu	mber Evalu	ation	Mitigation Plan
Item	Variable	QA Impacted	Potential criticality/cause of lack of quality attribute description	Severity	Occurrence	Detection	RPN	Consideration/Action
		Impurity	An impurity from the stopper can modify the solution chemical profile	3	2	3	18	The stopper components have been chosen by the SU during the development studies.
		impunty	The coating material can modify the chemi- cal solution profile	3	2	3	18	The same stoppers will be used to guarantee no anomalous interaction with stopper coating and
		Appearance	Substances released from the stopper or from the coating can induce flocculation or coagulation events in the solution	3	2	1	6	rubber. Stability data were collected by the SU; no inter- action issues were reported to RU.
	Stoppers	Аррешансе	Substances released from the stopper or from the coating can modify the appearance of the solution	3	2	1	6	
Primary Packaging & GMP		Sterility	The bioburden of the stopper can impact the effectiveness of currently used and validated sterility cycles	3	1	3	9	A risk assessment will be done to compare the several stoppers currently used in RIU with the SU stoppers, to evaluate the possibility to use a sterilization cycle already validated. In the case in which no comparable stoppers are found, a new stopper sterilization cycle will be validated.
materials		Particle Matter	Release from the stopper may impact the particle matter profile of the solution	3	2	3	18	A final 100% visual inspection will be done. Vials with a particle matter defect will be rejected.
			Impurities released from the glass can impact the solution profile	3	2	3	18	Type I glass, USP/EP grade will be used. The validation batches produced will be analyzed via
		Impurity	Leachables and extractables from the glass can modify the chemical profile of the solution	3	2	3	18	stability study. All release tests will be repeated regularly during the stability program to confirm no anomalous changes to the system profile.
	Vials	Appearance	Leachables, extractables, and ions can induce flocculation or coagulation of the system	3	2	1	6	Tilo anomaious changes to the system prome.
		Cosmetic Appearance	Vials of finished product can be rejected for cosmetic defects	2	2	1	4	No further actions are needed. Incoming statistical chacks will be done on each lot of valse prior to use. An agreement with the supplier is in place that defines appropriate A0Ls for each defect. These A0Ls are in line with the cosmetic requirements received by the SU.

Analysis				Risk	Priority Nu	mbor Evalua	ttion	Mitigation Plan
tem	Variable	QA Impacted	Potential criticality/cause of lack of quality attribute description	Severity	Occurrence	Detection	RPN	Consideration/Action
		pH	Dissolution time insufficient for complete dissolution and an homogenous system	3	3	1	9	During the Performance Qualification, the mixing device of the tank used in the RU will be challenged
		Osmolality	Dissolution speed insufficient for complete dissolution and an homogenous system	3	3	1	9	Mixing studies will be agreed with the SU and performed during the engineering batch.
			Mixing system not appropriate to guarantee uniform batch mixing					The User Requirements of the RU tank have properly defined the mixing needs based on the characteristics of the colloidal system.
	Appearance		3	3	3	22	The initial evaluation and information sharing between SU, RU and the disposable technology Supplier have identified the appropriate mixing device.	
								The PC challenge of the mixing system will in- clude appropriate texts suggested by the supplier owner of the technology
_ Mixing	Density	Temperature of the system out of range specified by the SU	2	1	1.	2	No further action needed. The colloidal system is not sensitive to temperature. The RU WFI loop cooling and temperature control system will guarantee a 15-2°C range.	
Process	Process Compounding	Density	Sampling mode device impact on the analysis results	3	2	7	12	The sampling system will be made of pharmaceutical grade glass. The SU have collected data on compatibility and the solution is declared compatible with glass devices.
		Storiity	Preparation time impact on bioburden level of the final compounded solution	3	2	2	12	Validation activities will include hold time chal- lunges according to a dedicated protocol. Chemical characteristics and microbiological at- tributes of the solution will be analyzed.
			Particle release from disposable hoses may impact the particulate matter profile			1		Use Silicon, Pt-cured, disposable hose certified for pharmaceutical use for solution transfer.
	Particulate matter	3	2	3	10.	To address particle release from the hoses used in Grade C, fifter the solution 2 times before filling (0.46 um + 0.22/0.2 um in grade C area and 0.22/0.2 um in grade A area).		
								Regarding the particle release from the hoses used on the filling machine, a final 100% visual inspection will be done. Visits with a particle matter defect will be rejected.



Analysis				Risk Priority Number Evaluation				Mitigation Plan	
Item	Variable	QA Impacted	Potential criticality/cause of lack of quality attribute description	Severity	Occurrence	Detection	RPN	Consideration / Action	
		pН	Dissolution speed is insufficient for complete dissolution and a homogenous system.	3	3	1	9	During the performance qualification, the mixing device of the tank used in the RU will be challenged.	
		Osmolality	Dissolution speed is insufficient for complete dissolution and a homogenous system.	3	3	1	9	Mixing studies will be agreed on by the SU and performed during the engineering batch.	
		Appearance	Mixing system is not appropriate to guarantee uniform batch mixing	3	3	3	27	The user requirements of the RU tank have properly defined the mixing needs based on the characteristics of the colloidal system. The initial evaluation and information sharing between SU, RU, and the disposable technology Supplier have identified the appropriate mixing device. The PQ challenge of the mixing system will include appropriate tests suggested by the supplier/owner of the technology	
		Density	D 15-	Temperature of the system is outside the range specified by the SU	2	1	1	2	No further action needed. The colloidal system is not sensitive to temperature. The RU WFI loop cooling and temperature control system viguarantee a 15-25°C range.
Process	Mixing and compounding		Sampling mode device can affect the analysis	3	2	2	12	The sampling system will be made of pharmaceutical-grade glass. The SU has collected data on compatibility, and the solution is declared compatible with glass devices.	
		Sterility	Preparation time can affect the bioburden level of the final compounded solution	3	2	2	12	Validation activities will include hold time challenges according to a dedicated protocol. Chemical characteristics and microbiological attributes of the solution w be analyzed.	
		Particulate matter	Particles release from disposable hoses may impact the particulate matter profile	3	2	3	18	Use Silicon, platinum-cured, disposable hose certified for pharmaceutica use for solution transfer. To address particle release from the hoses used in grade C, filter the solution three times before filling (0.45 um + 0.22/0.2 um in grade C are and 0.22/0.2 um in grade A area). Regarding the particle release from the hoses used on the filling machine a final 100% visual inspection will be done. Vials with a particle matter defect will be rejected.	
			Mixing system shedding may impact the particulate matter profile	3	2	3	18	Supplier has provided leachable/ extractable documentation and certifications. Compatibility studies to be conducted with specified analytical methods with the supplier.	







Technology Transfer Protocol involves:

- Procedure in place to handle documentation exchange, review and evaluation
 - within unit and between S & R units
- Reviewers list and approvers list
- QA/RA overall super-visioning of the document and its contents





Knowledge management and transfer are key requirements of the TTP for preserving product quality and process performance after technology transfer.

Because of the large amount of multidisciplinary information collected, evaluated, and elaborated during the TTP, a systematic approach to acquiring, analyzing, storing, and disseminating information related to the technology should be considered and customized on the basis of the team and the project.



- Batch records & Bill of materials
- Item specifications and justifications
- Summary of stability
- Lists of potential impurities and degradants and typical levels
- Starting materials and material safety data sheets
- Assay-related documents
- Drug master file for active pharmaceutical ingredients (APIs) and excipients
- Qualification of bioburden tests
- Solubility profiles
- Process flow diagram that provides a rationale for the synthesis, route, and form selection; technology selection; equipment;, clinical tests; and product composition
- Vendor qualification (for transfers to contract manufacturing organizations [CMOs])
- Training protocols
- Process validation report and master plan & Cleaning validation protocols and reports
- Project implementation plan & Risk assessments performed for the process or testing.



Technology Transfer Protocol

A roadmap must be designed from the very beginning of the project to ensure comprehensive project management. The SU and RU should jointly develop a TTP plan that will govern the entire project. Critical inputs to the technology transfer plan include a regulatory strategy and a gap analysis

Outputs of this stage include a finalized project plan describing activities, resources, schedule, and project risk assessment.



The Technology Transfer Protocol document should drive the overall process and define the strategic approach by describing at least:

- The manufacturing process being transferred
- Sampling and testing steps
- Roles and responsibilities of the SU and the RU
- RU's equipment and facilities
- A brief description of both sites (SU and RU) that includes gaps and/or differences
- Documentation requirements
- Project schedule, including roles and responsibilities of personnel (a Gantt chart is helpful here)
- Technology transfer tools, including templates
- Risk list and mitigation plan
- Correlations to previous and subsequent tasks

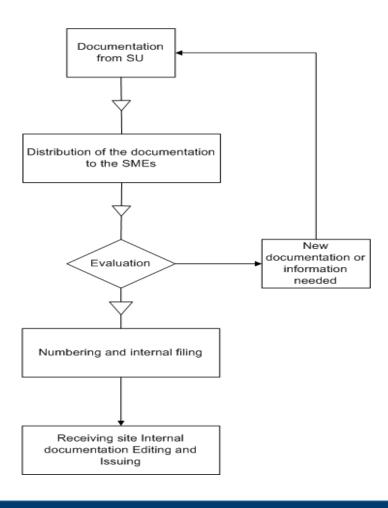


SOP for TT Protocol/report handling

- ☐ Chapter 1. Application area: Which kind of documents are needed
- Chapter 2. *Responsibilities:* Who is responsibile for what
- ☐ Chapter 3. *Documentation flow:*
 - How the documentation is received from the SU
 - ► How it's distributed among the team
 - How it's stored and numbered
- ☐ Chapter 4. *Project identification:* procedure (codes, numbering) ☐ Chapter 4. Project Story
- □ Chapter 5. Project planning tools □ Chapter 5. Project Results
- □ Chapter 6. Project monitoring tools □ Chapter 6. Lesson Learnt and CPV
- □ Chapter 7. Project closure tools □ Chapter 7. Document Closure
- ☐ Chapter 8. Document History ☐ Chapter 8 . Document History
- ☐ Appendix. Template and signature page



Visual Management support





Technology Transfer – day 2



Technology Transfer take away from day 1

- TT is a multidisciplinary envirnoment
- Process Mapping and R&R matrix are key for site/company TT performance
- Two main areas of working: planning & social intelligence with appropriate tools and rules
- Communication and Teamworking are key for the success of the TT
- Two main kinds of risks have to be considered during TT planning & execution:
 - ✓ Project and Process risks
- Risk Assessment and Risk Management exercises have to be initiated as soon as possibile at the beginning of the projects and mantained along the project lyfecycle



Agenda Day 2

09:00 - 9:30	Recap of the main concepts of the day 1
9:30 - 10:00	Some examples of tools coming from day 1
10:30-11:00	TR-65 - Analytical Transfer – Risk Management Approach and Tool
	Coffee Break (30 min)
11:30-12:30	TR-65 – case study 1
	Lunch Break (60 min)
13:30-16:00	TR-65 – case study 2
	Coffee Break (30 min)



Technology Transfer - Analytical Transfer



- ☐ An analytical procedure is developed to test a *defined characteristic of the drug substance* or drug product against established acceptance criteria for that characteristic;
- Each NDA and ANDA must include the analytical procedures necessary to ensure the identity, strength, quality, purity, and potency of the drug substance and drug product.8 Each BLA must include a full description of the manufacturing process, including analytical procedures
- □ Data must be available to establish that the *analytical procedures used in testing meet proper* standards of accuracy, sensitivity, specificity, and reproducibility and are suitable for their intended purpose

^{*} Analytical Procedures and Methods Validation for Drugs and Biologics – guidance for industry – FDA; VALIDATION OF ANALYTICAL PROCEDURES: TEXT AND METHODOLOGY – ICH Q2



- □ Early in the development of a new analytical procedure, the choice of analytical instrumentation and methodology should be selected based on the intended purpose and scope of the analytical method and robustness of the methodology should be challenged
- Parameters that may be evaluated during method development are specificity, linearity, limits of detection (LOD) and limits of quantitation (LOQ), range, accuracy, and precision.
- ☐ Typical validation characteristics which should be considered are listed below:
 - ✓ Accuracy
 - Precision
 - ✓ Repeatability

- ✓ Intermediate Precision
- ✓ Specificity
- ✓ Detection Limit

- ✓ Quantitation Limit
- ✓ Linearity
- ✓ Range



-To fully understand the effect of changes in method parameters on an analytical procedure, you should adopt a systematic approach for a method robustness study (e.g., a design of experiments with method parameters). You should begin with an *initial risk assessment* and follow with multivariate experiments. Such approaches allow you to understand factorial parameter effects on method performance.
- ☐ You should *describe analytical procedures in sufficient detail* to allow a competent analyst to reproduce the necessary conditions and obtain results within the proposed acceptance criteria



- □ Three approaches are suggested to be analyzed case by case:
 □ Analytical Validation (single lab or multi lab)
 □ Method verification compendial methods suitability verification
 □ Analytical comparability exercise when validated method are transferred between two labs
 - ✓ A sufficient number of representative test articles (e.g., same lot(s) of drug substance or drug product) are used by the originating and receiving laboratories. The comparative studies are performed to evaluate accuracy and precision



- The following is a list of essential information you should include when describing an analytical procedure:
 - Principle/scope
 - Equipment
 - **Operating Parameters**
 - **Reagents and Standards**
 - Sample preparation
 - Standards control solution preparation
 - Procedure
 - System Suitability
 - Calculation
 - **Data Reporting**

... ist of variables to be considered in RAI



☐ Why speak about RA in Analytical transfer?

The simplistic Validation/Comparability/Verification exercise without and additional consideration on level of method development, RU expertise and knowledge, method history and performance *is not enough* to guarantee a reproducible and effective analysis of our product during the transfer and during the commercial manufacturing production



- ☐ Prior to initiation of method transfer / implementation a 'paper based' method Risk Assessment should be performed within the RU.
- Serves as both a 'knowledge transfer' document and a tool for identifying areas of concern / potential improvement prior to use in a GMP setting.
- Risks are evaluated on specific method parameters and classified based on potential impact and likelihood of occurrence:

Likelihood Impact	Certain (4)	Possible (3)	Unlikely (2)	Rare (1)
Critical (4)	16	12	8	4
Major(3)	12	9	6	3
Moderate (2)	8	6	4	2
Minor (1)	4	3	2	1

Impact	Score	Definition
Critical	4	Risk to quality/Regulatory compliance
Major	3	AD Method RFT failure
Moderate	2	AD Method RFT risk/Future method risk
Minor	1	Nice to have/Site Preference/Efficiency

- The competed risk assessment is shared with the SU and may drive the design of formal method evaluation / transfer / validation activities.
- Upon completion of the laboratory method implementation activities a RU version of the method incorporating any incremental changes and/or cautionary statements is forwarded to the SU for approval.



Parenteral Drug Association

Chromatographic conditions	Details/Information	Likelihood (L) of method issue (R=1; U=2; P=3; C=4)	Impact (I) of method issue (Min=1; Mod=2; Maj=3; Cr=4)	Risk Rating (L x I)	Acceptable Risk (Y/N)
Manufacturer of HPLC system					Υ
defined/appropriate	See test procedure	1	2	2	'
Relevant LC detection technique	See test procedure	1	3	3	Υ
Appropriate LC detection wavelength (Assay and Rel Subs)	See test procedure	1	2	2	Υ
Single method for assay and related					
substances	See test procedure	1	1	1	Υ
Type of HPLC column acceptable for chemical					
structure	See test procedure	1	3	3	Υ
HPLC column stable under conditions of					
method	See test procedure	1	2	2	Υ
Column temperature acceptable	See test procedure	1	3	3	Υ
Sample temperature acceptable	See test procedure	1	3	3	Υ
Injection volume suitable for instrumentation	See test procedure	1	3	3	Υ
Mobile phase constituents					
(complexity/additives etc)	See test procedure	1	3	3	Υ
HPLC Method pre-column required	See test procedure	1	2	2	Υ
Needle wash appropriate	See test procedure	1	2	2	Υ
Length of HPLC run (Isocratic vs Gradient)					
acceptable	See test procedure	1	1	1	Υ
Complexity of HPLC gradient acceptable (if					
appropriate)	See test procedure	1	1	1	Υ
	pH of mobile phase	4			
	Flow rate				
Robustness of method (If known)	Mobile phase composition	lack of Robustness details into	4	16	N
	Column Temperature	the method validation provided			
	Wavelength				97



- ☐ The RU should review the analytical information and perform an analysis to evaluate gaps
- Any gap identified should be assessed for risk of failure by both the SU and the RU.
- After the initial assessments of the methods, a pre-approved protocol will be prepared to describe the experiments to be performed.

There are a number of ways in which the transfer may be performed, you need to be sure you are taking the right one!



Laboratory	Suggested Responsibilities
SU laboratory	Assess feasibility/readiness
	Compile QC/process data
	Organize training, if required
	Establish the transfer package
	 Write transfer protocol based on requirements of both laboratories and knowledge of method prior to transfer
	Establish protocol acceptance criteria
	Allocate resources for training and transfer study
	Provide critical reagents and samples
	Provide troubleshooting support
	Approve the transfer report
RU laboratory	Review the transfer package
	Define the transfer process, including training requirements
	 Inform the donor laboratory of potential issues identified (such as different suppliers of critical equipment)
	Allocate resources for training and transfer study
	Analyze transfer data
	Write the transfer report
	Inform the donor laboratory of the outcome of the transfer
	Approve the transfer report



- Since a successful validation requires the *cooperative efforts of several departments* including Regulatory Affairs, Quality Control and Analytical Research and Development, it is essential that the organization has a well defined Validation Master Plan (VMP) for analytical methods.
- The *Analytical strategy* has to be detailed in a dedicated GMP document (Analytical transfer Plan/Protocol)
- A well developed VMP must clearly define the *roles and responsibilities* of each department and Units involved in the validation of analytical methods
- A well developed VMP must clearly define the activities to be done for each method to be imported in the RU with the *scientific sound rationale* used to establish it



Technology Transfer – Some exercises



Workshop 1



☐Background:

A product dedicated to EU market, has to be outsourced from one of your site in US. The manufacturing history of the product in the current manufacturing site is not robust.

□Questions

- ☐Which Criteria will you use to select a partner?
- ☐ Describe the main attribute you will suggest to look for...



Workshop 2



□Background:

A product dedicated to EU market, has to be outsourced from one of your site in US. The manufacturing history of the product in the current manufacturing site is not robust.

The partner has been identified and selected.

□Questions

☐ Describe the main milestones to bring the product from the SU to the RU



Workshop 3



□Background:

A product dedicated to EU market, has to be outsourced from one of your site in US.

The manufacturing history of the product in the current manufacturing site is not robust.

The partner has been identified and selected.

□Questions

- □Group 1. SU Describe the project team member mainly impacted in each
- milestone
- □Group 2. RU Describe the project team member mainly impacted in each milestone



Workshop 4



□Background:

A product dedicated to EU market, has to be outsourced from one of your site in US. The manufacturing history of the product in the current manufacturing site is not robust.

The partner has been identified and selected. Agreement is in place, team members identified

- □Group 1. SU. Define the list of information/document you would prepare for the transfer
- □ Group 2. RU. Define the list of information/document you would request for the transfer





□Background:

A product dedicated to EU market, has to be outsourced from one of your site in US. The manufacturing history of the product in the current manufacturing site is not robust.

The partner has been identified and selected. Agreement is in place and path defined.

- □Group 1. SU. Define timelines for the main milestones of the project
- □Group 2. RU. Define timelines for the main milestones of the project





□Background:

A product dedicated to EU market, has to be outsourced from one of your site in US. The manufacturing history of the product in the current manufacturing site is not robust.

The partner has been identified and selected. Agreement is in place and path defined; timelines are defined.

- ☐Group 1. Thinking as Prj manager, define your idea of Value for the Project team
- □Group 2. Thinking as Project team member, define your expectation from the Prj Manager



Workshop 5 process transfer case study



□Background:

A product dedicated to EU market, has to be outsourced from one of your site in US. The manufacturing history of the product in the current manufacturing site is not robust.

The partner has been identified and selected. Agreement is in place...

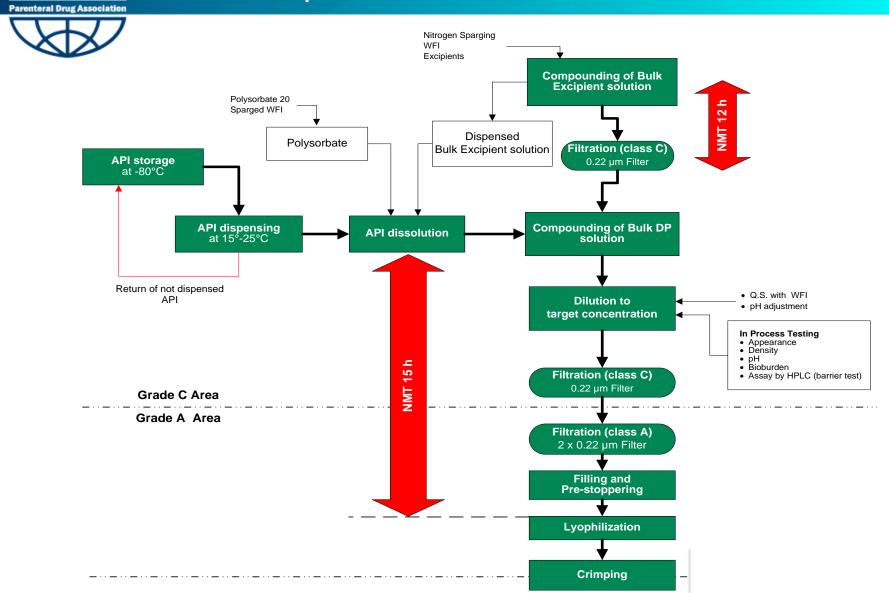
- ☐ Define the Process Variables
- ☐ Prepare a Risk Assessment based on the quality attributes defined by the SU and the
- Process Variables identified by the RU





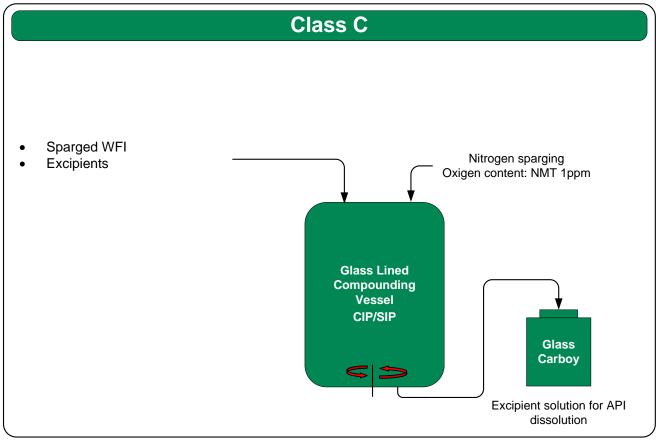
Product	YYY	
API and Pharmacological use	No special RA concern categories	
Pharmaceutical dosage form	Sterile lyophilized DP. 0.0050 mg/vial	
Product phase	Commercial	
Unit Dose composition	•API: 5.0 mg •Polysorbate 20: 0.8 mg •Sucrose:190.0 mg •Potassium Phospate, Dibasic: 18.0 mg	•Citric Acid: 22.8 mg •Phosphoric Acid: 7.0 mg •Vit E: 0.008 mg
Fill Volume (Including overfill)	10 mL	
Batch Size	120K Vials	
API Storage condition	-70°C	
Finish Product Storage	2-8°C	
Finish Product Shipment	2-8°C	



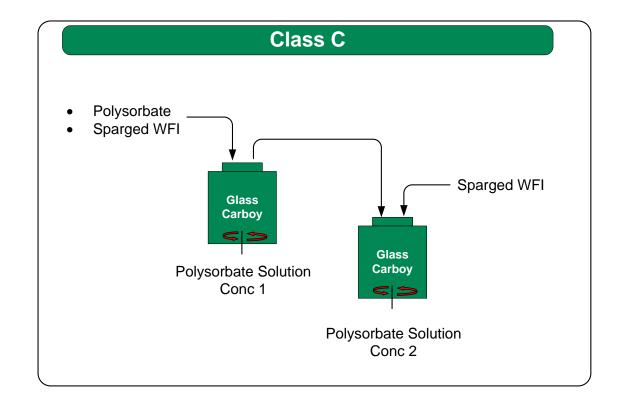




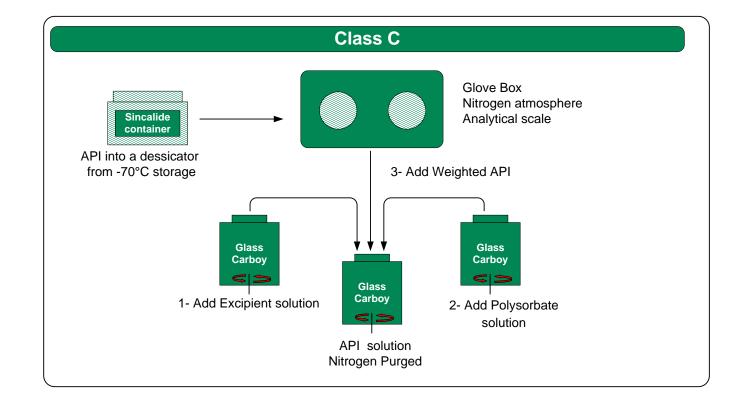






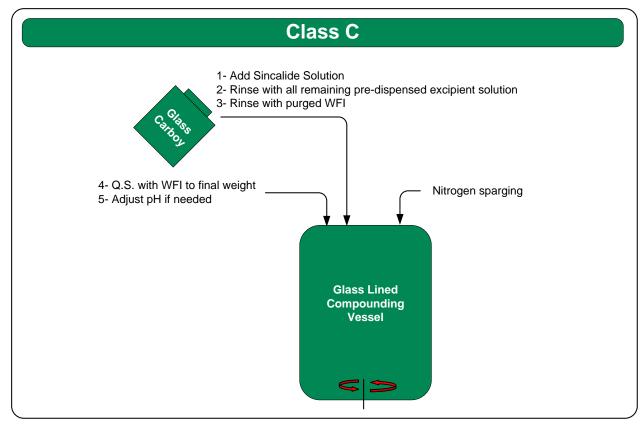






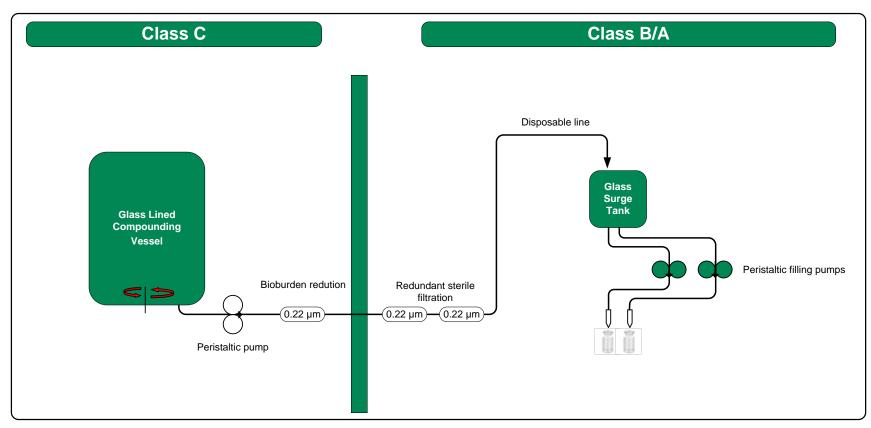














Product Quality Attributes

Micro Attributes

Endotoxins Sterility

Chemical & Physical methods

- Moisture content by KF
- Appearance of the solution (after reconstitution)
- Density of the solution (after reconstitution)
- pH of the solution (after reconstitution)
- Appearance and colour of lyophilized cake (DP)
- Particles of the solution (after reconstitution)
- Oxygen in headspace of drug product vial (CCI test).
- Uniformity of dosage units
- · Cosmetic appearance of the cake
- Impurity profile and assay
- Amorphous at X ray of the cake