a whitepaper from

NSF Health Sciences Pharma Biotech

Expert Corner

By John Johnson, NSF Health Sciences Executive Director

"The only constant in our industry is CHANGE," says John Johnson as he continues the Ask John series with three questions from our readers.

Managing change effectively has a critical influence on being able to install and operate a lean quality system. Regrettably, it is very common for firms to miss the key steps that lead to selecting, empowering and trusting their team to properly triage change and, therefore, risk. Unsurprisingly, the team then has problems defining and executing tasks systematically so that changes are properly defined, justified and documented. "A common pitfall," says John, "is to engage people in the system who seem to struggle to accept change in the first place, or who are overly risk adverse; so make sure your change management panel consists of change agents, not change guerrillas!"

The first question landing on the desk for this issue of the Journal continues this theme:

"Our company, a leader in product development with a reputation for innovation and science, has an opportunity to manufacture and market a commercial product. This should be a great opportunity as it will generate a lot of revenue, but our team is struggling to implement GMP and our site leader left the firm recently, citing a desire to stay in product development. We fear others will leave too. What advice can you offer as we manage the transition to commercial operations and keep people in development motivated?"

Many companies try to operate a commercial and development enterprise under the same quality system, as it seems that a single approach allows for a simple setting and execution of standards. However, this approach can prevent the development team in terms of cost and technical agility, and often key development scientists struggle to adapt, maybe harbor frustrations and even leave. EU GMP Vol. IV allows for a risk-based approach where the adoption of higher degrees of GMP can be justified according to the stage of the product lifecycle and utilizing a quality risk management process to define the application of GMP, where fully documented, that is accepted by the regulators. It takes time to tailor the quality management system, and many firms employ specialist contractors to perform external benchmarking or gap analysis. Being sure that the finite company resources are allocated to the areas of most risk is a must in today's business environment.

Regarding the change of leadership, be mindful that when a longstanding leader or company founder leaves, the vacuum left behind can be very difficult to fill (for those who follow English football, the case of Manchester United and Sir Alex Ferguson comes to mind). Ensuring that a successor from within the organization has been developed is critical because in times of rapid change, continuity and maintaining a deep understanding of the organization is crucial. The best transitions often come from a successor groomed from within the team who can embrace change but doesn't lose sight of what made the company successful in the first place. Once in place, the successor will need executive mentoring, personal support and time to understand the changes needed. Don't forget, it can be lonely at the top and being able to constructively debate strategic options with trusted experts is a cornerstone of effective decision making. In a transition of this type, the three key tips are to:

- Plan for change in advance and develop your staff accordingly
- Be aware that not all change is accepted by all of the team

and as a wise sage once said, “If you can’t change the people, change the people”

- Use risk-based decision making to ensure resources are allocated to the highest priority tasks
- Dust off ICH Q10, use the lifecycle concept and work hard to “right-size” your QMS for development and commercial operations

A related second question was:

“Our company grew very quickly without modifying the quality system to suit the new challenges and a year down the line we have suffered some bad feedback from GMP inspections performed both by key clients and a regulatory agency. Key people have left and we are struggling to adapt. What would be a recommended next step for us?”

In times of rapid change, it is common for firms to focus on the top and bottom lines, not the systems that manage the business. GMP issues can surface very quickly if inadequate focus is given to the quality system. In one medium-size enterprise known to me, this deterioration took place over 18 months.

Maintaining GMP compliance is not a series of rests and sprints, it is a constant steady journey. Performance of the quality system is not assured by cycles of lulls and remediation. A sustainable cadence of risk detection, assessment and steady planned improvement will always prove to be better at delivering a long-term, sustainable business.

At the heart of this issue lies an inability to perform quality planning and then to execute the improvements ahead of time. Having a risk register drive the annual objective setting process (ahead of budget setting) ensures the company “fixes the roof before it starts raining.” **In this case where GMP deficiencies have already taken hold, it is vital to:**

- Engage the local team to deeply understand the issues and then take ownership for fixing them including appointing single points of accountability for the key CAPAs to be taken
- Get a second view on the priorities and the capability of the organization to deliver the changes needed
- Ally the CAPA plan with a detailed, interactive program of education for the critical position holders so that they can learn and debate the issues, and therefore foresee and take action the next time a crunch may occur

Market research suggests that GMP remediation can be four to 10 times more expensive than a focused risk mitigation program and rarely, unless meticulously designed, drives a long-term sustainable approach to quality.

The final question on this theme was:

“We are a contract manufacturing organization with multiple client inspections each month, mostly from internationally recognized, world-class pharma companies. Customer focus is part of our DNA and we do all we can to fulfill their needs. However, many requests coming from GMP audits seem to be somewhat whimsical and are “nice to haves”. They add cost and complexity for us, not least when different clients have different interpretations of GMP! Help!”

The answer here is relatively simple:

- Align all CAPA or proposed change against EU GMP Vol. IV, the Code of Federal Regulations and the ICH standards. If it is not an explicit requirement, use a risk-based approach to assess whether:
  - What you already do is scientifically justifiable and effectively minimizes risk or impact to product quality
  - There is a alternative option that provides increased risk mitigation
- Ensure your approach to managing quality is justifiable and that the rationale for your choices is documented thoroughly
- Be aware of any client-specific needs which may be over and above those defined in the cGMPs, specify them in the Quality Technical Agreement and budget resources for them accordingly
- Keep your client relationship mature and professional; avoiding parent/child dialogue at all times. Show them you want to do the right thing by engaging with them and developing your wider team so that they can justify their approach to clients, where possible

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2001 Pennsylvania Avenue NW, Suite 950, Washington, DC 20006 USA
Tel: +1 (202) 822-1850 | USpharma@nsf.org | www.nsf.org/info/pharmabiotech

The Georgian House, 22/24 West End, Kirkbymoorside, York, UK YO62 6AF
Tel: +44(0)1751 432999 | Fax: +44(0)1751 432450 | EUpharma@nsf.org

Remember, nothing comes for free and everything that consumes resource must have a demonstrable return on investment. If it isn't recognized as valuable, it should be questioned, analyzed and, where possible, eliminated so that the resource can be reallocated to areas of higher concern.

Please send in your questions to Ask John at **johnjohnson@nsf.org** and he will answer them directly or in the next Journal.

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