

# CHAPTER 4 - DOCUMENTATION



# AGENDA

- Annex 11 — Sistemas computadorizados - IN 134/2022
- Annex 22 – INTELIGÊNCIA ARTIFICIAL – Novo
- **Chapter 4 – DOCUMENTAÇÃO - Capítulo V da RDC 658/2022**
- Chapter 1 - SISTEMA DA QUALIDADE FARMACÊUTICA - Capítulo II da RDC 658/2022

Fonte: Anvisa, 2022. Disponível em: [www.anvisa.gov.br](http://www.anvisa.gov.br). Acesso em: 10 de maio de 2022.



# CHAPTER 4 – CONSULTA PÚBLICA

- Grupo de Trabalho EMA GMP/GDP IWG and PIC/S
- Consulta pública internacional – julho de 2025 (3 meses)
- Ofício às entidades ligadas a indústria farmacêutica e ao SNVS
- Publicação de notícia no site da Anvisa



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CONSULTATION | Closed

## Stakeholders' Consultation on EudraLex Volume 4 - Good Manufacturing Practice Guidelines: Chapter 4, Annex 11 and New Annex 22

Revision of Good Manufacturing Practice (GMP) Guidelines Chapter 4 (Documentation), Annex 11 (Computerised Systems) and New Annex 22 (Artificial Intelligence)

### Details

Status	CLOSED
Opening date	7 July 2025
Deadline	7 October 2025, 23:59 (CEST)
Department	Directorate-General for Health and Food Safety

### Target audience

Public health stakeholders involved in GMP activities

The organisations representing stakeholders involved in GMP activities are encouraged to take part in the consultation and to receive all the comments of this consultation from their members, to compile and send the comments via the EU Survey tool.

### Why we are consulting

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.

To maintain the global alignment of standards, achieving at the same time assurance for the highest quality, these 3 documents have been drafted by the EMA GMPD-Inspectors Working Group in cooperation with the PIC/S.



# CHAPTER 4 – ESTRUTURA E ORGANIZAÇÃO

- 11 tópicos + glossário
- 16 páginas
- Documento ampliado e restrukturado



## 1 Chapter 4: Documentation

2 Reasons for changes: The GMP/GDP Inspectors Working Group and the PIC/S Committee jointly  
3 recommended that the current version of Chapter 4, on documentation, is revised to reflect changes in  
4 regulatory and manufacturing environments. The revised guideline clarifies requirements and expecta-  
5 tions from Regulatory Authorities with regards to documentation and takes into account related changes  
6 for Annex 11 of the GMP Guide.

### Document man

Principle

Data governance systems

Risk management

General requirements for documentation

Master Documents

Generation and Control of Documentation

Good documentation practice

Signatures in GMP relevant documentation

Retention of documents

Data Integrity in documentation

Hybrid Systems

Glossary



# DRAFT CHAPTER 4 – PRINCIPAIS MUDANÇAS

- **Data integrity:** ALCOA+ (Attributable, Legible, Contemporaneous, Original Accurate Complete Consistent, Enduring, Available)
- Inclusão de um capítulo sobre *Data Governance System*
- Novas tecnologias, serviços em nuvem, inteligência artificial, validação automática, sistemas híbridos
- Enfatiza que todos os formatos de dados (vídeo, áudio, imagens, sensores, PAT) devem atender aos mesmos requisitos
- Maior cobertura para sistemas híbridos e sistemas computadorizados
- Regras detalhadas para documentações mestra, geração e controle de documentação, boas práticas de documentação, assinaturas em documentos GMP e retenção de documentos.



## DRAFT CHAPTER 4– DATA GOVERNANCE

- Sistema de Governança de Dados dentro do PQS
- Ciclo de vida dos dados: criação até a destruição
- Gerenciamento de risco sobre a integridade de dados: *data criticality and data risk*
- Definição de propriedade dos dados ("data ownership")

Proposta para Consulta Pública  
versão 0.1  
10 de setembro de 2019



## DRAFT CHAPTER 4– RISK MANAGEMENT

- Gerenciamento de risco dos dados
- Medidas sobre a integridade dos dados – avaliação de risco
- Controles devem ser proporcionais aos riscos à qualidade do produto e segurança do paciente
- Dados eletrônicos devem estar sempre incluídos no escopo da qualificação/validação de sistemas (Annex 11).

Proposta para Consulta Pública  
Versão Draft 4 – Risk Management  
Anexo 11 – Qualificação e validação de sistemas de dados eletrônicos



# DRAFT CHAPTER 4– GENERAL REQUIREMENTS

- Reconhecimento formal de que sistemas eletrônicos, híbridos e serviços em nuvem são parte do PQS
- Responsabilidade do fabricante sobre dados processados por IA ou scripts automáticos: "*A responsabilidade pela integridade de documentos, registros ou dados brutos produzidos ou processados com inteligência artificial ou qualquer outro meio automático (ex: scripts de validação) permanece com o usuário regulado*".
- Registro de **trends** para dados eletrônicos críticos
- Princípios do ALCOA++ passa a ser requerido **explicitamente, com foco em risco humano**



# DRAFT CHAPTER 4 – SIGNATURES IN GMP RELEVANT DOCUMENTATION

- Política de assinaturas
- Identificação inequívoca do signatário
- Significância de cada assinatura (revisor, autor e aprovador)
- Assinatura como ato legal (*accountability*)
- Sistemas híbridos - definir qual assinatura (papel ou eletrônica) é regulatoriamente relevante

Proposed changes to the GMP Chapter 4  
will be published in the ANVISA  
Official Journal (DOA) for public comment.



# DRAFT CHAPTER 4 – HYBRID SYSTEMS

- Regulamenta sistemas híbridos
- Descrição detalhada de todo o sistema
- Definição da necessidade de validação de cada componente
- Procedimentos para gerenciar interface entre sistemas manuais e computadorizados
- Procedimentos para revisão, aprovação e arquivamento de dados eletrônicos e em papel

ANVISA  
Agência Nacional de Vigilância Sanitária



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- **Chapter 1 - SISTEMA DA QUALIDADE FARMACÊUTICA - Capítulo II da RDC 658/2022**

# CHAPTER 1 – PHARMACEUTICAL QUALITY SYSTEM (PQS)



# CHAPTER 1 – CONSULTA PÚBLICA

- Grupo de Trabalho EMA GMP/GDP IWG and PIC/S
  - Consulta pública internacional – setembro de 2025 (3 meses)
  - Ofício às entidades ligadas a indústria farmacêutica e ao SNVS
  - Publicação de notícia no site da Anvisa


 European Commission

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Public Health

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CONSULTATION | Open

# Stakeholders' Consultation on EudraLex Volume 4 - Good Manufacturing Practice Guidelines: Chapter 1

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## Details

Status	Open
Opening date	2 September 2025
Deadline	2 December 2025, 23:59 (CET)
Department	Directorate-General for Health and Food Safety

## Target audience

Public health stakeholders involved in GMP activities.

The organisations representing stakeholders involved in GMP activities are encouraged to take part in the consultation and to receive all the comments of this consultation from their members, to compile and send the comments via the EU Survey tool.

## Why we are consulting

The update of Chapter 1 of the Good Manufacturing Practice (GMP) guidelines is necessary to establish efficient regulatory frameworks based on good science and risk management.

This revision aligns GMP requirements with international best practices and adapts them to industry advancements, ensuring both the availability and the quality of medicines.

To maintain the global alignment of standards, this document has been revised by the IMA GMP+ Inspectors Working Group in cooperation with the Pharmaceutical Inspection Co-operation Scheme (PICoS).

- More information on [Guidelines - Volume 4 - GMP guidelines](#) ⓘ

## Revision of Chapter 1 - Pharmaceutical Quality System

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.

The revision also stresses the importance of proactive identification of manufacturing issues 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.

- Download the [soft guidance - Revised Chapter 1 - Pharmaceutical Quality System](#) ⓘ

## Respond to the consultation

If you wish to participate in the targeted consultation and you are a member of a stakeholders' organisation, please contact your organisation to submit your comments.

If you wish to participate and you are not a member of one organisation, [comments must be submitted via the EU Survey tool](#), using the specific table for each section of the guidelines.

## Legal notice

### Protection of personal data

- Please consult the [Privacy Statement](#) ⓘ



# CHAPTER 1 – ESTRUTURA E ORGANIZAÇÃO

- Mesmas 6 seções
- 8 páginas
- 14 inserções de texto (parágrafos)

## Principle

The holder of a Manufacturing Authorisation must manufacture medicinal products so as to ensure that they are fit for their intended use, comply with the requirements of the Marketing Authorisation or Clinical Trial Authorisation, as appropriate and do not place patients at risk due to inadequate safety, quality or efficacy. The attainment of this quality objective is the responsibility of senior management and requires the participation and commitment by staff in many different departments and at all levels within the company, by the company's suppliers and by its distributors. To achieve this quality objective reliably there must be a comprehensively designed and correctly implemented Pharmaceutical Quality System<sup>1</sup>, incorporating Good Manufacturing Practice and Quality Risk Management. It should be fully documented and its effectiveness monitored.

- 1 A proactive approach to quality risk management is of strategic importance in achieving an effective pharmaceutical quality system, in facilitating continual improvement and in enabling informed and timely decisions throughout the product lifecycle.
- 2
- 3

All parts of the Pharmaceutical Quality System should be adequately resourced with competent personnel, and suitable and sufficient premises, equipment and facilities. There are additional legal responsibilities for the holder of the Manufacturing Authorisation and for the Qualified Person(s).

The basic concepts of Quality Management, Good Manufacturing Practice and Quality Risk Management are inter-related. They are described here in order to emphasise their relationships and their fundamental importance to the production and control of medicinal products.

- 4
- 5
- 6

The use of risk-based drug shortage prevention and mitigation activities with respect to product quality/manufacturing risks should be considered. (See also Chapter 5 for guidance in relation to product shortages due to manufacturing constraints.)

## Pharmaceutical Quality System<sup>1</sup>

1.1 Quality Management is a wide-ranging concept, which covers all matters, which individually or collectively influence the quality of a product. It is the sum total of the organised arrangements made with the objective of ensuring that medicinal products are of the quality required for their intended use. Quality Management therefore incorporates Good Manufacturing Practice.

1.2 GMP applies to the lifecycle stages from the manufacture of investigational medicinal products, technology transfer, commercial manufacturing through to product discontinuation. However, the Pharmaceutical Quality System can extend to the pharmaceutical development lifecycle stage as described in ICH Q10, which while optional, should facilitate innovation and continual improvement and strengthen the link between pharmaceutical development and manufacturing activities. ICH Q10 is reproduced in Part III of the Guide and can be used to supplement the contents of this chapter.

<sup>1</sup> Article 6 of Commission Directive (EU) 2017/1572 requires Member States to ensure that manufacturers establish and implement an effective pharmaceutical quality assurance system. The term Pharmaceutical Quality System is used in this chapter in the interests of consistency with ICH Q10 terminology. For the purposes of this chapter these terms can be considered interchangeable.





# DRAFT CHAPTER 1 – OBJETIVO DA REVISÃO

*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.*

*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.*



# DRAFT CHAPTER 1 – PRINCIPAIS MUDANÇAS

- Incorporação do risco de desabastecimento como parte do risco à qualidade/fabricação
- Inclusão formal de uma “early warning system” para riscos de qualidade
- Reforça o foco em *Knowledge Management* como elemento do PQS
- Fortalecimento da análise de causa raiz e do uso de QRM em desvios e CAPA

Fonte: ANVISA, 2018. [www.anvisa.gov.br/legislacao/legislativo/legislativo-2018/legislativo-2018-01](http://www.anvisa.gov.br/legislacao/legislativo/legislativo-2018/legislativo-2018-01)



# DRAFT CHAPTER 1 – PRINCIPAIS MUDANÇAS

## Revisão da Qualidade do Produto

- Trending de períodos anteriores quando poucos lotes fabricados
- Agrupamento de produtos permitido (com justificativa científica)
- RPP mesmo sem fabricação no período (revisão de estabilidade, reclamações, etc.)

Fonte: Anvisa - Documento de Consulta Pública - Revisão da Qualidade do Produto - 2020



- Tradução dos documentos da CP
- Acesso às informações sobre contribuições
- Abertura de Processo Regulatório (avaliação de necessidade de publicação de uma CP nacional)

Fonte: Agência Nacional de Vigilância Sanitária  
Avaliação da necessidade de publicação de uma CP nacional



# MUITO OBRIGADA!

**Gerência de Inspeção e Fiscalização de Medicamentos e Insumos  
Farmacêuticos – GIMED**  
**Gerência-Geral de Inspeção e Fiscalização Sanitária – GGFIS**