Regulatory Basis:
FDA Quality Systems Regulations

Reference: FDA CFR - Code of Federal Regulations Title 21

General Discussion
This document addresses considerations for commercial release of batches of product manufactured prior to completion of process validation (PV) activities, and considerations for release of batches associated with performance qualification (PQ) and PV activities.

Batches of product manufactured prior to completion of PV activities may be released for commercial use following verification of acceptable results for all tests, verification that the acceptance criteria have been satisfied, the critical process parameters, ranges and materials used are the same as the proposed commercial manufacturing process and fulfilment of other site requirements for product release as necessary. Release for commercial use will require satisfactory completion of the validation study for that process, ensuring that the recommendations described in this bulletin are met for these pre-validation batches.

Release to Market of Batches Manufactured Prior to PV
Product batches manufactured prior to completion of PV activities may include Demonstration (demo) batches, sometimes called 'proof of concept' batches, pre-validation batches, or engineering batches. These are typically manufactured for the purpose of examining a new process or a process with a significant planned change that requires revalidation, to insure that the process operations are understood and work as planned before beginning production of validation batches.

Demo/engineering batches may also include material produced for clinical/formulation studies, or API batches prepared to enable validation of the Drug Product manufacturing process (prior to preparation of the API validation batches).

Each manufactured batch or campaign of batches must be reviewed individually when determining the suitability of product for commercial use. It is preferable to pre-plan manufacturing of these batches using normal site change control procedures.

PQ and pre-validation batches (e.g. demo/engineering batches) may be considered for commercial release once validation report(s) for manufacturing processes are approved. In some instances, for example, orphan drug or low volume products, an interim PV report may be acceptable. The following list summarizes conditions that should be satisfied or reviewed for suitability, prior to release of such batches for commercial use:

- If a Prospective Validation approach is used, the manufacturing process validation is complete and a summary validation report has been approved. For Concurrent validation, an interim report should be approved.

