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Strategic Imperative: Patient Safety and Compliance Through MES Validation

A robust and intelligent test strategy for Manufacturing Execution Systems (MES) like Werum PAS-X is a critical pillar of modern pharmaceutical manufacturing, directly underpinning patient safety and regulatory compliance. This strategy must ensure that electronic Master Batch Records (MBRs) rigorously enforce process parameters, maintain a flawless chain of identity (COI) for materials and products, and seamlessly integrate with the broader digital ecosystem, including LIMS, ERP, and QMS. The ultimate goal is to move beyond mere compliance with regulations like 21 CFR Part 11 and towards a state of controlled, efficient, and predictable production. The core of this modern approach is a fundamental principle: **test once – avoid duplication, reduce effort**. By implementing a risk-based, modular, and automated testing framework, manufacturers can significantly mitigate deviations, accelerate batch release, and build a sustainable model for quality and efficiency. The following strategy outlines this structured approach to validating PAS-X Generic Master Batch Records (GMBRs).

The Traditional Bottleneck: The Case for a New Validation Paradigm

Historically, the validation of GMBRs has been a significant project bottleneck, characterized by repetitive, document-heavy exercises. Each new or modified recipe, even if in 80% similar to an existing one, would undergo a full, start-to-finish validation cycle. This antiquated approach is profoundly inefficient, time-consuming, costly, and diverts valuable expert resources from innovation and continuous improvement towards repetitive testing tasks. This model is unsustainable in an era demanding agility and speed-to-market. The solution lies in adopting a modern, strategic framework built upon the twin pillars of modular design and risk-based principles. This transformation shifts the paradigm from validating monolithic recipe documents to assembling recipes from a library of pre-validated, reusable components, turning validation from a cumbersome necessity into a streamlined, efficient, and robustly compliant engine for business agility.

Architectural Foundation: Deconstructing GMBRs into Reusable Modules

The foundation of this efficient framework is the deliberate architectural deconstruction of GMBRs into their fundamental, reusable building blocks. A batch record is no longer viewed as a single, indivisible entity but as a logical and structured assembly of smaller modules. These modules include Equipment Phases or Process Modules (e.g. Weighing, Cleaning), common logic functions for calculations and data checks, and standardized templates for dynamic instructions.

The benefits of this modularization are transformative:

- **Elimination of Redundant Testing:** This is the most significant gain. A process module is validated once with exhaustive rigor. Every subsequent recipe that uses this module simply references its validation report, completely avoiding the need to re-test the same logic repeatedly. This slashes test script volume, execution time, and documentation overhead.
- **Accelerated Deployment of New Products:** Introducing a new product becomes primarily an exercise in configuration, not validation. Teams can rapidly assemble new GMBRs from the existing library of qualified modules, dramatically reducing time-to-market.
- **Enhanced Consistency and Standardization:** A centralized library enforces standardized best practices across all products and processes. This eliminates subtle, recipe-to-recipe variations in how common operations are performed and recorded, leading to higher overall process quality and fewer errors.
- **Simplified Training and Execution:** Operators work with familiar, standardized modules across different recipes, reducing training burden and the potential for human error during execution.

By creating this centralized library, the validation effort is fundamentally redirected. The intensive testing work is performed at the component level, and subsequent recipe validation simply verifies the correct assembly and data flow between these already-validated parts. This architectural shift is the single most important factor in achieving long-term efficiency gains.

Risk-Based Prioritization: Allocating Validation Rigor Based on Impact and Complexity

With a modular library established, a formal, risk-based assessment is applied to each component to determine the appropriate level of validation rigor, ensuring resources are allocated wisely. This assessment evaluates two key factors: the impact of a module failure on patient safety, product quality, or data integrity (ALCOA+), and the probability of failure based on the module's complexity, novelty, and configuration.

A high-impact, high-complexity module, such as one calculating a drug's potency or executing a sterile filtration step, would receive a "High Risk" rating. It requires full, rigorous testing (IQ/OQ/PQ equivalent) with formal scripts, negative testing, boundary analysis, and audit trail verification. Conversely, a low-impact, low-complexity module, such as recording ambient temperature, would be deemed "Low Risk" and might only require a basic checklist / static review or a reference, avoiding unnecessary documentation overhead. This risk-based approach ensures that valuable validation resources are concentrated precisely where they are needed most, enhancing both efficiency and product quality.

The Two Step Execution: Component-Level Validation and Recipe Assembly Verification

The execution of validation becomes a clear, two-step process that encapsulates the "test once" philosophy. Step one involves validating the entire library of modules and their interfaces with external systems like LIMS and ERP in isolation. This is where the greatest efficiency is realized and validation teams can exhaustively test the logic, calculations, and error handling of a module once, resulting in a Master Validation Report that serves as permanent proof of its qualification.

Step Two occurs when a new GMBR is created. The validation protocol for this recipe is predominantly a reference document. It cites the existing validation reports for all the modules it uses. The actual testing then focuses only on the unique aspects of this specific assembly: the correct sequencing of the pre-validated modules, the accuracy of parameter passing between them, and the functionality of any new, unique steps that don't exist in the library. This approach eliminates the redundant re-testing of identical steps across hundreds of recipes, slashing test volume and time-to-market dramatically.

Sustaining Efficiency: Agile Lifecycle Management and Continuous Compliance

Finally, to sustain long-term efficiency and compliance, the framework must be supported by robust lifecycle management and change control process. The modular structure makes this manageable. When a modification to a single module is required, only that specific module needs to be re-validated. An impact analysis, often facilitated by the MES itself, will instantly identify all GMBRs that use that module. Only those specific recipes require a targeted regression test to ensure the change doesn't break their flow. This is a far cry from the traditional model of re-validating every affected recipe in its entirety. This creates an agile environment where continuous improvement is feasible without incurring prohibitive validation costs. Ultimately, this transformed process results in a state of continuous compliance, where quality and data integrity are designed into the system's architecture, audit trails are clear and rationalized for regulators, and the validation function evolves from a project gatekeeper to a strategic enabler of business growth and agility.

Comparison: Traditional vs. Modern Modular GMBR Verification

Aspect	Traditional Verification	Modern "Modular" Verification
Core Concept	"Test Everything, Every Time" - Each GMBR is validated as a unique, indivisible unit.	"Validate Once, Reuse Everywhere" - GMBRs are assemblies of pre-validated, reusable components.
Architectural Approach	Linear, document centric. Focus on the entire recipe from start to finish.	Object-oriented, modular. Focus on discrete Process Modules, functions, and logic blocks.

Efficiency & Speed	Low. Extremely time-consuming and repetitive. Each new recipe requires a full validation cycle, leading to long time-to-market.	High. Dramatically faster. New products are configured from validated parts, requiring only assembly testing.
Costs	High. Constant duplication of effort leads to high labor costs and resource allocation.	Low. Significant reduction in test scripting, execution, and documentation effort. Highest cost is initial library setup.
Scope of Testing	Broad and shallow. Test coverage is spread across the entire recipe, potentially missing deep logic errors in complex steps.	Deep and focused. Intensive testing is concentrated on high-risk, complex modules. Broader coverage is achieved through reuse.
Change Management & Impact	High Impact. A change in a common step (e.g., weighing) requires retesting every single GMBR that uses it. Costly and slow.	Contained Impact. A change to a module requires only the re-validation of that module itself, followed by targeted regression testing on affected GMBRs.
Consistency & Standardization	Low. Prone to recipe-to-recipe variations as the same step might be implemented or tested slightly differently across GMBRs.	High. Centralized library enforces standardized execution of common operations across all products and processes.
Scalability	Poor. Adding new products increases validation workload linearly, creating a bottleneck.	Excellent. The library grows more valuable with each addition. Validating new products becomes progressively easier.
Audit & Compliance Story	Can be fragmented. An auditor must review validation packages for multiple recipes to see if a common step was tested consistently	Clear and rationalized. An auditor can review the single, robust validation package for a module to understand its control across the entire product portfolio.
Long-Term Maintainability	Cumbersome and Costly. Becomes increasingly difficult to manage as the product portfolio grows.	Sustainable and Agile. Built to support continuous improvement and adaptation in a regulated environment.

Conclusion: Building a Future-Proof Foundation for Digital Manufacturing

The transition from a traditional, monolithic approach to a modular, risk-based verification strategy for GMBRs is not merely a technical shift—it is a fundamental strategic transformation. It moves the validation function from being a reactive project bottleneck and cost center to becoming a proactive, value-added enabler of business agility, quality, and compliance.

By deconstructing processes into reusable components, rigorously validating them once, and then assembling them into recipes, organizations unlock unparalleled efficiencies. This "test once, reuse everywhere" philosophy dramatically reduces redundant effort, slashes time-to-market for new products, and creates a sustainable model for managing change in a complex regulatory landscape. The inherent standardization enforced by a centralized module library elevates process consistency and reduces operational risk.

Ultimately, this modern framework is more than a validation strategy; it is the cornerstone of a robust digital plant. It builds a foundation where quality and data integrity are engineered directly into the manufacturing process, audit trails are clear and defensible, and continuous improvement is not just a goal but a practical reality. By embracing this approach, pharmaceutical and life sciences manufacturers can finally leverage the full power of their MES investment to ensure patient safety, achieve regulatory compliance, and compete effectively in an increasingly dynamic market.

Our Company

FrontWell Solutions is the global front-runners in shaping the digital future of global Life Sciences ecosystems, generating value beyond. We are setting industry standards and shaping the digital future by intelligently connecting data, processes, systems, and people business partner and in the life sciences sector - powered by deep expertise and leading technologies.

FrontWell Solutions is an expert in the digital transformation of the pharmaceutical manufacturing process. Our team of experts is engaged in providing digital solutions to 12 of the 20 leading pharmaceutical, biotechnology, chemical, and medical device companies and suppliers spanning Europe, the United States, and Asia.

Our domain expertise lies across deep and differential specialized consulting services, primarily centered around Manufacturing Execution Systems (MES), Laboratory Information Management Systems (LIMS), Data and AI, Compliance seamlessly integrating these Level 3 systems with Enterprise Resource Planning (ERP) platforms and driving Manufacturing Intelligence initiatives such as Overall Equipment Effectiveness (OEE) reporting.

Moreover, we have partnered with prominent digital solutions platforms in the market, showcasing our proficiency in leveraging cutting-edge technology.

Next Steps

Thinking about taking your next steps towards the digitalization journey? Our experts are ready to support you! Contact us under ReachUs@frontwell-solutions.com or via +49 (6101) 595 89 85.