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**COMMITTEE FOR HUMAN MEDICINAL PRODUCTS (CHMP)
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<DRAFT>

**GUIDELINE ON THE USE OF NEAR INFRARED SPECTROSCOPY BY THE
PHARMACEUTICAL INDUSTRY AND THE DATA REQUIREMENTS FOR NEW
SUBMISSIONS AND VARIATIONS**

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Comments should be provided using this [template](#) to qwp@emea.europa.eu

KEYWORDS	NIR, NIRS, PAT, Near Infra Red, Process Analytical Technology
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84 EXECUTIVE SUMMARY

85 Near Infrared Spectroscopy (NIRS) has become a well established technique and has been used for
86 several years in the pharmaceutical industry. The technique is useful for the identification and assay of
87 pharmaceutical starting materials, intermediates and finished products, as well as for in-process
88 control and monitoring purposes. NIRS constitutes one of the major methods in Process Analytical
89 Technologies (PAT).

90 This guideline provides guidance on the development, calibration, validation and maintenance of
91 NIRS methods and the data to be submitted to the competent authorities when NIRS is the subject or
92 part of a marketing authorisation application.

93 This guideline also clarifies and differentiates the data requirements for the marketing authorisation
94 dossier and those for GMP, including change control.

95 This guideline should be read in conjunction Annex I to Directive 2001/83 (medicinal products for
96 human use) and Directive 2001/82 (medicinal products for veterinary use) as amended, other EMEA
97 documents and the European Pharmacopoeia, especially:

- 98 • Ph. Eur. Monograph 2.2.40.
- 99 • ICH Note for Guidance on Validation of Analytical Procedures CPMP/ICH/381/95 and VICH
100 Guidelines GL1 & GL2 on Validation of Analytical Procedures CVMP/VICH/590/98 &
101 CVMP/VICH/591/98
- 102 • Note for Guidance on Process Validation CPMP/QWP/848/96 & EMEA/CVMP/598/99
- 103 • ICH Q8: Pharmaceutical Development
- 104 • ICH Q9 Quality Risk Management
- 105 • ICH Q10 Quality System

106 1. INTRODUCTION (background)

107 1.1 Regulatory Status

108 Normally a NIRS method is used as an alternate method to one or more validated conventional
109 methods specified in the quality part of the dossier (the 'reference methods').

110 As a NIRS method generally needs to be developed and validated in conjunction with these reference
111 methods and cannot be repeated easily by official control laboratories, these reference methods and
112 corresponding specifications should remain in the authorised specifications, even for applications for
113 which NIRS is an element of PAT.

114 Once the NIRS method has been approved by the competent authorities, the specification 'if-tested'
115 may be stated beside the reference method.

116 1.2 Characteristics of NIRS

117 The main stages in developing and establishing NIRS methods are summarised as follows:

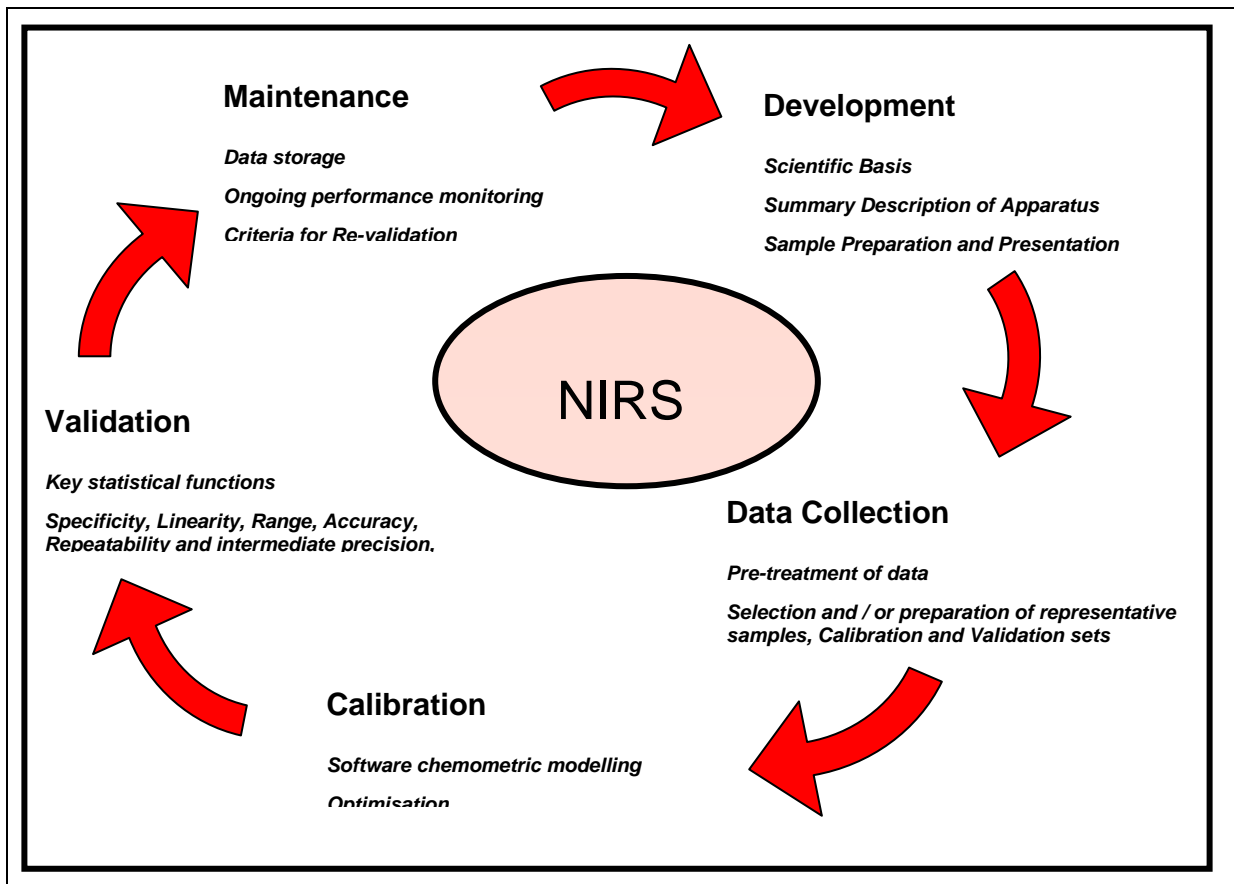
- 118 • Development
119 Scientific Basis and scope, Apparatus, Sample Preparation, Elements Affecting Spectral
120 Response, Instrument Performance, Feasibility Study
- 121 • Data collection
122 Pre-treatment of data, Preparation of representative samples, Calibration and Validation sets,
123 Spectral library, Reference methods
- 124 • Calibration

- 125 Software chemometric modelling, Optimisation, Avoidance of under and over fitting
- 126 • Validation
- 127 Key statistical functions, Specificity, Linearity, Range, Accuracy, Precision, Robustness,
- 128 • Maintenance
- 129 Data storage, Performance monitoring, Re-validation, Change management, Method Transfer

130 It is recognised that the development and implementation of a NIRS method is iterative and that the
 131 stages are interdependent (see Figure 1).

132

133 **Figure 1 The Iterative nature of NIRS**



134

135 With the statistical capability of much of the current NIRS software, it is possible to develop a NIRS
 136 method with minimal understanding of the relevant chemometrics, with the consequential high risk of
 137 invalid results arising from the influence of unknown hidden variables.

138 It is therefore emphasised that the training and skills of the NIRS analysts responsible for developing
 139 the method are of critical importance in providing assurance that the method is fit for purpose.

140 The understanding, experience and expertise of the NIRS analysts should be apparent from the quality
 141 of the narrative and data submitted with an application. This should be supported by an appropriate
 142 CV, Qualification and practical experience of the personnel involved in the use of NIRS should be
 143 subject to particular attention during GMP inspection.

144 For NIRS methods, it is possible to subject the calibration model to continuous revision and
145 refinement as new data becomes available following the purchase or production of new analyte
146 batches.

147 It is consequently possible to extend the calibration model continuously. This is considered good
148 practice for such iterative methods and is recommended. In support of this, once the calibration model
149 and change protocols have been approved, then subsequent changes of the NIRS method, to extend the
150 calibration model, need not necessarily be subject to variation. Satisfactory management of these
151 changes does however fall within the remit of GMP and the data supporting these changes should be
152 available for inspection (see Section 8 on variations). The change control procedure should address
153 the extend of calibration model.

154 2. SCOPE

155 NIRS differs from conventional analytical techniques such as HPLC or GC because chemometric
156 techniques are required for interpretation of the analyte signal. NIRS has been described in the
157 European Pharmacopoeia since 1997 and adopted in 2005, however a single reference to the
158 Monograph is considered insufficient for registration or variation.

159 NIRS is used for qualitative and quantitative analysis. It may also be used as a process analytical
160 technology (PAT) for monitoring and controlling drug substance synthesis and finished product
161 manufacturing processes.

162 NIRS may be employed in different ways, with different requirements, for defined purposes:

- 163 • A NIRS method is referred to as a primary method if it is used for final release of a drug
164 substance or a finished medicinal product. NIRS may be used at-line for Real-Time-Release
165 (RTR) when the method becomes the release method. For RTR the existing regulations should
166 be noted.
- 167 • A NIRS method is referred to as an alternative method if it is used as an alternative method to a
168 conventional (reference) method (e.g. chromatography, identification tests).
- 169 • A NIRS method is referred to as an in-process control when the method is used as a part of
170 control strategy. This may be a part of RTR-testing. Further differentiation may be required in
171 future (i.e. NIR for RTR, NIR for IPC)
- 172 • A NIRS method may also be used for data-mining purposes (process knowledge), if the method
173 is linked to elements of a PAT concept. In this case, NIRS is only used to enhance process
174 understanding

175 This guideline describes the data to be provided in the dossier for a marketing authorisation or a
176 variation and clarifies which data should be considered part of GMP.

177 This guideline does not address the use of NIRS method for containerwise confirmation of identity of
178 in coming starting materials supplementary with the use of primary method connected with an
179 appropriate statistical representative composite sample. This particular use is relevant only to GMP
180 practices.

181 3. LEGAL BASIS

182 This guideline supports applications that include NIRS methods for marketing authorisations
183 according to Directive 2001/82/EC, as amended and Directive 2001/83/EC, as amended and for
184 variations submitted according to relevant legislation in place at the time.

185 4. GENERAL REQUIREMENTS

186 4.1 Development

187 4.1.1 Scientific Basis and Establishing the Scope of the method

188 NIRS has a wide range of quantitative and qualitative applications e.g. assay of drug substances and
189 excipients, moisture content, particle size, tablet hardness, identification and reaction or process
190 monitoring. However, the limitations of the method, namely in sensitivity and selectivity, mean that
191 its application requires a sound understanding of the physico-chemical basis on which its
192 measurements rely and of the instrumental and chemometric principles involved.

193 The broad responsiveness of NIRS to the potentially many chemical and physical attributes of the
194 sample matrix under examination, with its relatively weak and overlapping spectral bands, can be
195 confounding and make it difficult to determine if the specific attribute under consideration is
196 differentiated by the method. The applicant should discuss the scope and purpose of the NIRS method
197 under development and show it to be unambiguous, appropriately limited and justified, (see also 4.6)
198 supported by spectral evidence that the NIRS response is relevant to the analyte or property under
199 consideration e.g. evidence that the drug substance exhibits a characteristic NIR absorption.

200 The samples used for model development should be relevant to and within the scope of the purpose of
201 the method.

202 The NIRS method should, as a pre-condition, be able to reject samples that are outside of its defined
203 scope (e.g. out of range, compositionally incorrect).

204 Following on from this, the complex informative content of the NIRS signal requires chemometric
205 modelling, using sophisticated statistical software packages. These work by correlating, in a purely
206 empirical fashion, the variance in the NIRS signals to a number of latent variables or factors,
207 constrained by a set of calibration reference data. There is always a risk that the correlations identified
208 by the software are due to chance only and not to changes in the analyte. To minimise this risk, the
209 software must be used in a systematic way to prevent the chemometric model from becoming divorced
210 from the physics and chemistry that forms the basis of the analysis.

211 Signal pre-treatments may be used to eliminate or minimise those components of the NIRS signal that
212 can be shown not to include the analyte signal and are therefore irrelevant. This minimises the
213 potential for chance correlations. Pre-treatments are an important element in method development.

214 It is important that the applicant identify assumptions made during development, which should be
215 described and justified. For example, an assumption of linearity of the NIRS signal to changes in the
216 analyte or property under consideration would be acceptable, on fundamental spectroscopic grounds,
217 for drug substance assay, but should be proven for other attributes e.g. particle size, hardness.

218 The strengths and weaknesses of the proposed method should be discussed and these taken into
219 account in calibration and validation.

220 4.1.2 Summary Description of Apparatus

221 Summary pertinent details of the apparatus should be provided, including the instrument manufacturer
222 and model number, the instrument type (e.g. filter, grating, FT, acousto-optic tuneable filter (AOTF),
223 diode array), spectral range, resolution, sampling devices, and any other additional components or
224 controls considered necessary for the proposed method.

225 The measurement method e.g. transmission, diffuse reflectance, transreflectance, should be described.

226 The means of data collection and analysis, and associated software packages should also be described.

227 The suitability of the apparatus and software for the intended use should be discussed, including
228 software validation.

229 The statistical parameters used should be unambiguously defined and their function fully described.
230 These should be consistent with those described in the glossary.

231 *4.1.3 Sample Preparation and Presentation*

232 A 'sample' in this guideline refers to an individual batch and should not be taken to mean samples
233 from a single batch (composite sample).

234 Details of sample preparation, if any, should be provided, justified and shown to be robust.

235 The means by which the sample is presented to the NIRS detector should be described. The impact of
236 possible variations in the presentation on the NIR response should be discussed, supported by
237 appropriate data, and, if shown to be significant, demonstrated to be satisfactorily controlled.

238 The spectral range employed should be described and justified.

239 The number of scans recorded per sample should be stated and also justified.

240 *4.1.4 Elements affecting Spectral Response*

241 Background physical and chemical elements may be present, both internal and external to the sample,
242 possibly uncontrolled and outside the scope of the proposed NIRS method. These could influence the
243 spectral response obtained, introducing variance and bias and undermining calibration and validation.

244 It is not possible to list all possible interfering elements, but these include: the environment in which
245 measurement takes place; sample temperature; residual moisture and solvents; sample thickness;
246 sample optical properties; optical quality of the glassware; polymorphism; particle size; homogeneity
247 and the age of the samples. Time of measurement and instrumental drift should also be considered.

248 The relevance of the interference of any element is dependent on the nature of the method, but may be
249 wider in extent when little or no sample preparation is involved.

250 Each potential interfering element that may affect the spectral response should be considered and
251 discussed in turn and either shown to be insignificant or satisfactorily controlled, supported by
252 appropriate data.

253 *4.1.5 Verification of Instrument Performance*

254 It should be confirmed that the instrument is verified according to manufacturer's recommendations
255 and that the instrument complies with the requirements of the Ph. Eur. 2.2.40 Near-Infrared
256 Spectroscopy. Qualification protocols, reports and periodicity of re-qualification should be subject to
257 GMP inspection.

258 *4.1.6 Feasibility Study*

259 A feasibility study should be undertaken to show that NIRS analysis is possible, to include for
260 example, evidence that a suitable NIR response can be obtained, linearity, investigation of potential
261 confounding factors, matrix interference, sample handling and preparation, as discussed above.

262 The capability to reject out-of-scope samples and identify outliers should also be investigated.

263 A report of the feasibility study should be provided

264 **4.2 Data Collection**

265 *4.2.1 Selection and/or preparation of representative samples, calibration or validation sets*

266 **Sample collection and population**

267 Samples for NIRS analysis should be representative of routine production and should therefore be
268 collected according to approved standard operating procedures for sampling and reflect the established
269 manufacturing process capability.

270 Before any NIRS measurement takes place, it is very important to optimise the presentation of the
271 sample to the NIRS instrument. Examples of factors that should be optimised are sample orientation,
272 sample size, optical quality of glassware and environmental conditions.

273 The sample population for a quantitative or a qualitative method should cover all potential variation
274 that may be encountered in routine production. Such variation may include:

- 275 – Concentration of the analyte in question
- 276 – Particle size
- 277 – Suppliers
- 278 – Water content
- 279 – Residual solvent content
- 280 – Variations in the matrix (excipients)
- 281 – Process variation (samples collected over an extended period)
- 282 – Sample age

283 **Outliers**

284 Any suspected ‘out-of specification’ results from the calibration and validation sample sets should be
285 re-analysed using the reference method. The exclusion of any such samples should be documented
286 and justified by the applicant.

287 If a sample is rejected and shown to be an outlier because of characteristic properties, the rejected
288 sample should be verified using an appropriate alternative analysis. After the confirmation of
289 authenticity, the sample should be included in the spectral reference library and the model should be
290 fully re-validated so as to include this source of variation.

291 Procedure for handling of “out-of specification” results should address outliers and recording should
292 be subject to GMP inspection.

293 *4.2.2 Pre-treatment of Data*

294 Given that NIR spectra are affected by physical parameters such as particle size and sample
295 presentation, raw NIR spectra are mathematically manipulated prior to development and testing of the
296 calibration model. Such manipulations may include smoothing, baseline correction or derivatisation,
297 which are performed in order to remove unwanted sources of variation from the data prior to
298 manipulation and to enhance spectral features.

299 NIRS signal pre-treatments are used to reduce the number of latent variables or factors (see Section
300 6.3.3) and consequently sample numbers.

301 Caution must be exercised when performing any pre-treatments because artefacts can be introduced or
302 essential information can be lost. An understanding of the algorithm is required and in all cases the
303 rationale for the use of pre-treatments should be documented.

304 Serial pre-treatments such as normalisation followed by derivatisation should be specified; reference
305 to ‘standard pre-treatments’ is unacceptable. Any pre-processing of the data carried out by the
306 software by default should be stated. Given that calibration models are generated based upon the
307 variation present in the spectra, the selection of any additional pre-treatment should be justified.
308 Exemplary spectra to demonstrate the effect of the pre-treatments should be provided and discussed.

309 *4.2.3 Establishment of a Spectral Reference Library*

310 The composition of the spectral reference library should cover the scope of the NIRS method and
311 should be subject to a change control process subject to GMP inspection.

312 Batches should be representative of the marketed materials or products and laid down in a list of batch
313 numbers.

314 It should be verified that the spectra used to create the spectral reference library are correctly recorded
315 according to the defined analytical procedure.

316 For qualitative analysis, where the spectral reference library is very large or diverse, it may be useful
317 to divide the library into appropriate ‘sub-libraries’ to avoid calibration models becoming too
318 complex. The choice of subsets and the degree of sub-libraries should be described and justified.

319 *4.2.4 Analysis by the reference method*

320 The samples used for NIR calibration and validation require quantitative values to be assigned for the
321 attribute under consideration or authentication for the attribute under consideration and therefore
322 require analysis by a suitable reference method.

323 Ideally, reference measurements should take place at around the same time as NIR scanning. Any
324 differences between sample treatments in the reference and NIRS methods should be stated (e.g.
325 grinding or blending).

326 The suitability of the reference method should be justified with respect to the intended purpose of the
327 NIRS method.

328 Data to support the choice of reference method should be provided and should include:

- 329 – A description of the analytical procedure according to Module 3.2.P.5.2¹ data requirements.
- 330 – Details of the validation of the analytical procedure according to Module 3.2.P.5.3¹ data
331 requirements and ICH Q2(R1) Note for Guidance on Validation of Analytical Procedures: Text
332 and Methodology (CPMP/ICH/381/95) (for Veterinary applications: VICH GL1 & GL2
333 Validation of Analytical Procedures CVMP/VICH/590/98 & CVMP/VICH/591/98).
- 334 – Details of relevant reference standards and materials according to Module 3.2.P.6¹ data
335 requirements.

336 **4.3 Calibration**

337 Specific requirements for calibration are described in the sub-chapters for ‘Quantitative Methods’ and
338 ‘Qualitative Methods’.

339 **4.4 Validation**

340 Validation of NIRS methods should comply with the guidance given in ICH Q2(R1) Note for
341 guidance on validation of analytical procedures: text and methodology (CPMP/ICH/381/95) (for

¹ Or equivalent in the Notice To Applicants format for Veterinary dossiers.

342 Veterinary applications: VICH GL1 & GL2 Validation of Analytical Procedures CVMP/VICH/590/98
343 & CVMP/VICH/591/98) and data requirements for Module 3.2.P.5.3².

344 The validation set of samples should be completely independent of the calibration set (see 5.4 and
345 6.4). The suitability of the validation set, including its independence from the calibration set, should be
346 discussed and justified.

347 The basis of the validation is the comparison of results obtained by analysis of the same set of samples
348 by the NIRS and reference methods.

349 In all cases, the acceptance criteria for validation should be specified and justified with reference to
350 the intended purpose of the method.

351 If the NIRS method is being presented in the initial registration dossier, validation data should also be
352 presented for the reference analytical method (see section 4.2.4 Analysis by the reference method).

353 If the NIRS method is being registered as a variation to a licence in which the reference method is
354 already approved, then a summary of the validation data for the reference method, in compliance with
355 CPMP/ICH/381/95 (or CVMP/VICH/590/98 & CVMP/VICH/591/98), should be provided.

356 Departure from guidance should be justified and will be considered on a case-by-case basis.

357 **4.5 Change Control and Maintenance**

358 **4.5.1 Planned and Unplanned Changes**

359 Changes (both planned and unplanned), that might affect the performance of a NIRS method may
360 necessitate re-validation of the whole NIRS model to demonstrate continued selectivity and
361 robustness.

362 Change control protocols are important for qualitative methods where spectra of batches are likely to
363 be added to the spectral reference library to keep it up to date and to all NIRS methods in case of
364 relevant changes to the instrumentation, which cannot be controlled by the analysis of performance
365 verifications alone (e. g. changes in the physical properties of the substance or in the source of
366 supply).

367 A relevant change control protocol, in compliance with EU GMP requirements Annexes 15 and 20,
368 should be submitted. The implementation of this protocol will be subject to GMP inspection.

369 Changes should be fully documented, and include appropriate re-validation and comparability reports,
370 to show that the revised method is consistent with that approved. When appropriate the dossier should
371 also updated by variation. (see Section 8)

372 For qualitative methods, suitable change control tests should be in place for each method and spectral
373 reference library. This test should be composed of a minimum of two standard sets (i.e. two classes or
374 substances) for which separation is most critical. If the NIRS method does not comply with the
375 change control test, it should be fully re-validated. It should be demonstrated that the suitability of the
376 change control test remains stable over time.

377 Change control requirements specific to quantitative methods are included under Section 8.

378 Some potential changes, including changes to instrumentation, can be included in the calibration
379 model. Data generated to demonstrate robustness may show that some changes have no effect.

² Or equivalent in the Notice To Applicants format for Veterinary dossiers.

380 Comparison of the chemometric results applied on the spectra present in the spectral reference library
381 with the current and replacement software is suitable as change control test but should still be
382 described, including details of any statistical analysis performed.

383 *4.5.2 Revalidation*

384 The NIRS method should be challenged periodically with the related reference method to ensure its
385 ongoing validity. A sample of a batch should be analysed by both the reference method and the NIRS
386 method and the results compared. For quantitative methods, revalidation should be carried out at
387 minimum, centre and maximum concentrations in calibration range.

388 Requirements for revalidation should be discussed and justified in the change control protocol.
389 Revalidation reports and relevant recording should be subject to GMP inspection.

390 *4.5.3 Out of Specification results in routine batch analysis*

391 An out of specification result for routine batch analysis by the NIRS method should result in rejection
392 of the batch.

393 If, on investigation, the batch complies with the specification using the reference method, then this
394 may indicate that the NIRS method is not been fully optimised (e.g. there may be over-fitting (see 6.3)
395 and the out of specification result is a false negative.)

396 Alternatively, the inconsistency in results between the NIRS and reference method may highlight a
397 more fundamental issue in the characterisation of the quality of the product.

398 The affected batch should not be released onto the market, without investigation and justification.

399 For quantitative analysis, if it is confirmed that the NIRS model was not optimal, then the method
400 should be redeveloped appropriately. In these circumstances, the change in the NIRS method should
401 subject of regulatory review, by variation.

402 If the batch on re-analysis using the redeveloped method is found to be within specification, and the
403 variation is approved, then they may be released onto the market.

404 For qualitative analysis, an appropriate change control report, including details of the results and
405 conclusions of the investigation and any necessary revalidation, should be prepared and made
406 available for GMP inspection.

407 *4.5.4 Extrapolation beyond the scope of the NIRS method*

408 NIRS is valid only if interpolated within the defined scope of the method.

409 The use of a calibration model to analyse samples with characteristics outside of the defined scope of
410 the method is not valid and would be considered a major GMP deficiency.

411 The extension of the scope of the method (e.g. widening of the range of interest) should by variation
412 only.

413 **4.6 Summary of Data Requirements**

414 The following should be provided:

- 415 • The scope of the method

416 The aims of the method should be specified, appropriately limited and justified and include details
417 of instrumentation and software, sample preparation and handling, spectral pre-treatments, factors
418 affecting spectral response, and verification of instrument performance

- 419 • A report of the feasibility study

- 420 • Details of the composition of the calibration and validation sets, with justification
- 421 • Description of the reference method
- 422 • Details of the establishment of the spectral library
- 423 • Calibration report
- 424 • Validation report
- 425 • Change Control Protocol(s)

426 5. QUALITATIVE METHODS

427 5.1 Development

428 NIRS has a wide range of qualitative applications, almost all of which could be divided into three
429 major areas:

- 430 – Identification
- 431 – Qualification
- 432 – Conformity Checks

433 In Pharmacopoeial monographs, identification is defined as the confirmation of a certain chemical
434 entity. However, the pharmaceutical industry uses a wider concept, implying that identification may
435 also include differentiation between different qualities of one chemical entity (e.g. particle size,
436 polymorphs).

437 To allow differentiation, this guideline uses the terms **identification** (only chemical structure) and
438 **qualification** (chemical- and physical attributes).

439 Conventional identification is generally based on more than one analytical method. Consequently, it
440 should be clear, if applicable, which reference methods will be replaced by the NIRS method. Tests
441 used for identification or qualification are those performed for inspection of incoming raw materials,
442 intermediates or finished products.

443 In addition to the definitions for identification and qualification, this Note for Guidance uses the term
444 **conformity** as the conformation of characteristics in accordance with a certain degree of similarity
445 (chemical and/or physical attributes) to a specified standard (e.g. standardised spectra). Conformity
446 checks are often used in manufacturing processes as in-process controls for monitoring purposes or as
447 a part of a PAT-concept (e.g. determination of an endpoint).

448 The identification or qualification of a substance (e.g. drug substance, excipient, blend, drug product,
449 intermediate) using NIRS is based on the comparison of the spectral data of the substance with the
450 spectral data of several samples of several batches of different substances present in a spectral
451 reference library. Chemometrics will usually be necessary to compare the data and to draw
452 conclusions (pass, no match or ambiguous). The appropriate confidence level of the conclusion
453 should be defined statistically and justified.

454 If an ambiguous conclusion is obtained, the method should be adjusted such that the substance will be
455 correctly approved or rejected, or those substances that interfere should be excluded from the scope of
456 the method. Interfering substances or grades of substances may also be classified as one single entity if
457 possible (e.g. different grades of lactose).

458 The classification of a substance can be done in several stages. For example, a classification of
459 chemical identity or a group of related substances may be performed, followed by application of more
460 selective models for each individual grade or substance. This approach can be used to decrease the
461 likelihood of false positives/negatives. Qualification is often performed after the identification of the
462 sample has been ascertained. In this case, a model for qualification measures how well a sample fits

463 in with a model which is derived from samples chosen to represent the defined variability of a
464 chemically identical substance.

465 Sample preparation, presentation and the consideration of elements affecting the spectral response
466 should be carried out as described in the Section 4.1.

467 A feasibility study should be performed and reported as discussed in Section 4.1.6, which should show
468 that separation of relevant materials/substances is possible.

469 **5.2 Data Collection (qualitative methods)**

470 *5.2.1 Selection and/or preparation of representative samples, calibration and validation* 471 *sets*

472 **Sample collection and population**

473 The selection of samples, and where necessary the subsequent extent of spectral library development,
474 will depend on the complexity of the application. All samples should be verified with the
475 conventional reference methods, which are included in the registered specification. The validation of
476 the method should demonstrate that spectra of an acceptable minimum number of batches have been
477 included in the calibration and validation sets and that these batches are sufficiently representative to
478 cover the normal variation of the substance.

479 All samples for qualitative methods should be representative of routine practice and should therefore
480 be collected according to standard operating procedures and in line with established manufacturing
481 process capability. The sample population should cover all potential variation that may be
482 encountered routinely, e.g. particle size, suppliers, moisture, residual solvent content, variations in the
483 matrix (excipients) and process variation (including samples collected over an extended period).

484 Where laboratory or pilot scale samples are required to expand the narrow range of production
485 samples to properly assess sensitivity in line with specification limits, such samples should be
486 prepared using the same manufacturing procedure as used for routine batches.

487 The balance of production to development batches in all sample sets should be justified with respect to
488 the variation expected in routine production. The choice of samples should be sufficient to ensure the
489 robustness of the method for routine use.

490 For conformity check (in-process controls and monitoring purposes) the reliability of the chosen
491 method should be demonstrated by appropriate validation according to Section 4.4. Depending on test
492 type, the validation may be less extensive, if justified.

493 **Number of samples**

494 The number of samples to be included in the spectral library in order to create a valid calibration
495 model for qualitative analysis will depend on the complexity of the sample matrix and/or NIR signal
496 and should be fully justified. In general, the more complex the sample matrix, the more samples will
497 be required to cover the statistical population. A minimum of three or more spectra of *at least* six
498 batches (together called the training set) are required. The number of batches should be sufficient to
499 cover normal production variation and should be justified.

500 **Composition of training set, training test set and validation sets**

501 In order to develop, optimise and validate a calibration model for a qualitative method, the following
502 sets of samples are required:

- 503 • The training set for creating the calibration model
- 504 • The training test set for optimisation and choice of the calibration model (if necessary)

505 • The independent validation set for validation of the proposed chosen model

506 Each set of samples should be representative of the scope of the NIRS method, as defined under
507 section 6.2.1, and include samples covering the full range of potential variation in the sample
508 population (both qualitatively positive and negative).

509 The selection of the appropriate calibration model may be supplemented either by so-called ‘internal
510 validation’ or ‘calibration test set validation’ methods. ‘Internal validation’ is the application of
511 resampling statistics such as cross-validation or bootstrapping. In summary, subsets of the spectral
512 reference library data are subjected to a variety of statistical processes to identify which calibration
513 model may best fit the available data.

514 ‘Calibration test set validation’ is the application of the variety of calibration models generated using
515 the training set of samples to the training *test* set (for which spectral and reference method data are
516 available), which are drawn from the same population as the training set, but are not used to generate
517 the calibration model. The descriptive statistics for the training test set are used to determine whether
518 the model is optimal.

519 The chosen model should differentiate all samples and verify them unambiguously.

520 **Outliers**

521 Only in exceptional cases may outliers appear in a qualitative spectral reference library. Therefore,
522 the exclusion of such a sample should be carefully justified by the applicant (see also Section 4.2.1,
523 subsection Sample collection and population).

524 *5.2.2 Analysis by the reference method*

525 For sample qualification, the additional information for further differentiation of a substance according
526 to other characteristics such as grade, polymorphic or hydrate form should also be carefully
527 ascertained by suitable reference methods (see Section 4.2.4).

528 **5.3 Selection of calibration model**

529 The selection of the most appropriate method of calibration depends on the scope of the spectral
530 library. In general, the simplest available model which gives successful results should be used.

531 There are many different kinds of classification methods which could be divided into several
532 categories. Common methods are Principal Component Analysis (PCA), Discriminant Analysis
533 (linear or quadratic), Soft Independent Modelling of Class Analogues (SIMCA), Cluster Analysis
534 (dendrograms), k-Nearest-Neighbourhood-Analysis (kNN-Analysis) and Supported Vector Machines
535 (SVM).

536 All of these methods deal with the measurement of distances in multidimensional space between an
537 unknown sample and a well-defined group of samples or additionally within this group of samples (e.
538 g. Euclidean Distance, Mahalanobis Distance/Leverage).

539 It is almost always necessary to determine thresholds or/and confidence limits for a proper verification
540 of samples. To optimise the performance of the chosen method, characteristic performance values
541 should be in the validation procedure.

542 **Optimisation**

543 In general, the optimisation of a qualitative method is confined to the selection of the samples included
544 in the spectral reference library and the chosen calibration model.

545 **5.4 Validation**

546 Validation of a qualitative NIRS method should consist of validation for specificity (selectivity) and
547 robustness. Possible adjustments are a change of pre-treatment and a change of thresholds, expulsion
548 of substances from the scope of the method or classification of substances as one. The results of the
549 final validation should be submitted to the competent authorities with a summary discussion.

550 The objective of an internal validation is to ensure the performance of the spectral reference library.
551 Generally this is evaluated by testing the samples of the spectral reference library using cross-
552 validation techniques or a where necessary a discrete training test set. This step should demonstrate
553 that all samples of the spectral reference library are verified unambiguously by the chosen model with
554 defined thresholds or/and confidence limits.

555 External validation of the method should demonstrate the performance of the chosen model by an
556 independent validation set consisting of samples which were not used in the creation of the spectral
557 reference library.

558 Unlike other qualitative methods that could be used to identify or verify defined qualities, NIRS is not
559 able to specify uniform statistical parameters of performance for identification or qualification.

560 However, the statistical parameters used to evaluate the performance of the model should be fully
561 described and their suitability for the intended purpose should be justified.

562 As a general rule, using appropriate thresholds or confidence limits, it should be demonstrated that a
563 confidence level of at least 0.95 is assured. Methods with a confidence level less than 0.90, are not
564 considered acceptable.

565 The use of methods with a confidence level between 0.90 and 0.95 should only be accepted in
566 exceptional cases and should be justified in detail (e.g. small number of characteristic samples at the
567 beginning of method development). Where necessary a risk analysis should be presented by the
568 applicant.

569 These thresholds are stated as a general rule only. Each model should be taken on a case-by-case
570 basis. For example, if a confidence level of 0.99 is consistently achieved for the identification of a
571 substance from a spectral library, then it would be expected that the threshold of acceptance would be
572 tightened in line with the data obtained.

573 **Specificity (selectivity)**

574 The extent of specificity (selectivity) testing depends on the intended application of the NIRS method.
575 Lack of specificity (selectivity) of the method may be compensated by other supporting analytical
576 procedures.

577 Independent samples of substances represented in the spectral reference library, but not used to create
578 it (i.e. different batches, blends), must be tested and all approved correctly (pass).

579 Potential challenges should be presented to the spectral reference library. These challenges should be
580 rejected (no match). For the identification or qualification of pharmaceutical substances, relevant
581 existing name- and structure-analogues should be included in the validation set, unless their absence is
582 justified. Justification can be based on:

583 - The number of included analogues in view of the total number of existing analogues (the
584 validation set should be sufficiently representative for the whole set of all existing analogues).

585 - The expected NIR spectral characteristics of the analogues.

586 - The probability of the presence of the analogues in the relevant pharmaceutical setting.

587 Where applicable (e.g. qualification applications), validation should include challenge with different
588 grades of the same substance, anhydrous/hydrated material or different polymorphs etc. or material
589 supplied by different vendors. Consideration should also be given to materials manufactured by
590 external suppliers that could be delivered in error.

591 The results of the validation should demonstrate unequivocally that for each tested parameter, the
592 NIRS method is sufficiently selective to discriminate between batches that comply with the tested
593 parameter and batches that do not, in the same way as for the reference method.

594 The composition of the validation set should be described unambiguously and should be justified.

595 **Robustness**

596 Effects of possible, relevant variations e.g. temperature (environment and sample), humidity, different
597 position of the sample in the optical window, different sample presentation devices, variation in
598 sample bottles/vials, probe depth or, if applicable packaging materials, should be understood, tested
599 and documented. Instrumental variations may also be considered in the validation for robustness, e.g.
600 changing lamps, reflectance standard etc. As such, some variations and potential changes may already
601 be included in the calibration during the development of the method.

602 The use of experimental design may be considered to maximise the information available.

603 **6. QUANTITATIVE METHODS**

604 **6.1 Development**

605 **Feasibility Study**

606 A feasibility study should be undertaken to show that quantitative analysis is possible (as discussed in
607 Section 4.1.6) and should include evidence of linearity, as appropriate.

608 Examples of evidence of a suitable NIRS response include the submission of data showing that the net
609 analyte NIR signal is significantly greater (>10) than the NIRS noise arising from the sample matrix,
610 or using standard addition techniques, with appropriate spectral inspection.

611 The study should include an appraisal of the potential methods of calibration that could be used,
612 estimation of the likely number of latent variables or factors and consequentially sample number
613 requirements, together with clear definitions and descriptions of the proposed statistical parameters
614 and indicators to be used for assessment of the method.

615 The capability to reject out-of-scope samples and identify outliers should also be investigated.

616 A report of the feasibility study should be provided

617 **6.2 Data Collection**

618 *6.2.1 Selection and/or preparation of representative samples, calibration and validation* 619 *sets*

620 **Sample collection and population**

621 See Section 4.2.1.

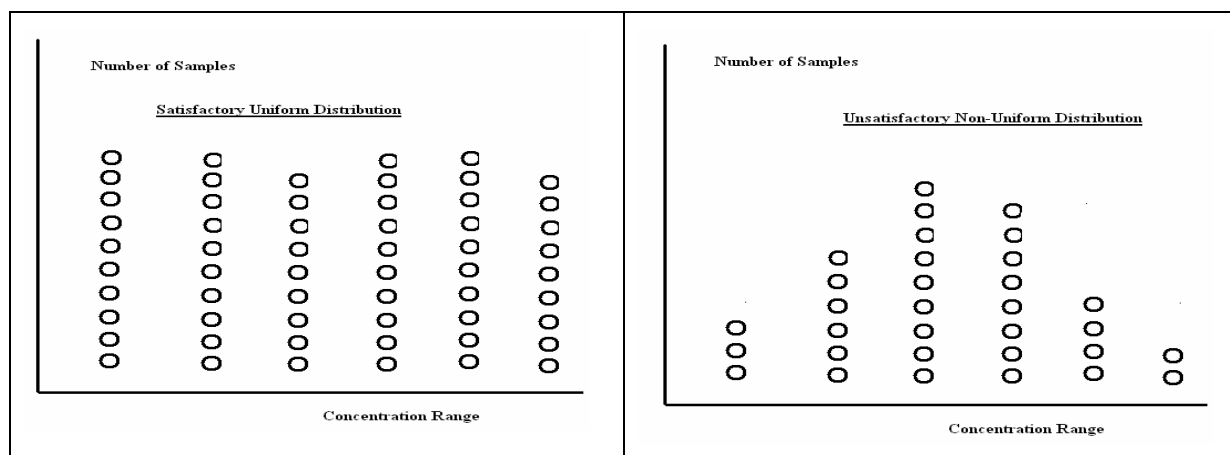
622 Where feasible, samples of production batches should be augmented with those from development
623 batches, manufactured specifically to simulate the limits of potential variation in the sample. Where
624 laboratory samples are required to expand the narrow range of production samples to properly assess

625 linearity in line with specification limits, such samples should be prepared using the same
626 manufacturing procedure.

627 The balance of production to development batches in the sample set should be justified with respect to
628 the variation expected in routine production.

629 In keeping with the fundamental assumptions made in the application of regression correlation
630 statistics and to prevent bias, a uniform distribution of samples throughout the range of potential
631 variation should be ensured (see figures below); a factorial experimental design may be used to this
632 end. Evidence of this should be provided.

633 The choice of samples should be sufficient to ensure the robustness of the method for routine use.



634 **Number of samples**

635 It is expected that interference of the matrix components will be examined during feasibility studies
636 and an appropriate sample collection method and calibration model chosen, together with an estimate
637 of the number of latent variables or factors.

638 To avoid bias, the number of samples used to develop the calibration model should be very much
639 greater than the number of such factors. A minimum standard of a 6:1 ratio of sample measurements
640 to factors is proposed by the ASTM¹. Another commonly used informal rule of thumb is a 10:1 ratio.

641 The number of samples to be included in the spectral library in order to create a valid calibration
642 model for quantitative analysis will depend on the complexity of the sample matrix and/or NIR signal.
643 In general, the more complex the sample matrix, the more samples will be required. For example, if
644 the sample matrix consists of two simple components only, the number of samples required will be
645 lower than if a multi-component, complex system is to be analysed. For the latter, a more complex
646 chemometric model may be required, for which a greater number of samples will be required to ensure
647 its validity.

648 The number of samples included in the calibration and validation sample sets should be fully justified.

649 **Composition of calibration and validation sample sets**

650 To develop, optimise and validate the calibration model for quantitative analysis, three sets of samples
651 are required (similar to those described for qualitative methods, however nomenclature may be
652 different):

- 653 • The calibration set for creating the calibration models.
- 654 • The calibration test set for optimisation and choice of calibration model (if necessary*)
- 655 • The independent validation set for validation of the proposed chosen model.

656 The calibration set of samples is used to generate potential calibration models and as such, should
657 include samples covering the full range of potential variation, within the defined scope of the method
658 (see Section 4.1.1).

659 The optimisation and choice of the calibration model is normally undertaken either by so-called
660 'internal validation' or by 'calibration test set validation' methods (see Section 6.3.2).

661 It should be emphasised that this does not represent independent validation of the NIRS method,
662 which must be carried out using a third, entirely independent set of samples.

663 *Optimisation by 'Internal validation' is a statistical resampling method that reworks the calibration
664 set data, such that the calibration test set of samples is not required. A fuller discussion of 'internal
665 validation' is given in Section 6.3.2. This is commonly used when fewer samples are available.

666 'Calibration test set validation' is the application of the calibration models generated using the
667 calibration set of samples to the calibration *test* set, which contains samples drawn from the same
668 population as the calibration set, but which were not used to generate the calibration model. In
669 practice, the calibration set often consists of two thirds of the available sample population. The
670 calibration test set is the remaining third. The applicant should give the rationale for the composition
671 of calibration and calibration test sample sets and justify their suitability.

672 The validation set is an entirely independent third set of samples, which should cover the full range of
673 variation in the sample population. The size and composition of batches included in the validation
674 sample set should be discussed and its suitability justified. This set is used to validate the calibration
675 model generated either by 'internal validation' or 'calibration test set validation' and is used to
676 generate the statistical parameter, the Standard Error of Precision (SEP), which is an indicator of the
677 validity and predictive ability of the calibration model.

678 *6.2.2 Analysis by the reference method*

679 See Section 4.2.4.

680 The performance of the quantitative NIRS method is dependent on the performance of the reference
681 method. Poor precision and accuracy of the reference method will limit the performance of the NIRS
682 method. The suitability of the reference method should be justified with respect to the intended
683 purpose of the NIRS method. It is important that care is taken to ensure that errors in the reference
684 method are kept as small as practically possible and that appropriate reference standards are employed.

685 Repeated sample analysis by the reference method should be discussed and reference data should be
686 tabulated and presented graphically. The number of replicates to be averaged to provide reference
687 data for the calibration model should be stated and justified with reference to the performance
688 (precision and accuracy) of the reference and NIRS methods.

689 **6.3 Calibration**

690 *6.3.1 Software*

691 Following acquisition of spectral and reference method analytical data of the calibration set of
692 samples, it is necessary to carefully pair and match this data together prior to any chemometric
693 modelling.

694 Using the paired data, the chemometric calibration model should be developed using the specified
695 software package. Such software empirically characterises and correlates the variation within the data
696 to a number of latent variables or factors (also called components).

697 The software can generate a variety of chemometric models, if desired, with differing factors or
698 components, based on the type of model, such as PLS (using factors) and PCR (using components).
699 Sample pre-treatments and other parameters may differ between models. The capability and
700 application of the software used should be fully discussed and explained.

701 6.3.2 *Optimisation*

702 From the chemometric data generated by the software, the selection of the optimum calibration model
703 is a pivotal step in the development of the NIRS method. It is dependent on the judgement and
704 experience of the analyst to make the right choice, taking into account the known spectral behaviour of
705 the analyte and sample matrix, the proposed scope of the method, the iterative nature of NIRS method
706 development and statistical evidence of fitness for purpose.

707 Optimisation of calibration models is performed by ‘internal validation’ or ‘calibration test set
708 validation’ methods as described in Section 6.2.1. These methods are used to aid assessment of the
709 suitability of the calibration model in its ability to predict the correct quantitative result and in its
710 validation.

711 ‘Internal validation’ is the application of resampling statistics such as cross-validation, bootstrapping
712 and leverage correction. In summary, subsets of the calibration set data are subjected to a variety of
713 statistical processes to identify which calibration model may best fit the available data.

714 It is accepted that the use of resampling statistics for this purpose is a rapidly developing field and that
715 more appropriate statistical processes may be possible, particularly relating to assessment of under and
716 over fitting.

717 Each calibration model is characterised by a statistical parameter. For internal (cross) validation
718 methods of optimisation, the characteristic statistic is the ‘Standard Error of Cross Validation
719 (SECV)’.

720 ‘Calibration test set validation’ is the application of the variety of calibration models to a set of
721 samples (for which spectral and reference method data are available), which are drawn from the same
722 population as the calibration set, but not used to generate the calibration model (see Section 6.2.1).
723 The characteristic statistic for this method of optimisation is the ‘Standard Error of Prediction (SEP)’.

724 6.3.3 *Selection of Factors or Components*

725 The number of factors or components to be used in the calibration model is of critical importance to
726 avoid under and over fitting of the data.

727 The scope of the proposed NIRS method and suitability of the calibration samples to adequately
728 represent the product to be marketed should be taken into account when selecting the number of
729 factors or components for inclusion into the calibration model.

730 If the calibration model is over-fitted (too many factors or components used), then it may be over
731 specific to the characteristics of the calibration samples, creating a high risk that out of specification
732 results are obtained for production batches that are fit for marketing.

733 If the calibration model is under-fitted, then the model may not match the intended scope of the NIRS
734 method, having reduced specificity and creating a high risk that results in compliance with the
735 specification are obtained for production batches that are unfit for marketing.

736 The following should be considered when choosing the number of factors or components to use:

- 737
- 738 • Co-linearity
 - 739 • Minimal contribution to the data variance arising from the net signal of the analyte of interest
 - 740 • Contribution to the data variance arising not from the net analyte signal, but from other
components of the sample matrix e.g. excipients or other characteristics.

741 The above list is not exhaustive. The analyst should take into account all relevant issues revealed by
742 the feasibility study and the known nature of the analyte.

743 The rationale for the choice of the chemometric model and the number of factors or components
744 selected for inclusion into the model should be fully discussed and justified. This should include
745 discussion as to why the model may be considered optimal.

746 Once selected, the proposed calibration model should be characterised, by graphical and statistical
747 means. The characteristic statistic being the 'Standard Error of Calibration (SEC)'.

748 *6.3.4 Summary of Data requirements*

749 A summary of the discussion and data to support the calibration model may include:

750 *Software*

751 a) A description of the capability and application of the software used and key statistical
752 parameters used in modelling.

753 *Factors or Components*

754 b) A graphical representation of the variance accounted for by each factor.

755 c) A graphical representation of factor wavelength loadings and their comparison with the net
756 analyte signal or other relevant signals.

757 d) Discussion of the suitability of factors for inclusion into the calibration model.

758 *Optimisation*

759 e) Discussion of the means of optimisation used e.g. using statistical resampling of the same
760 calibration set data or use of the calibration test set (see 6.2.1).

761 f) Plot of SEP (when calibration test set validation is used) or SECV (when internal validation is
762 used), or equivalents, against factors or components, with discussion.

763 *Model*

764 g) Discussion the process for choosing the proposed model.

765 h) Graphical presentation of the calibration curve of NIRS quantitative results against reference
766 method results.

767 The correlation coefficient, calibration equation, slope and intercept, together with an analysis
768 of residuals, as indicators of linearity, should be discussed.

769 i) Determination of the SEC and discussion of its suitability, including comparative SEC data
770 with the other rejected chemometric models, if relevant.

771 Once developed, the calibration model is subject to validation to assess its predictive ability e.g.
772 determination and evaluation of the SEP using an independent validation set (see 6.2.1).

773 **6.4 Validation**

774 *6.4.1 General*

775 See also 4.4.

776 The independent validation set of samples may be supplemented by specially prepared samples to
777 demonstrate linearity, range and specificity (selectivity³).

778 The validation set should be quantitatively characterised by the NIRS and reference methods.

779 Since NIRS analysis relies upon reference data obtained from a primary method or very rarely,
780 samples of known composition in order to impart meaning to the sample spectroscopic data collected,
781 an additional statistical acceptance criterion is used, as a measure of the method's ability to predict the
782 correct quantitative result is required. This is the 'Standard Error of Prediction (SEP)', for the
783 validation set of samples (not to be confused with the SEP for the calibration test set: see also section
784 6.3.2).

785 Validation of quantitative NIRS methods should be demonstrated for the following parameters.

786 6.4.2 *Standard Error of Prediction (SEP)*

787 The SEP should be determined for the validation set and its suitability discussed.

788 This is considered a pivotal statistical parameter.

789 An indication of satisfactory performance for quality control² is given by the following parameters
790 derived from the SEP:

791 Range/SEP-ratio and the Ratio of performance deviation (RPD). If equal to or greater than 10 and 5
792 respectively, then further justification of the suitability of the NIRS method should not be necessary.

793 The SEP should also not be larger than $1.4 \times SEL_{ref}$, unless justified in view of the required accuracy
794 of the test method.

795 6.4.3 *Specificity (Selectivity)*

796 The specificity (selectivity) of an NIRS method is dependent upon the intended purpose, scientific
797 basis and scope (see sections 4.1.1 and 6.1).

798 For specificity (selectivity), the method should be able to reject samples that are outside of its defined
799 scope, such as out of specification product, placebo, samples containing different quantitative
800 composition of proposed excipients, and samples containing different active substance and excipients.

801 The protocol of determining and assuring specificity (selectivity) should be provided together with
802 relevant data.

803 The following may be used to support evidence of specificity:

804 a) Reference to the feasibility study data demonstrating that the suitable NIR response is based
805 on the known NIR characteristics of the analyte (see section 4.1.6).

806 b) Comparison of the wavelength loadings, for the factors used to develop the chemometric
807 model, against the known NIR characteristics of the analyte.

808 c) Validation data to demonstrate accuracy and robustness.

809 6.4.4 *Linearity (correlation with reference data)*

810 To demonstrate linearity, it is required that the validation set samples are distributed across the
811 specified range of interest. Otherwise, linearity cannot be adequately confirmed and validated.

812 The NIRS results should be compared with those of the reference method the correlation coefficient
813 and analysis of residuals (indicators of linearity), should be discussed, and supported by graphical
814 representation.

815 The applicant should justify the choice of statistics applied to determine linearity if these differ from
816 those described.

817 **6.4.5 Range**

818 The range of analyte reference values used to generate the calibration model determines the range of
819 use of the method.

820 The range should be confirmed by use of a suitable validation set which matches in extent the
821 proposed range.

822 Validation set samples having analyte content outside of the calibration range should appear as
823 outliers when tested by the NIRS method (see also specificity).

824 **6.4.6 Accuracy**

825 Accuracy should be established across the specified range of the NIRS method and be comparable
826 with the reference method.

827 The SEP should comply with the requirements given in 6.4.2 above.

828 **6.4.7 Precision**

829 Precision should be comparable with the reference method.

830 The SEP should comply with the requirements given in 6.4.2 above.

831 The suitability of the determined precision should be fully discussed and justified, in the context of the
832 analyte of interest.

833 **Repeatability**

834 Dependent upon the nature of how samples are presented to the NIRS instrument, repeatability should
835 be demonstrated through the analysis of replicate measurements. Repeatability should be
836 demonstrated across the range of sample variation (ideally at three levels).

837 **Intermediate precision**

838 Intermediate precision should be demonstrated by the statistical evaluation of repeatability determined
839 by different analysts over different days.

840 **6.4.8 Robustness**

841 Generally, the reference methods used to generate the primary data for the NIRS methods measure
842 chemical *or* physical properties of samples whereas the vibrational characteristics measured by NIR
843 spectral analysis take into account both physical *and* chemical properties.

844 Evidence to demonstrate the robustness of the NIRS method should therefore cover chemical and
845 physical variables, dependent upon the purpose of the method and the conditions employed for
846 sampling. These variables may include temperature and humidity, sample temperature, sample
847 handling and instrument changes and is discussed in Section 4.1.4 “Elements affecting the Spectral
848 Response”.

849 Furthermore, robustness should be addressed within the scope of the NIRS method (see 4.6). When
850 this is the case, then reference to data generated from the development and optimisation of the
851 calibration model and the validation data described above would be considered sufficient to
852 demonstrate robustness. Otherwise, the protocol of determining and assuring robustness should be
853 provided together with relevant data.

854 **6.4.9 Limits of detection and quantification**

855 Limits of detection and quantification for the proposed NIRS method need only to be demonstrated
856 when relevant and where the analyte is considered an impurity (e.g. water content).

857 These are not required for the determination of content of the drug substance.

858 **7. MATTERS SUBJECT TO GMP**

859 These include:

- 860 • Software validation
- 861 • Training records, expertise and CVs, of NIRS analysts
- 862 • Qualification protocol (according to Ph Eur 2.9.40 requirements), Qualification reports,
863 periodicity of requalification.
- 864 • Planned preventative maintenance and trend analysis.
- 865 • Change control protocol and its application e.g. extension of the calibration model arising from
866 receipt of new batches or manufacture of new batches, change of the spectral library.
- 867 • Change control reports.
- 868 • Out of specification results procedure and recording. For quantitative analysis, it should be
869 confirmed that affected batches were rejected, except in cases of regulatory approval by
870 variation.
- 871 • Maintenance and version control of spectral library
- 872 • SOPs, analytical methods, validation data, supported, if requested, by original dossier
873 submissions.
- 874 • Trend analysis and revalidation data.

875 These records should be kept up to date and be available for inspection.

876 **8. CHANGE CONTROL AND REGULATORY APPROVAL REQUIREMENTS**

877 **8.1 Changes to approved NIRS methods**

878 All changes should be appropriately documented and recorded; according to approved change control
879 protocols (see section 4.5).

880 In general, changes within the scope of the NIRS method should be subject to GMP inspection only.
881 Relevant examples include the maintenance of the spectral library, replacement of equipment and
882 other consumables with the same, including lamps, sampling devices, location and software upgrades.

883 To enable the dossier to be updated, extensions beyond the approved scope of the NIRS method
884 should be subject to variation. Submissions for these changes should comply with this guidance note,
885 including an appropriate comparability report.

886 For extensions of the scope of a qualitative NIRS method e.g. to include a new substance, then a
887 statement of compliance with this guidance note and a summary comparability report would be
888 considered sufficient.

889 Significant extensions would require assessment and would apply mainly to quantitative analysis.

890 In light of the proposed published changes to the Variations Regulation, specific advice should be
891 obtained from Competent Authorities, pending publication of further guidance.

892 **8.2 *Method Transfer between NIRS Instruments***

893 The aim of method transfer is to ensure that the calibration model generated on one NIRS instrument
894 will work on another instrument. Samples analysed on the original 'master' instrument should give
895 equivalent results on all additional instruments to which the calibration model is transferred. The
896 NIRS calibration model should be demonstrated to be fit for purpose on both instruments.

897 The ideal approach to method transfer between NIRS instruments is to set up a global calibration
898 model at initial registration, by including all potential instruments in the defined scope of the method.
899 In such a case, all samples would be analysed using all instruments and all spectral data included in
900 the calibration model. Once a calibration model is established, method transfer is likely to become
901 progressively more difficult to achieve as more instruments are added.

902 One of the main problems with method transfer is a lack of uniformity of sample presentation. This is
903 more of a problem with solid samples, for which sample orientation is critical. Different instruments
904 will have different sample holders as well as different arrangements of detectors, which will contribute
905 to the difficulties in achieving method transfer.

906 There are several commercial software packages that may be used for method transfer of NIRS
907 models. These correct for differences in the ceramic reference standards of different instruments and
908 perform statistical analysis of differences between results obtained. If method transfer is performed,
909 details of the software used and the basis of the analysis performed should be given.

910 Method transfer of one NIRS calibration model to another would be the subject of a variation
911 requiring assessment. The size of the transfer set of samples used to demonstrate the equivalence of
912 the data generated on both instruments should be given and justified. The sample set should cover the
913 full range of variation in the scope of the method.

914 At present, calibration transfer between NIR instruments is not considered well established and it is
915 recommended that calibration and validation are repeated on the new instrument.

916 **8.3 *New NIRS applications for approved marketing authorisations***

917 All new NIRS applications should comply with this guideline, however, the data to be submitted to
918 competent authorities may be less extensive than described for non-critical applications, if the
919 technique is well established at the testing site.

920 For example, for certain applications e.g. the use of NIRS as qualitative method for colouring
921 materials and plastic primary packaging materials, it may be sufficient to submit a declaration that:

- 922 a) The NIRS method has been validated in conformity with this guideline.
- 923 b) NIRS is well established at the site (cross-referring to other marketing authorisations, as
924 appropriate) and is subject to regular GMP inspection.

925 **DEFINITIONS**

Ambiguous conclusion	The sample is considered identical to more than one entity present in the reference library
Bias (mean of the errors)	<p>A statistic measuring the mean of the errors between the NIRS and reference method quantitative analyte values</p> $Bias = \frac{\sum_{i=1}^n (y_i - Y_i)}{n}$ <p style="text-align: right;"> <i>Y</i> = NIRS predicted value <i>y</i> = reference method value <i>n</i> = number of samples </p>
Bootstrapping	In principle bootstrapping methods estimate the prediction error by using <i>n</i> observations with replacement from a data set with <i>n</i> samples. The average prediction ability of the samples is computed by fitting a regression model. This is repeated very often (e.g. more than 1000 times) and then the average prediction error is computed
Calibration	The process of creating a model relating two types of measured data; for NIRS methods a model that relates concentrations or properties to absorbance spectra for a set of reference samples (the reference library or the calibration set)
Calibration set	The set of samples used for creating the calibration model
Calibration Test Set	The set of samples, which are drawn from the same population as the calibration set, but were not used to generate the calibration model. In practice, the calibration set often consists of two thirds of the available sample population. The calibration test set is the remaining third
Calibration test set validation	The application of possible chemometric calibration models to the calibration test set. The derived characteristic statistical parameter is the ‘Standard Error of Prediction (SEP)’
Change control protocol	A protocol listing potential future changes in the method and the actions considered necessary to prove the maintained reliability of the method
Change control test	Test used to demonstrate unchanged method reliability following a change in a method
Chemometrics	Mathematical multivariate methods to analyse or compare data
Cross-Validation	Statistical practice of partitioning a sample set into subsets such that the regression is initially performed on a single subset (calibration or training set), while the other subset (validation or testing set) are retained for subsequent use in confirming and validating the initial regression equation
Conformity	Characteristics in accordance with a certain degree of similarity (chemical and/or physical entities) to some specified standard
Factor	See Latent variable
Factorial experimental design	Two or more treatments are evaluated simultaneously in the same set of subjects through the use of varying combinations of the treatments. The simplest example is the 2×2 factorial design in which the parameters are randomly allocated to one of the four possible combinations of two treatments. Such an experiment allows studying the effect of each factor on the response variable, as well as

	the effects of interactions between factors on the response variable
Identification	Determination of the chemical identity
Internal validation	The application of resampling statistics such as cross-validation, bootstrapping and leverage correction. In summary, subsets of the calibration set data are subjected to a variety of statistical processes to identify which calibration model may best fit the available data. Each model is characterised by a statistical parameter. For cross-validation, the entire data set of samples is split into individual samples or groups of samples, which are removed individually from the rest of the samples and tested as unknowns against a calibration model constructed using the rest of the samples. The characteristic statistic is the 'Standard Error of Cross Validation (SECV)'
Latent variable or factor	Chemometric software by means of empirical correlation, when constrained by a set of calibration reference data reduce the variances in the NIRS signals to a set of functions, arbitrary generated, which are called latent variables (e.g. principle components) or factors. Inspection of the wavelength loadings of these factors should show how they contribute to the variance arising from the net analyte signal
Leverage	In chemometrics the leverage is a concept related to the Mahalanobis distance and is used to measure the influence of a sample in a model based on its similarity to the rest of the population. The Mahalanobis distance takes into account the correlations of the data set and is scale-invariant, i.e. not dependent on the scale of measurements. The leverage of a sample is the distance to the centre of all samples relative to the variability in its particular direction
No match conclusion	The sample is not considered identical to any entity in the reference library
Pass conclusion	The sample is considered identical to an entity in the reference library
PCA	Principal Component Analysis
PCR	Principal Component Regression
Performance verifications	Tests to control the instrument performance
PLS (PLSR)	Partial Least Squares (Regression)
Pre-treatment	Processing of the spectral data, with mathematical or other techniques, prior to chemometric analysis
Process Analytical Technology (PAT)	A system for analysing and controlling manufacture through timely measurements (i.e. during processing) of critical quality and performance attributes of raw and in-process materials and processes with the goal of ensuring final product quality. PAT is the sum of tools that allows enhanced control of manufacturing process, can improve process understanding and so facilitates building quality into products
Qualification	1. Characterisation based upon chemical- and physical attributes. 2. Determination of the chemical identity and the variability of the sample to the chosen model and the variability included
Qualitative method	Method with a yes or no result, e.g. identity
Quantitative method	Methods with a numerical result, e.g. assay

Ratio of performance deviation (RPD) A statistic measuring the ratio of the standard deviation of the reference values of the calibration set (SD_{ref}) and the Standard Error of Prediction (SEP)

$$RPD = \frac{SD_{ref}}{SEP}$$

Reference library (spectral reference library) Database containing spectra of several batches of several substances to be tested. Spectra of unknown samples are compared with this database

Reference method The conventional analytical method that is used to determine the concentration or property value of the samples

Resampling Statistics Statistical methods to aid the optimisation of the calibration model by using subsets of the calibration set, e.g. cross-validation, bootstrapping, leverage correction

SEC See Standard Error of Calibration

SECV See Standard Error of Cross-Validation

SEL See Standard Error of Laboratory

Selectivity In the context of this Note for Guidance, a characterization of how selective the method is in recognizing that the sample is within the defined scope of the NIRS method. High selectivity is representative of specificity

SEP See Standard Error of Prediction

Standard Addition The uniform addition of the analyte the sample matrix, to enhance the net analyte NIR signal, in a controlled and understood manner

Standard Deviation (SD_{ref})

$$SD_{ref} = \sqrt{\frac{\sum_{i=1}^n (y_{mean} - Y_i)^2}{n-1}}$$

y = reference method value
 y_{mean} = arithmetic mean of the reference method values

Standard Error of Calibration (SEC) A statistic measuring the difference between the NIRS and reference method quantitative analyte values of the calibration set

$$SEC = \sqrt{\frac{\sum_{i=1}^n (y_{C,i} - Y_{C,i})^2}{n-p}}$$

Y_C = NIRS predicted value of calibration set
 y_C = reference method value of calibration set
 n = number of samples
 p = number of coefficients, e.g. wavelength (MLR), principal components (PCR), factors (PLS)

Standard Error of Cross-Validation (SECV) A statistic measuring the difference between the NIRS and reference method quantitative analyte values of the calibration set using a cross-validation method (e. g. Leave-One-Out-Method)

$$SECV = \sqrt{\frac{\sum_{i=1}^n (y_{CV,i} - Y_{CV,i})^2}{n}}$$

Y_{CV} = NIRS predicted value
 y_{CV} = reference method value
 n = number of samples

Standard Error of Laboratory (SEL) The SEL concerns to the intermediate precision (intra-lab) or reproducibility (inter-lab), whichever is applicable

$$SEL = \sqrt{\frac{\sum_{i=1}^n (y_{1,i} - y_{2,i})^2}{n}}$$

$y_{1/2}$ = reference method value measured at different laboratory conditions
 n = number of samples

Standard Error of Prediction (SEP) A statistic measuring the difference between the NIRS and reference method quantitative analyte values of the calibration test set and the independent validation set. The SEP derived from the independent validation set is considered a pivotal statistical parameter. An indication of satisfactory method performance for quality control is

given by: $\frac{Range}{SEP} \geq 10$

$$SEP = \sqrt{\frac{\sum_{i=1}^n (y_{V,i} - Y_{V,i})^2}{n}}$$

Y_v = NIRS predicted value
 y_v = reference method value
 n = number of samples

Threshold Limiting value, for qualitative methods, decisive for a “pass” or a “no match” conclusion

Training set The set of samples, included in the reference library, that concern the same entity (substance or property value)

Validation set Set of samples used in validating the model

Wavelength Correlation The correlation between spectra, i.e. the sum of the individual correlation of absorbances of each included wavelength

Wavelength loadings Plots of wavelengths against intensity for each derived factor of the calibration model. Such plots show the wavelengths at which the spectral variance, modelled by the specific factor or component, occurs. The wavelength loading plots indicate the parts of the spectrum that are responsible for the differences between samples explained by a particular factor or component. These can be compared with known net signal of the analyte of interest to determine if the factor significantly models the analyte signal and should be included in the chemometric model

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