

**PHARMACOPOEIAL DISCUSSION GROUP**

**SIGN-OFF DOCUMENT**

**WORKING PROCEDURE OF THE  
PHARMACOPOEIAL DISCUSSION GROUP (PDG)**

Revised version 5 corrected (February 2025)

**European Pharmacopoeia**

Signature

Name

Date

Signé par :  
  
5D202E6E19D1466...

C. Vielle

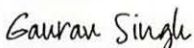
18 Feb. 2025

**Indian Pharmacopoeia Commission**

Signature

Name

Date

Signed by:  
  
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Gaurav Pratap Singh

20 Feb, 2025

**Japanese Pharmacopoeia**

Signature

Name

Date

  
for K. Nakai

Yoshitro Saito

22 March, 2025

**United States Pharmacopoeia**

Signature

Name

Date

Signed by:  
  
A7467E52FCC94E9...

Kevin Moore

2/19/2025

1                                   **WORKING PROCEDURES OF THE**  
2                                   **PHARMACOPOEIAL DISCUSSION GROUP (PDG)**  
3                                   Revised version 5 corrected, dated February 2025

4

5   **General**

6   Harmonisation may be carried out retrospectively for existing monographs or chapters or  
7   prospectively for new monographs or chapters.

8   The PDG pharmacopoeias have a commitment to respecting the agreed working procedures  
9   and the associated time deadlines as an essential part of the harmonisation procedure.

10   Harmonisation of pharmacopoeial documents in the PDG occur based on decisions of the  
11   expert bodies of each pharmacopoeia. The PDG works transparently in many ways, including,  
12   principally, the public notice and comment procedures of each pharmacopoeia.

13   Where necessary, meetings of experts including technical teleconference/videoconference  
14   meetings are held to identify potential solutions to resolve difficult problems.

15   Sign-off can occur either electronically, by email, by mail, or during the PDG meeting. The  
16   specific stages of the Pre-PDG and PDG Procedure (Process) involved in harmonisation are:

17   **Pre-PDG**

18   PDG identifies subjects to be harmonised among PDG pharmacopoeias and nominates a  
19   coordinating pharmacopoeia (CP) for each subject. The subject can include potential new  
20   topics, as well as revisions to existing topics to the PDG workplan. The Pre-PDG step provides  
21   a pipeline of potential topics/request for revisions to the PDG Work Plan.

22       • New topic: for a subject to be harmonised the CP develops a clear concept written  
23       document, scientific rationale, including Stakeholder input, impact and perspective.  
24       The CP will coordinate with the other PDG pharmacopoeias, determine impact of local  
25       requirements and barriers to harmonization and utilize technical teleconferences if  
26       needed (limited to 3 experts per pharmacopoeia). PDG decides on an  
27       approve/disapprove decision whether to add a new topic to the PDG workplan and on  
28       the agreed upon timeframe. Subject should be considered for removal after 12 months  
29       if no agreement is reached.

30       • Requests for revision: following coordination with the Experts from the PDG  
31       pharmacopoeias, PDG decides on an approve/disapprove decision whether to add a  
32       revision to the PDG workplan. Subject should be considered for removal after 12  
33       months if no agreement is reached.

34   **PDG approval**

35   Once a topic/request for revision is added to the PDG workplan, the PDG pharmacopoeias  
36   strive not to revise their national (regional) text unilaterally, with the understanding that each  
37   pharmacopoeia would notify PDG of any required changes to local or regional text stemming  
38   from regulations and policy that will have impact on the harmonised text moving forward.

39   **Stage 1: Preparation of first draft**

1 Upon PDG approval to add the topic/request for revision to the workplan, the CP prepares and  
2 forwards the Stage 1 draft and supporting data to PDG for pharmacopoeial expert committee  
3 review/comment within the timeframe as proposed in the Concept Paper. The Stage 1 draft  
4 explains the reasons for each test method or limit proposed.

5 Each Pharmacopoeia shall provide feedback or rationale through consultation with experts or  
6 governing body within 3 months. The comment period should, however, not exceed 4 months.  
7 Each pharmacopoeia should consolidate their comments and forward to the CP.

8 The CP reviews the comments received and makes an initial go/no go decision on whether  
9 the proposed harmonised draft document can move on for public comment / inquiry (Stage 2  
10 draft). If the initial CP decision is "go", the Stage 2 draft is prepared as close as possible to  
11 "global style," together with the commentary and sent to the secretariats of the other  
12 pharmacopoeias.

13 The other pharmacopoeia's commit to providing a response within one month whether they  
14 can agree to publish the draft for public comment/inquiry. If all pharmacopoeias agree the  
15 decision is a "go," the draft moves forward for public comment/inquiry.

16 If the decision by one or more pharmacopoeias is "no go", additional teleconferences may be  
17 held (limited to 3 experts per pharmacopoeia) to resolve "sticking points." Ideally, these  
18 teleconferences will be held within 1-2 months of the decision to "no go". The goal of these  
19 teleconferences will be to either successfully commit to publish a Stage 2 draft, determine  
20 necessary next steps to reach Stage 2 (e.g. obtaining sponsor data, development and  
21 validation of analytical methods, etc.), or remove the topic from the PDG workplan (see  
22 Suppression).

### 23 **Stage 2: Official Inquiry**

24 The Stage 2 draft and the commentary are published in the respective fora of each  
25 pharmacopoeia. The draft proposal is published in its entirety and shared by the CP with all  
26 interested world pharmacopoeias after publication. Comments will be considered during the  
27 stage 2 phase. The style may be adapted to that of the individual pharmacopoeia concerned  
28 or the "global style" may be used. The pharmacopoeias commit to publish the drafts  
29 simultaneously or as closely as possible.

The corresponding secretariats may have to add information needed for the understanding of implementation of the texts, e.g., the addition of the description of an analytical procedure or of reagents that do not exist in the pharmacopoeia and a translation is added by the European and Japanese Pharmacopoeias.

30 Each pharmacopoeia analyses the comments received and submits its consolidated  
31 comments to the CP within 2 months of the end of the review/comment period.

32 The CP reviews the comments received. If the comments received during the public  
33 comment/inquiry stage are significant enough to preclude a reasonable chance to reach  
34 consensus at Stage 3, the CP will determine the appropriate course of action, with consultation  
35 of the other PDG pharmacopoeias. Otherwise, the CP prepares a draft harmonised document  
36 (Stage 3A draft) accompanied by a commentary discussing comments received regarding  
37 the previous text and providing reasons for action taken in response to those comments. When  
38 residual differences are anticipated for sign-off, the stage 3A draft includes a draft of the sign-  
39 off cover sheet (see below).

40 The Stage 3A draft together with the commentary is sent to the other PDG pharmacopoeias.

**1 Stage 3: Consensus****2 A. Provisional**

3 The stage 3A draft is reviewed and commented on by the other PDG pharmacopoeias within  
4 2 months of receipt. The PDG pharmacopoeias shall do their utmost to reach full agreement  
5 already at this stage with a view to reaching a final consensus document.

6 If a consensus has not been reached, the CP prepares a pharmacopoeia teleconference within  
7 2 months to discuss remaining residual differences brought up through the public  
8 comment/inquiry period. The purpose of the pharmacopoeia teleconference is to make  
9 decisions on the remaining differences and whether they can be resolved, assigned as non-  
10 harmonised attributes or local requirements, if re-publication is necessary at Stage 2, or in  
11 extreme circumstances, remove from the workplan.

12 A sign-off cover sheet (see Appendixes 1 and 2) indicating harmonisation is included with the  
13 draft. The text contains only harmonised attributes/provisions; non-harmonised  
14 attributes/provisions and local requirements are not included. The table is prepared as follows:

15 - all pharmacopoeias agree on the attribute/provision: '+' in all columns

16 - at least 2 pharmacopoeias agree that the attribute/provision should be included and have  
17 agreed on the method and limit: '+' in the column for those pharmacopoeias, '-' in the  
18 column for the pharmacopoeia(s) that will not stipulate the test

19 - all pharmacopoeias agree that the attribute/provision should be included but have not  
20 come to an agreement on the method and/or limit: state attribute/provision under 'Non-  
21 harmonised attributes/provisions'

22 - 1 pharmacopoeia only will include an attribute/provision: state under 'local requirement'.

23 The CP collects information about needs for amendments (local requirements) corresponding  
24 to a general policy in the national or regional (European) area. Local requirements, if needed,  
25 will be listed on the sign-off cover sheet.

**26 B. Draft sign-off**

27 When full agreement is reached, the stage 3B draft is sent by the CP to the other  
28 pharmacopoeias for final confirmation. In case of electronic signing or by correspondence the  
29 other pharmacopoeias reply to the draft within 1 month, if tabled at a PDG meeting the draft is  
30 sent no later than 1 month before. Sign-off on stage 3B can occur either electronically, by  
31 email, by mail, or during the PDG meeting.

32 The CP shares the final sign-off document with all interested world pharmacopoeias which  
33 may implement the text following Good Pharmacopoeial Practices.

## 1 **Stage 4: Regional adoption and implementation**

2 Stage 4 takes place individually according to the procedures established by each  
3 pharmacopoeial organisation.

### 4 A. Adoption and publication

5 The document is submitted for adoption to the organisation responsible for each  
6 pharmacopoeia. Each pharmacopoeia incorporates the harmonised draft according to its own  
7 procedure.

8 If a pharmacopoeia needs to include a local requirement after the sign-off of a text, it will submit  
9 a proposed revision of the sign-off cover sheet to PDG (see below).

### 10 B. Implementation

11 The pharmacopoeias will inform each other of the date of implementation in the particular  
12 region.

13 The date of implementation of a harmonised document varies in the PDG regions depending  
14 on their legal requirements, need of translation, and publication schedules. Each  
15 pharmacopoeia generally allows some period of time after publication for implementation, to  
16 allow manufacturers and other users to achieve conformity.

### 17 C. Indication of harmonisation

18 Each pharmacopoeia will introduce a statement indicating the harmonisation status according  
19 to the policy of the pharmacopoeia. In case of residual differences, these are indicated by  
20 specific symbols (black diamonds indicate non-harmonised attributes/provisions, white  
21 diamonds indicate local requirements). The residual differences all correspond to differences  
22 that have been agreed upon by PDG, via the sign-off cover sheet.

## 23 **Stage 5: Inter-regional acceptance (for chapters previously evaluated by ICH Q4B for 24 Regulatory Interchangeability)**

25 16 chapters were evaluated by the ICH Q4B Expert Working Group. Following the Q4B  
26 evaluation process, a formal notification of regulatory acceptance was posted on the ICH  
27 website.

28 A topic-specific annex to Q4B guideline for each monograph or chapter concerned is  
29 processed for publishing and implementation by each regional authority.

30 Details of the maintenance of the Q4B guideline and its annexes by the PDG are captured in  
31 the respective ICH documents.

## 32 **Revision**

33 Procedure for the revision of harmonised monographs and chapters

34 The pharmacopoeias participating in the PDG have agreed not to unilaterally revise any  
35 harmonised document (monograph or chapter) after it has been signed-off or published.

1 A pharmacopoeia requesting the revision of a monograph or chapter must provide the PDG  
2 with a formal request including a rationale for revision and appropriate supportive data.  
3 The PDG as a whole – instead of an individual pharmacopoeia – may also request a revision.

4 Criteria for justification of revision may include but are not limited to:

- 5 - public health and safety reasons;
- 6 - insufficient supply of pharmacopoeial quality product on the market;
- 7 - specified analytical reagents or equipment are not available;
- 8 - new methods of preparation of product/reagent are not covered by the current  
9 monograph;
- 10 - analytical methods can be replaced by more appropriate/accurate/precise methods;
- 11 - new technologies that are suitable to be included in the pharmacopoeias.

12 The process for revisions follows the Working Procedure of the PDG as described above under  
13 "Pre-PDG". Revisions of a sign-off document are indicated as revision 1, 2, 3, etc., for the sake  
14 of consistency.

15 Whenever agreed by the PDG, an expedited procedure may be followed. In certain  
16 circumstances, where appropriately justified, the expedited procedure would result in a revision  
17 reverting to Stage 3A as opposed to Stage 1. In these instances, the pharmacopoeia  
18 requesting the revision of a monograph or chapter using the expedited procedure submits a  
19 formal request for revision, including, in addition to the information supplied in the normal  
20 revision process, a justification for recommending the expedited procedure. Agreement by  
21 the PDG to the expedited procedure is handled on a case-by-case basis. After the PDG gives  
22 the green light for the revision, the CP may proceed directly with the elaboration of a Stage 3A  
23 draft.

24 If, for public health reasons, there is an urgent need to rapidly update a harmonised PDG  
25 standard, a PDG pharmacopoeia may, with the agreement of the other PDG pharmacopoeias,  
26 unilaterally introduce local requirements to address that need, while simultaneously proposing  
27 a revision through the PDG working procedure as described.

28 Revisions to texts that have already been harmonised can further be introduced as local  
29 requirement if, after consultation with all the parties, there is no consensus for the proposed  
30 revision.

31 Any proposal for introduction of local attributes, together with an assessment of the impact on  
32 the harmonisation status of the text, will be communicated to the other pharmacopoeias. If any  
33 of the other pharmacopoeias disagrees with such a deviation from the PDG's Working  
34 Procedure or the assessment shows that the harmonisation status is largely affected, this may  
35 result in suppression of the text from the work plan (see Suppression).

## 1 **Suppression**

2 An item can be proposed for suppression from the work programme when one or more  
3 pharmacopoeia(s) wishes to withdraw from harmonisation of a topic. Reasons for withdrawal  
4 include the intention to revise when there is no possibility of agreement being reached by  
5 the PDG or when no progress has been made on a topic by the PDG for more than 3 years,  
6 and no path forward could be agreed.

7 Proposals for suppression are submitted no later than 4 weeks before a PDG meeting together  
8 with the reasons justifying the request. Following a decision by the PDG, each pharmacopoeia  
9 provides the information on suppression of the topic to its stakeholders. If a pharmacopoeia  
10 unilaterally decides to revise a previously harmonised text, its stakeholders are informed via  
11 the pharmacopoeia's forum or website during the official inquiry and the decision of this  
12 pharmacopoeia to move forward with the revision is based on the feedback received.

13 Any of the pharmacopoeias unilaterally introducing a subsequent revision of a text that was  
14 previously harmonised through PDG would clearly inform their respective stakeholders about  
15 the status change.

16 The other pharmacopoeias may continue working bilaterally on any topic outside PDG.

## 17 **Correction of a sign-off text**

18 Any pharmacopoeia which has identified an error in a sign-off text may submit a request for  
19 correction to PDG together with appropriate justification. A cover sheet (see Appendix 3) is  
20 prepared by the pharmacopoeia requesting the correction, together with appropriate  
21 justification. The cover sheet includes the name and code of the general chapter or  
22 monograph, the date of the sign-off and the description of the correction. After confirmation by  
23 PDG, the text is signed-off.

## 24 **Revised version of a sign-off cover sheet**

25 Any pharmacopoeia which has identified a need for a modification of a sign-off cover sheet will  
26 inform PDG accordingly, together with appropriate justification. Reasons include  
27 implementation by a new PDG member, addition of a new local requirement or a revision of a  
28 local requirement/non-harmonised attribute already included in a previously signed-off cover  
29 sheet. When needed for clarity purposes, the pharmacopoeia provides PDG with a full text  
30 including the new/corrected local requirement/non-harmonised attribute or with the published  
31 or drafted local text, if available. A new version of the cover sheet (see Appendix 4) is prepared  
32 by the pharmacopoeia requesting the revision. The cover sheet includes the name and code  
33 of the general chapter or monograph, the date of the sign-off and the description of the change  
34 like new sign-off or new/revised local requirement/non-harmonised attribute with tracked  
35 changes. After agreement by PDG, e.g. that this is a local requirement/non-harmonised  
36 attribute, the new version of the cover sheet, if needed with the text, is signed-off.

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**Appendix 1**  
**PHARMACOPOEIAL DISCUSSION GROUP**

**SIGN-OFF DOCUMENT**  
**CODE: ...(General chapter)**  
**NAME: ... (General chapter)**

6 *It is understood that sign-off covers the technical content of the draft and each party will*  
7 *adapt it as necessary to conform to the usual presentation of the pharmacopoeia in question;*  
8 *such adaptation includes stipulation of the particular pharmacopoeia's reference materials*  
9 *and general chapters.*

10 **Harmonised provisions:**

Provision	EP	IP	JP	USP
Introduction	+		+	+
...	+		+	+
...	+		+	+
...	+		-	+

11 **Non-harmonised provisions:**

- 12 1)  
13 2)

14 **Local requirements**

15

<b>EP</b>	
<b>IP</b>	
<b>JP</b>	
<b>USP</b>	

16

17 **European Pharmacopoeia**

18 Signature Name Date

**Indian Pharmacopoeia Commission**

Signature Name Date

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PDG working procedure

February 2025

1 **Japanese Pharmacopoeia**

2 Signature Name Date

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5 **United States Pharmacopeia**

6 Signature Name Date

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**Appendix 2**

**PHARMACOPOEIAL DISCUSSION GROUP**

**SIGN-OFF DOCUMENT**  
**CODE: ... (Monograph)**  
**NAME: ...(Monograph)**

**Harmonised attributes:**

Attribute	EP	IP	JP	USP
Definition	+		+	+
Identification	+		+	+
...	+		+	+

**Legend**  
 +: will adopt and implement  
 -: will not stipulate

**Non-harmonised attributes:**  
 ...

**Local requirements**

EP	
IP	
JP	
USP	

**Reagents and reference materials**

Each pharmacopoeia will adapt the text to take account of local reference materials and reagent specifications.

[if applicable:] Each pharmacopoeia will consider actual titrant concentration in equations according to the local rules of calculation for titration.

**European Pharmacopoeia**

Signature Name Date

**Indian Pharmacopoeia Commission**

Signature Name Date

PDG working procedure

February 2025

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2 **Japanese Pharmacopoeia**

3 Signature Name Date

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6 **United States Pharmacopeia**

7 Signature Name Date

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**Appendix 3**

**PHARMACOPOEIAL DISCUSSION GROUP**

**CORRECTION**

**CODE: ... (General Chapter or Monograph)**  
**NAME: ... (General Chapter or Monograph)**  
**(Correction X of the sign-off document ... signed on ...)**

Item to be corrected: ...

[reproduce complete sign-off cover sheet and attach full text]

**European Pharmacopoeia**

Signature	Name	Date
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**Indian Pharmacopoeia Commission**

Signature	Name	Date
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**Japanese Pharmacopoeia**

Signature	Name	Date
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**United States Pharmacopoeia**

Signature	Name	Date
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**Appendix 4**

**PHARMACOPOEIAL DISCUSSION GROUP**

**SIGN-OFF COVER SHEET**

**CODE: ... (General Chapter or Monograph)**  
**NAME: ... (General Chapter or Monograph)**  
**(Version X of the sign-off cover sheet to ... signed on ...)**

Amended Item: [...]

[include complete corrected sign-off cover sheet and attach full text, if needed]

**European Pharmacopoeia**

Signature	Name	Date
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**Indian Pharmacopoeia Commission**

Signature	Name	Date
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**Japanese Pharmacopoeia**

Signature	Name	Date
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**United States Pharmacopeia**

Signature	Name	Date
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