



Role of CAPA in Maintaining Pharmaceutical Product Quality

Ajinkya V. Malusare^{*1}, Suchita. S. Mane², Archana. M. Karnik³, Vaishnavi. A. Kuthe⁴

¹ Scholar, Department of Quality Assurance, Indira School of Pharmacy, Pune, India.

² Scholar, Department of Quality Assurance, Indira School of Pharmacy, Pune, India.

³ Associate Professor, Department of Pharmaceutical Quality Assurance, School of Pharmacy, Indira University (formerly SCES's Indira College of Pharmacy), Pune, India.

⁴ Assistant Professor, Department of Pharmaceutical Chemistry, Indira School of Pharmacy, Pune, India.

*Corresponding author's E-mail: ajinkyamalusare6000@gmail.com

Received: 15-05-2026; Revised: 24-07-2026; Accepted: 30-07-2026; Published online: 20-08-2026.

ABSTRACT

Corrective and Preventive Actions (CAPA) forms one of the key components of Pharmaceutical Quality Systems (PQS). CAPA is concerned with the identification, investigation, and elimination of the causes of any deviations and risks. CAPA aims at continuous improvement in the manufacturing process and quality control. The concept of CAPA incorporates all the key elements of root cause analysis, risk assessment, and quality assurance. The role of CAPA is emphasized by regulatory agencies like US FDA, ICH, WHO, and EU GMPs for effective compliance systems. The current review highlights the aspects associated with the concept of CAPA.

Keywords: CAPA, Pharmaceutical Quality System, GMP, Root Cause Analysis, Quality Assurance, ICH Q10.

INTRODUCTION

The pharmaceutical industry functions in one of the most highly regulated and scientifically challenging industrial settings due to the direct impact of pharmaceuticals on the health status, medical results, and patients' lives. While regular manufacturing involves less strict controls, pharmaceutical production demands rigorous consistence and observance of quality criteria during the whole life cycle of a product. Small deviations from the composition, production conditions, environment, packaging, and analytical methods have a serious impact on the safety, efficiency, and stability of drugs. Consequently, product consistence becomes an obligation for pharmaceutical producers. In order to guarantee consistent compliance of the pharmaceutical products with the predetermined standards of identity, purity, potency, and safety, the global regulatory authorities insist on the implementation of Pharmaceutical Quality Systems (PQS) through adherence to Good Manufacturing Practices (GMPs), quality risk management practices, and continuous improvement practices.

The notion of the Pharmaceutical Quality System was further developed by means of the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) guideline Q10, which set out a harmonized concept for pharmaceutical quality management throughout the lifecycle of the product. In its turn, the ICH Q10 guideline incorporates scientific aspects of GMP, risk management practices as outlined in ICH Q9, process performance and control and knowledge management in pharmaceutical quality management system. Finally, it should be highlighted that the ultimate goal of Pharmaceutical Quality Systems is the assurance of intrinsic quality of pharmaceutical products right from their developmental stage and not just through final product

tests¹. In this quality system framework that is tightly woven, Corrective and Preventive Actions (CAPA) stands out as the most important component in pharmaceutical quality management. CAPA stands for a systematic approach to quality problems where root cause investigations are performed and solutions to existing deviations are found as well as preventive measures are put in place in order to prevent re-occurrence of the deviation. The CAPA process is more than just documenting, it involves science-driven quality management which turns quality deviations into opportunities for improvement. CAPA system serves as the feedback mechanism in the pharmaceutical quality system ensuring that all deviations, complaints, audit observations, laboratory, equipment, or process deviations are investigated and fixed at their source².

Traditionally, pharmaceutical companies had been employing reactive techniques in quality management wherein individual corrections were made without an in-depth investigation into the root causes of deviations. These practices often led to failure, recurrence of deviations, violations, and increased recall of products. CAPA systems have revolutionized this practice by transforming pharmaceutical quality management from reactive solutions to preventative solutions and predictive quality assurance. By using CAPA techniques, not only problems can be solved, but even areas that are prone to failure can be identified, which helps in taking precautionary measures in advance³. In recent times, there has been more focus on the effectiveness of CAPAs from global regulators like US FDA, EMA, WHO, and even local regulatory bodies. Observations by various regulatory bodies have shown time and again that poor CAPA systems form one of the most frequent reasons for warnings and other actions such as recalls or suspension of operations. Thus, pharma organizations are not only looking at CAPAs as mere regulatory requirements but as effective tools to ensure quality that affects their



reputation and competitiveness⁴. The significance of CAPA has further increased due to the advent of modern-day pharmaceutical techniques like continuous manufacturing, production of biologics, personalized medicine, and data-enabled quality systems.

The more sophisticated pharmaceutical manufacturing operations have become, the more the need for CAPA systems that are designed to cope with multi-dimensional risk assessments, huge quality data, and multiple manufacturing parameters involved. Digital technologies like eQMS, artificial intelligence (AI), machine learning (ML), predictive analytics, and real-time monitoring devices are making CAPA a predictive quality management system that can detect possible quality risks even before their occurrence⁵. Therefore, CAPA has evolved to become a key component of modern Pharmaceutical Quality Systems, as it incorporates science, regulation, risk, optimization, and continuous improvement in its quality system approach. The success of CAPA is responsible for the level of maturity, robustness, and sustainability of pharmaceutical quality systems while guaranteeing that pharmaceutical products are in line with regulatory expectations.

Pharmaceutical Quality Systems (PQS)

The Pharmaceutical Quality System (PQS) is a comprehensive framework that ensures pharmaceutical products consistently meet predefined quality, safety, and efficacy requirements throughout their lifecycle. The concept is formally described in the ICH Q10 guideline, which integrates Good Manufacturing Practices (GMP), quality risk management, and pharmaceutical development into a unified quality management approach.^[6] Unlike traditional quality systems that primarily rely on end-product testing, PQS emphasizes building quality into products and processes through scientific understanding, risk-based decision-making, and continual improvement.^{6,7} A key feature of PQS is its lifecycle approach, which extends from pharmaceutical development through technology transfer, commercial manufacturing, and product discontinuation. During development, manufacturers identify critical quality attributes (CQAs), critical material attributes (CMAs), and critical process parameters (CPPs) that influence product quality. This knowledge forms the basis for establishing robust manufacturing processes and effective control strategies.⁷

Continuous monitoring throughout the product lifecycle enables organizations to maintain process consistency and ensure compliance with regulatory expectations⁶. The effectiveness of PQS depends on several interconnected elements, including management responsibility, process performance monitoring, CAPA, change management, deviation management, training, supplier qualification, equipment management, and documentation systems⁶. Senior management plays a crucial role in establishing quality objectives, allocating resources, and fostering a culture of quality and compliance. Strong management commitment has been identified as a critical factor in achieving sustainable quality performance and regulatory

compliance¹². Process performance and product quality monitoring constitute another essential component of PQS. Continuous collection and evaluation of manufacturing and quality data facilitate early identification of trends, deviations, and process variability. Such proactive monitoring supports informed decision-making and enables timely interventions before product quality is compromised^{6,8}.

The integration of risk management principles, as described in ICH Q9, further strengthens the ability of pharmaceutical organizations to identify, assess, and control quality-related risks throughout the product lifecycle⁸. Corrective and Preventive Action (CAPA) represents one of the most significant elements within PQS. CAPA serves as a systematic mechanism for investigating quality issues, identifying root causes, implementing corrective measures, and preventing recurrence⁹. Data generated from deviations, complaints, out-of-specification (OOS) results, audit findings, and equipment failures provide valuable inputs for CAPA investigations. Effective CAPA implementation transforms quality data into actionable improvements and contributes directly to organizational learning and continuous quality enhancement.

Change management is another critical component that ensures modifications to materials, equipment, processes, analytical methods, or facilities are evaluated systematically before implementation. A structured change control process minimizes unintended consequences and helps maintain the validated state of manufacturing operations. Similarly, deviation management facilitates the investigation of departures from approved procedures and supports the implementation of corrective actions that strengthen process reliability and regulatory compliance⁹. Training and personnel competency are essential for maintaining an effective PQS. Continuous education programs ensure that employees remain knowledgeable about GMP requirements, quality procedures, and evolving regulatory expectations⁶.

In addition, supplier qualification and contractor management are increasingly recognized as important aspects of quality assurance because the quality of raw materials and outsourced services directly influences final product quality⁶. Equipment qualification, calibration, and preventive maintenance contribute significantly to maintaining process consistency and operational reliability^{10,11}. Likewise, robust documentation and knowledge management systems support traceability, regulatory compliance, and informed decision-making throughout the product lifecycle¹⁵. Effective management of organizational knowledge facilitates continuous improvement and enhances process understanding. Modern PQS frameworks increasingly incorporate the principles of Quality by Design (QbD), which promote a science- and risk-based approach to pharmaceutical development and manufacturing. QbD focuses on understanding the relationship between process parameters and product quality, enabling the establishment



of a design space within which consistent product quality can be achieved. CAPA complements QbD by identifying process variations and supporting ongoing optimization efforts¹³.

Quality Assurance and Quality Control

Quality Assurance (QA) and Quality Control (QC) constitute two fundamental components of pharmaceutical quality management systems. Although both functions share the common objective of ensuring product quality, safety, and regulatory compliance, they differ significantly in their scope, methodology, and operational focus. QA is primarily a preventive and system-oriented activity aimed at establishing confidence that pharmaceutical products will consistently meet predefined quality requirements, whereas QC is a product-oriented function focused on testing and verifying that products comply with established specifications^{16,17}. Quality Assurance encompasses all planned and systematic activities implemented within a quality system to ensure that products are designed, developed, manufactured, and distributed according to regulatory requirements and predefined quality standards. QA activities include the development and implementation of Standard Operating Procedures (SOPs), process validation, equipment qualification, personnel training, documentation control, supplier qualification, change control, deviation management, risk assessment, and internal auditing¹⁶. Through these activities, QA seeks to prevent errors, contamination, mix-ups, and quality defects before they occur, thereby promoting a proactive approach to quality management. The increasing emphasis on Quality by Design (QbD) and risk-based quality management has further strengthened the strategic role of QA in modern pharmaceutical manufacturing^{16,19}.

In contrast, Quality Control focuses on the analytical evaluation of materials and products to confirm compliance with predefined specifications. QC laboratories are responsible for testing raw materials, packaging materials, in-process samples, intermediates, finished products, and stability samples using validated analytical methods¹⁷. Common QC activities include chemical analysis, microbiological testing, dissolution studies, environmental monitoring, sterility testing, and stability assessment. The results generated by QC serve as critical evidence for batch release decisions and provide assurance that pharmaceutical products meet the required standards of identity, strength, purity, quality, and safety¹⁷. Despite their distinct responsibilities, QA and QC are highly interconnected and function as complementary elements within the pharmaceutical quality system. Effective quality management requires continuous communication and collaboration between these departments to ensure that quality issues are identified, investigated, and resolved systematically. Information generated through QC testing often serves as a valuable source of quality data for QA-driven investigations and improvement initiatives²¹.

Corrective and Preventive Action (CAPA) plays a pivotal role in integrating QA and QC activities within a unified quality

management framework. CAPA provides a structured approach for identifying quality issues, determining root causes, implementing corrective measures, and preventing recurrence²⁰. For example, when an Out-of-Specification (OOS) result is observed during QC testing, simply repeating the analysis or rejecting the affected batch may not adequately address the underlying problem. Regulatory guidance emphasizes the importance of conducting comprehensive investigations to determine whether the deviation originated from analytical errors, equipment malfunction, sampling deficiencies, manufacturing process variability, operator error, or other systemic factors¹⁸. Through CAPA investigations, organizations can move beyond symptom correction and focus on identifying the true root cause of quality failures.

Root cause analysis tools such as fishbone diagrams, the 5-Why methodology, Failure Mode and Effects Analysis (FMEA), and risk assessment techniques are commonly employed to facilitate systematic investigations^{19,20}. The outcomes of these investigations enable both QA and QC departments to implement targeted corrective actions and develop preventive strategies that reduce the likelihood of recurrence. Furthermore, CAPA supports the transformation of isolated quality incidents into opportunities for organizational learning and continuous improvement. QA departments utilize data generated from QC testing, deviations, complaints, audits, and trend analyses to identify recurring issues and implement system-wide improvements²⁰. Trend analysis allows organizations to detect subtle changes in process performance or product quality before they escalate into significant compliance concerns. Similarly, effectiveness checks conducted as part of CAPA verification help ensure that implemented actions achieve the desired outcomes and remain sustainable over time²⁰. The integration of QA, QC, and CAPA is increasingly recognized as essential for maintaining a robust pharmaceutical quality system. Regulatory agencies encourage pharmaceutical manufacturers to adopt science- and risk-based approaches that facilitate continuous monitoring, knowledge management, and process improvement^{19,21}. By linking analytical findings from QC with preventive quality strategies developed by QA, CAPA enhances operational efficiency, strengthens regulatory compliance, and supports the achievement of a state of control within pharmaceutical manufacturing environments^{20,21}.

Regulatory background of CAPA

Corrective and Preventive Action (CAPA) has emerged as one of the most important regulatory requirements within pharmaceutical quality systems because of its direct impact on product quality, patient safety, regulatory compliance, and continuous improvement. Modern pharmaceutical regulations recognize that quality problems should not only be corrected when they occur but should also be systematically investigated to identify root causes and prevent recurrence. Consequently, CAPA has evolved from a simple problem-solving tool into a comprehensive quality



management process that is integrated with deviation management, change control, risk management, complaint handling, audit observations, and continuous improvement programs²².

The regulatory foundation of CAPA originated from the increasing recognition that recurring quality failures often result from weaknesses in organizational systems rather than isolated operational errors. Regulatory authorities observed that many pharmaceutical quality issues, including product recalls, contamination incidents, out-of-specification (OOS) results, and manufacturing deviations, repeatedly occurred because organizations focused on correcting immediate problems without addressing their underlying causes. As a result, global regulatory agencies began emphasizing systematic investigations, root cause analysis, and preventive action planning as essential elements of quality management systems²².

In the United States, the Food and Drug Administration (FDA) has established CAPA-related requirements through various regulatory frameworks. Under 21 CFR Part 211, which governs Current Good Manufacturing Practices (cGMP) for finished pharmaceuticals, manufacturers are required to investigate discrepancies, failures, complaints, and deviations that may affect product quality²³. These regulations emphasize the importance of documenting investigations, determining root causes, implementing corrective actions, and maintaining records demonstrating that quality issues have been effectively resolved. Furthermore, CAPA principles are extensively described in 21 CFR Part 820, which governs Quality System Regulations for medical devices and provides one of the most detailed regulatory frameworks for CAPA implementation²³.

FDA inspections routinely assess the effectiveness of CAPA systems as an indicator of overall quality system maturity. Regulatory investigators frequently review CAPA records, deviation reports, complaint investigations, audit findings, and effectiveness checks to determine whether organizations are capable of identifying and resolving quality issues systematically²⁴. CAPA-related deficiencies are among the most common observations cited in FDA Form 483 inspection reports and warning letters. Common deficiencies include inadequate root cause investigations, incomplete documentation, insufficient corrective actions, delayed closure of CAPA records, ineffective trend analysis, and failure to verify the effectiveness of implemented actions²⁴. Such deficiencies often indicate broader weaknesses within the quality management system and may result in increased regulatory scrutiny, import alerts, product recalls, or enforcement actions. At the international level, the International Council for Harmonisation (ICH) has played a significant role in standardizing CAPA expectations across regulatory jurisdictions.

The ICH Q10 Pharmaceutical Quality System guideline identifies CAPA as one of the four major PQS elements, alongside process performance and product quality monitoring, change management, and management review.

²⁵ According to ICH Q10, CAPA should be driven by data

obtained from deviations, complaints, audits, inspections, process monitoring activities, and laboratory investigations. The guideline emphasizes scientific evaluation, knowledge management, and continuous improvement as key objectives of an effective CAPA system²⁵. The integration of Quality Risk Management principles into CAPA activities is further reinforced by ICH Q9(R1). This guideline promotes a risk-based approach to identifying, prioritizing, investigating, and resolving quality issues²⁶. Rather than allocating equal resources to every deviation, risk management enables organizations to focus attention on issues that pose the greatest threat to product quality, process performance, regulatory compliance, and patient safety.

Risk assessment tools such as Failure Mode and Effects Analysis (FMEA), Hazard Analysis and Critical Control Points (HACCP), risk ranking, and fault tree analysis are frequently used to support CAPA investigations and decision-making processes²⁶. The World Health Organization (WHO) also recognizes CAPA as an essential component of pharmaceutical quality systems and incorporates CAPA principles within its Good Manufacturing Practice (GMP) guidelines²⁷. WHO guidance emphasizes systematic investigation of quality failures, root cause determination, documentation practices, effectiveness verification, and continuous improvement. The organization particularly highlights the importance of CAPA implementation in developing countries, where strengthening pharmaceutical quality systems is critical for ensuring the availability of safe and effective medicines²⁷. Within the European Union, CAPA requirements are incorporated into EudraLex Volume 4, which provides GMP guidance for medicinal products. European regulators require pharmaceutical manufacturers to establish integrated CAPA systems that are closely linked with deviation management, change control, self-inspections, complaint handling, and quality risk management programs²⁸.

The European approach strongly emphasizes lifecycle management, knowledge management, continual improvement, and maintenance of a state of control throughout product manufacturing operations. Consequently, CAPA is viewed not only as a corrective mechanism but also as a strategic tool for enhancing process robustness and organizational learning²⁸. In India, CAPA expectations are defined through Schedule M of the Drugs and Cosmetics Rules, which outlines Good Manufacturing Practice requirements for pharmaceutical manufacturing facilities²⁹. Recent revisions to Schedule M have significantly strengthened quality system requirements and aligned Indian GMP regulations more closely with international standards such as WHO GMP, ICH Q10, and global regulatory expectations. Particular emphasis has been placed on risk-based quality management systems, deviation investigations, data integrity, documentation practices, root cause analysis, and CAPA effectiveness verification²⁹. These changes reflect India's growing role in the global pharmaceutical supply chain and the increasing expectation that Indian



manufacturers maintain internationally compliant quality systems.

Concept of Corrective and Preventive Action

Corrective and Preventive Action (CAPA) is a systematic quality management methodology used to identify, investigate, eliminate, and prevent quality-related problems within pharmaceutical organizations. CAPA is considered one of the most important components of a Pharmaceutical Quality System (PQS) because it facilitates continuous improvement, regulatory compliance, risk reduction, and operational excellence. The primary objective of CAPA is not only to address existing non-conformances but also to prevent their recurrence and minimize the occurrence of future quality issues. By integrating scientific investigation, risk assessment, process optimization, and continual improvement, CAPA contributes significantly to maintaining product quality and patient safety throughout the pharmaceutical product lifecycle³⁰.

The concept of CAPA is based on the understanding that quality failures are often symptoms of deeper systemic weaknesses rather than isolated events. Pharmaceutical manufacturing environments involve complex interactions among personnel, equipment, materials, processes, analytical methods, and environmental conditions. Consequently, when deviations or quality failures occur, organizations must investigate the underlying causes rather than simply correcting the immediate problem. CAPA provides a structured framework for identifying these causes and implementing sustainable solutions that strengthen the overall quality system³¹. CAPA consists of two interrelated components: Corrective Action and Preventive Action. Corrective Action refers to the activities undertaken to eliminate the root cause of an identified deviation, non-conformance, defect, or quality failure that has already occurred.³¹ Such quality events may include manufacturing errors, out-of-specification (OOS) results, out-of-trend (OOT) findings, environmental monitoring excursions, customer complaints, audit observations, equipment malfunctions, contamination incidents, packaging defects, labeling errors, and process failures. The primary goal of corrective action is not merely to rectify the observed problem but to identify and eliminate the factors responsible for its occurrence, thereby preventing recurrence of the same issue³¹.

A critical aspect of corrective action is root cause analysis, which focuses on determining why a problem occurred rather than addressing only its symptoms. Modern CAPA systems emphasize scientific investigation methods to ensure that corrective actions are evidence-based and effective. Various analytical tools are commonly used during investigations, including Fishbone (Ishikawa) Diagrams, the 5-Why Technique, Failure Mode and Effects Analysis (FMEA), Pareto Analysis, Fault Tree Analysis, and risk assessment methodologies³². These tools assist organizations in identifying contributing factors and establishing corrective measures that target the actual source of quality failures. Effective root cause analysis

significantly reduces the likelihood of recurring deviations and enhances process reliability³². Preventive Action, on the other hand, focuses on identifying and mitigating potential risks before deviations or failures occur³³. Unlike corrective action, which is reactive in nature, preventive action adopts a proactive approach toward quality management. Preventive actions are typically initiated based on trend analysis, process monitoring, quality metrics, risk assessments, audit findings, historical quality data, customer feedback, and performance indicators. By identifying patterns and emerging vulnerabilities, organizations can implement improvements that strengthen process controls and reduce the probability of future quality failures³³.

The preventive element of CAPA has gained increasing importance with the adoption of Quality Risk Management (QRM) and Quality by Design (QbD) principles within the pharmaceutical industry. Regulatory agencies now encourage manufacturers to establish predictive quality systems that identify risks before they affect product quality or patient safety^{26,33}. Continuous monitoring of critical process parameters, environmental conditions, equipment performance, and quality indicators enables organizations to detect early warning signals and implement preventive measures proactively. Such an approach enhances process robustness, improves operational efficiency, and supports regulatory compliance³³.

A typical CAPA process follows a structured sequence of activities, including problem identification, investigation, root cause analysis, risk assessment, development of corrective and preventive actions, implementation of action plans, effectiveness verification, documentation, and management review^{30,31}. Each stage of the CAPA process must be properly documented to ensure traceability, accountability, and compliance with regulatory requirements. Effectiveness verification is particularly important because it demonstrates whether the implemented actions have successfully eliminated the identified root cause and prevented recurrence of the issue³⁰. Modern CAPA systems are closely integrated with other quality system elements such as deviation management, change control, complaint handling, supplier quality management, process monitoring, and management review^{25,31}. This integration facilitates efficient use of quality-related information and promotes a holistic approach to quality improvement. CAPA also serves as an important knowledge management tool by transforming quality incidents into valuable learning opportunities that support continual improvement and informed decision-making²⁵.

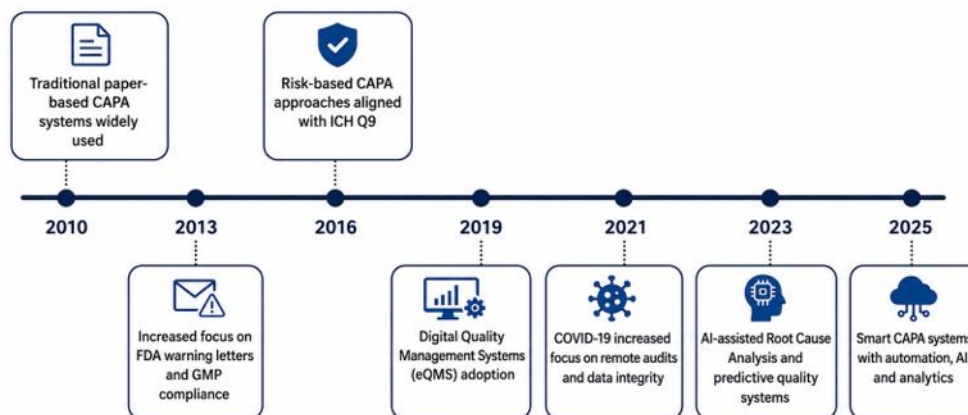
The success of CAPA implementation depends heavily on organizational quality culture and management commitment³⁴. Organizations that treat CAPA merely as a documentation requirement often experience recurring deviations, repeated audit findings, and ongoing regulatory concerns. In such cases, investigations may be superficial, root causes may remain unidentified, and implemented



actions may fail to address systemic deficiencies³⁴. Conversely, organizations with mature quality cultures use CAPA as a strategic improvement tool. These organizations encourage scientific investigation, employee involvement,

cross-functional collaboration, and data-driven decision-making to improve quality performance and operational effectiveness³⁴.

Evolution of CAPA Systems in Pharmaceutical Industry (2010–2025)



Graphical representation created from pharmaceutical industry trend analysis and CAPA evolution literature (2010–2025).

Sources of CAPA in Pharmaceutical Industry

Correction and Prevention Actions (CAPA) systems are launched as a result of diverse quality events, deviations, observations, and risk signals generated at various stages of pharmaceutical product lifecycles. Inasmuch as pharmaceutical products involve numerous processes ranging from procurement of materials to manufacture, packing, quality testing, distribution, and post-marketing activities, CAPA becomes the focal point for integrating quality-related information across all operations in the form of an integrated quality management process. CAPA effectiveness will be contingent on the capability of organizations to recognize, report, investigate, and analyze quality signals generated by different sources in the pharmaceutical industry³⁵. One of the most frequent causes of CAPAs being raised is manufacturing deviations management. Manufacturing deviations refer to deviations that happen whenever there is deviation from processes that have been established according to approved procedure, process parameter validation, environmental control, and specifications. These deviations can be caused by equipment failure, operator mistake, lack of training, material variation, environmental deviation, utilities deviation, procedural deviations, or others.

Examples of such deviations include inappropriate mixing time, environmental deviations during granulation, contamination cases, line clearance problems, packaging mistakes, and more. While sometimes these deviations can seem insignificant at first, they can actually represent deep rooted weaknesses with the entire manufacturing system. Thus, manufacturing deviation management calls for investigations to find out the cause, which can range from human error to insufficient risk management³⁶. Out-of-

Specification results are yet another key reason that triggers the implementation of CAPAs in pharmaceutical quality management systems. OOS results arise when tests on raw materials, intermediates, in-process samples, or finished products are not compliant with the specified acceptance criteria. Such results can be caused by various factors ranging from analytical error to malfunctioning instruments or unstable reagents; they can also result from sampling variability, contamination in the laboratory, or manufacturing problems.

The US Food & Drug Administration requires all OOS results to undergo thorough investigation of their causes³⁷. CAPA makes sure that laboratory problems do not become issues that are seen in isolation as analytical problems alone but are looked at deeply to find out systemic reasons for poor analytical or manufacturing quality control. Likewise, Out-of-Trend (OOT) results become another critical CAPA trigger. While OOS results can lead to out-of-specification results, OOT results are not necessarily out of spec but show unexpected variability or trends within processes that can be found from comparing data with previous ones. OOT results become especially significant in stability studies, environmental monitoring, dissolution studies, and process capabilities. It could become an early indicator that something might go wrong in the process, equipment, raw materials, or the environment itself.

OOTs become predictive of quality problems through CAPA³⁸. Both the customer complaints and market complaints are equally important for CAPA since they highlight the actual functioning of the drugs in practical applications post-commercialization. Complaints based on factors such as breakages in tablets, discoloration, leaking, wrong labeling, decreased effectiveness, contamination

with particles, problems in packaging, and adverse effects help in gaining insight into areas that may be weak in manufacturing and delivery processes. Investigations of customer complaints enable the discovery of quality-related problems that might go unnoticed in internal quality assurance checks.³⁹ The CAPA system ensures that any customer complaint is thoroughly evaluated, trends established and linked with broader quality investigations where needed. Internal audit, external audit, and regulatory inspection also form essential sources for initiating CAPA. Self-inspection is carried out by companies to evaluate compliance with GMP guidelines, SOP adherence, documentation practices, validation, and quality management measures.

Inspection is conducted by regulatory authorities like FDA, EMA, WHO, MHRA, and CDSCO among others. CAPA observations tend to reflect system-wide weaknesses related to documentation, data integrity, handling of deviations, environmental monitoring, training, or process controls⁴⁰. The need for implementing an effective CAPA program is thus critical in order to fill such compliance gaps and avoid reoccurrence of observations related to regulations⁴¹. Another important area where CAPAs can be raised in a pharmaceutical environment involves equipment and maintenance issues. Equipment used in pharmaceutical manufacturing includes reactors, granulators, fluid-bed dryers, tableting presses, filling machines, sterilizers, HVAC units, purified water systems, and analytical instrumentation⁴². Deficiencies in the proper functioning of equipment or their maintenance have a direct impact on production, sterility, and product quality. Pharmacovigilance systems and ADRs also play a role in the creation of CAPAs, especially for post-market quality surveillance of products. Reports of adverse events submitted by physicians, patients, hospitals, or from regulatory databases could identify defects in product quality that have not been recognized in the testing of a product in clinical trials or manufacturing. Unexpected cases of therapeutic failures, contamination-based toxicities, or unstable formulations could all indicate the need for CAPAs that would link issues detected by pharmacovigilance back to manufacturing, raw material issues, packaging systems, or storage conditions⁴³.

In addition, failures in environmental monitoring programs, microbial contamination incidents, validation issues, change control observations, supplier complaints, utility excursions, stability failures, and process trend analysis also play a vital part in the creation of CAPAs. All of these examples illustrate the fact that CAPAs do not deal only with manufacturing problems, but are actually an overall quality intelligence system that covers the entire life cycle of pharmaceutical product quality⁴⁴.

CAPA Process Flow

The CAPA Process is an extremely well-defined and methodical approach designed to ensure scientific inquiry, compliance, auditability, accountability, and ongoing improvement of quality standards. Regulatory agencies

around the world demand that companies involved in pharma must have documented procedures for carrying out the CAPA process, which entails defining each step of the process right from the identification of the problem to the final verification of the solution implemented.

A good CAPA process essentially acts like a feedback loop for quality management, wherein operational learnings continuously contribute to the quality management of pharma companies⁴⁵. The CAPA cycle begins with the identification and detection of the deviation/problem. This step involves the documentation of any kind of quality-related event like manufacturing deviations, laboratory deviations, customer complaints, environmental monitoring deviations, audit findings, or equipment failures. Documentation in the first phase is important since any lack of information during the documentation process can affect future investigation procedures. Normally, the occurrence reported is assigned a unique identification number, classified based on its level of significance, and initially assessed to see how it could affect product quality and patient safety³⁸. After a deviation is detected, immediate steps to contain the deviation are undertaken to avoid exacerbation of the problem. Containment involves actions such as batch segregation, production halt, equipment isolation, material quarantine, stopping product distribution, among others⁴⁶. Containment is important to mitigate risks associated with product quality during investigations⁴⁷.

The subsequent and crucial step in the CAPA process is the root cause investigation. At this point, a multidisciplinary team investigates evidence collected to uncover the real cause of the deviation and not just deal with the surface symptoms. The investigators examine the information contained in batch manufacturing documents, laboratory documents, calibration logs, environment monitoring data, equipment maintenance documents, employee training programs, and process trends to uncover the root cause of the deviation.

Tools for root cause investigation such as Fishbone diagrams, 5 Whys, Fault tree analysis, and Failure Mode & Effect Analysis are often used⁴⁸. After determining the underlying problem, the organization conducts risk assessment to determine the seriousness, probability, and detectability of the identified problem. It allows the organization to prioritize the CAPA based on how the action would affect product quality, patient safety, data integrity, and regulatory compliance. In cases where the problem identified carries high risks, then the required actions should be immediately taken; however, in cases of lower risks, then preventive action is sufficient⁴⁹.

Once the risk assessment phase is completed, the CAPA action plan is formulated. Such a plan entails the required corrective measures that would address the determined root cause and the preventive measures intended to prevent recurrence in the future. CAPA action plans consist of process changes, equipment changes, employee retraining activities, process revalidation, qualification of



suppliers, improved monitoring measures, or introduction of technology⁵⁰. In addition, the CAPA action plan sets out the timeframes for the implementation of these measures, people who will implement these measures, resources needed to implement these measures, criteria for reviewing these measures, and the individuals whose responsibility it is to approve these measures. The implementation of the corrective and preventive actions is the implementation phase in the CAPA process⁵¹.

Verification of effectiveness is one of the key regulatory requirements in the process of CAPA implementation. Regulatory agencies tend to point at lack of evidence that the measures taken actually helped resolve the problem in question. Effective verifications can be conducted through trend analysis, repeated testing, monitoring of the processes, internal auditing, review of environmental monitoring results, complaints analysis, or follow-ups. Closure of CAPA is not allowed until objective evidence is obtained which proves that the measures taken have effectively addressed the problem and ensured its resolution⁵². Lastly, closure of the CAPA case must involve review and approval from the quality assurance department and management. Proper documentation of the entire process, including investigation findings, risk assessment, corrective and preventive actions, implementation records, and effectiveness verification results is stored and will be used in further regulatory compliance processes⁵³.

Root Cause Analysis Tools in CAPA

The Root Cause Analysis (RCA) methodology constitutes the scientific base for the CAPA methodology since its efficiency lies in identifying the root cause of a particular deviation correctly. In many cases, the lack of proper investigation results in inefficient execution of CAPAs, recurrent deviations, inspections by regulatory authorities, and poor product quality⁵⁴. To avoid such situations, pharmaceutical companies apply systematic approaches to RCA, which include rigorous investigations, substantiated analysis, objectivity, and science-based conclusions. "5 Whys" methodology is one of the most popular approaches applied to pharmaceutical investigations. It consists in asking the question "why" until the actual root cause is found out. In other words, "5 Whys" helps to uncover the real cause lying behind the observed problem. For instance, while investigating the tablet dissolution problem, the company may go through different levels of questioning concerning granulation process, machine calibration, operator competence, moisture in the air, and/or variation of raw materials⁵⁵.

Another widely used RCA method employed in CAPA processes is the Fishbone diagram, otherwise known as the Ishikawa diagram or cause-and-effect diagram. This analytical process involves the categorization of probable causes of the deviation, including Man, Machine, Method, Material, Measurement, and Environment. Fishbone is especially useful due to the fact that it enables systemic brainstorming and interdepartmental collaboration. The reason why Fishbone should be used is the fact that by

categorizing contributing factors, CAPA personnel can assess all relevant dimensions of a quality problem rather than limiting their analysis to a particular one. The Failure Mode and Effects Analysis (FMEA) is a widely used RCA method aimed at identifying process failures.⁵⁶ FMEA is a comprehensive process which involves not only the identification of process weaknesses, but also assessing their impact and evaluating their severity. In addition, RPN scores are determined for each failure. In CAPA process, FMEA is usually utilized not only for investigating quality deviations but also for preventive activities aimed at quality enhancement. FMEA is especially helpful in validation activities, equipment qualification, sterile manufacturing, and process controls⁵⁷.

Another RCA tool is Pareto Analysis, where, according to the principle 80/20, the vast majority of quality defects is always due to a small number of factors contributing to them. In other words, Pareto analysis helps to statistically review deviations, complaints, and process failures to determine the main causes for their addressing. Such a tool will be useful for rationalization and proper CAPA planning as far as it allows for focusing on the most crucial quality defects⁵⁸. As well, brainstorming approaches are of great importance for effective implementation of CAPAs, especially for the investigation of multidisciplinary root causes. Production department staff, engineers, representatives from quality assurance and control departments, validation team members, warehouse managers, maintenance department workers work together in order to analyze the collected information and develop possible hypotheses about the deviation causes⁵⁹.

Fault Tree Analysis (FTA) is yet another sophisticated RCA method that is currently employed extensively within pharmaceutical operations. The Fault Tree Analysis employs the logical diagram approach to analyze the linkages between system failures and other events responsible for them. Fault Tree Analysis can be effectively utilized in situations of contamination, automated systems failure, and utility systems problems⁶⁰. The modern pharmaceutical industry is also incorporating technology such as digital technology, statistical modeling, artificial intelligence, and data analytics in conducting RCAs. The use of electronic Quality Management Systems (eQMS), predictive analysis software, and machine learning algorithms can assist in identifying the hidden relationships between processes, repetitive trends, and statistical anomalies that might not easily come out in manual investigation. This technology greatly enhances the effectiveness and efficiency of the RCAs⁶¹.

The main purpose of using RCA tools is to conduct CAPA investigations by using scientifically proven processes instead of relying on opinions or guesses⁶². RCA greatly enhances process knowledge, reduces the repetition of deviations, increases compliance with regulatory requirements, enhances operational efficiencies, and adds value to the Pharmaceutical Quality System.



Role of CAPA in Pharmaceutical Quality Systems

Indeed, Corrective and Preventive Actions (CAPA) are crucial for improving PQS because it enables the ongoing observation, assessment, adjustment, and enhancement of pharmaceutical production and quality processes. Contemporary pharmaceutical companies view CAPA not as a mere tool for responding to deviations but as a system of quality improvement that facilitates compliance with regulations and excellence in operations, ensuring consistent drug manufacturing and safe products for patients.

The Pharmaceutical Quality System mentioned in ICH Q10 points out that "CAPA" is one of the four key elements needed to establish and maintain a state of control in the manufacture of pharmaceutical products, from development to commercialization⁶³. Another important role of CAPA in PQS is the provision of a feedback mechanism where quality problems are turned into improvement opportunities. Production in the pharmaceutical industry is quite complex; there are numerous interconnected production systems involved that include raw material management, machine operation, environmental control, process validation, analysis, packaging, and distribution. A problem in any of these production systems can result in deviation, non-conformity, contamination, or poor-quality products. With CAPA, any deviations will not be considered one-off events; rather, thorough investigation will be done to unearth the causes behind these deviations. With a proper root cause analysis of these problems, it becomes possible to take scientifically validated actions towards improving the overall manufacturing system⁵⁶. The system also has a crucial part to play in ensuring process consistency and product quality during the entire life cycle of production.

The products should have certain qualities associated with their identity, strength, purity, efficacy, and safety. Any changes in the process parameters, machinery, environment, or operators' actions can affect the quality attributes of the product produced. This is because any variance can affect the consistency and reliability of the manufacturing process, leading to non-conformity. The process variances are continuously detected using deviation reports, trend analysis, audit findings, environmental monitoring results, and customer complaints⁶⁴.

The other key contribution of CAPA to PQS is the integration of QRM concepts described in ICH Q9. Current approaches to pharmaceutical quality systems rely on risk-based thinking rather than compliance-based thinking only. The CAPA systems, consequently, focus their attention and activities on investigating and taking actions based on the seriousness, frequency, and detection possibilities of various quality risks. Deviations that are serious enough to pose danger to patients and compromise efficacy of products get immediate attention and thorough investigation. Other types of deviations can be addressed by simpler correction efforts⁶⁵. CAPA also improves regulatory compliance and preparedness for inspections. The US FDA,

EMA, WHO, and other international regulatory bodies view CAPA as an essential factor for determining the maturity and effectiveness of the quality system of a company. The investigation into the CAPA process forms a significant part of the inspection, as the inspector evaluates how the company responds to any deviation, investigates root cause analysis, takes remedial action, and monitors the success of these activities. Poor and inefficient CAPA programs are one of the most common reasons for receiving FDA warning letters and import alert notices.

Hence, the effective implementation of the CAPA program shows that the company is committed to quality assurance and continuous improvement⁶⁶. CAPA is equally important in enhancing organizational learning and knowledge management processes. All instances of deviations, complaints, observations from an audit, and any other process-related problems are sources of information about the inadequacies in the manufacturing system. CAPA processes collect, analyze, and document all such information and convert it into useful corporate knowledge. This knowledge, over time, leads to the improvement of standard operating procedures (SOPs), training procedures, validation approaches, equipment qualification processes, and process controls⁶⁷.

In addition, CAPA plays a vital role in improving operational efficiency and reducing manufacturing costs. Repeated deviations, batch failures, rework activities, product recalls, and regulatory non-compliance can result in substantial financial losses for pharmaceutical companies. By identifying the root causes of quality failures and implementing long-term preventive measures, CAPA reduces recurrence of problems and minimizes waste generation. Effective CAPA implementation therefore improves manufacturing productivity, optimizes resource utilization, and enhances overall operational performance⁶⁸. Equally important is the role of CAPA in contributing to patient safety and safeguarding public health. Any product developed in pharmaceutical industries has direct effects on patient care, hence the need for proper quality measures since the smallest quality problems may cause health-related challenges. CAPA systems are used to investigate and correct deviations in the quality attributes of products so that when the final product is made available to consumers, there will be no adverse impact on their health status⁶⁹.

Besides, the incorporation of information on pharmacovigilance and post-marketing data into the quality system enables organizations to act before any problem occurs, which ensures improved patient safety and builds consumer trust. Recent developments in the use of e-QMS and e-CAPA platforms have also contributed to an increased role of CAPA systems in pharmaceutical industries. E-CAPA improves several aspects of CAPA systems including deviation management, document control, trend analysis, workflow management, and effectiveness verification. The integration of artificial intelligence and predictive models has resulted in CAPA becoming predictive quality



intelligence software by predicting problems before they happen.⁷⁰

Documentation and Data Integrity

Documentation is among the most crucial aspects when implementing CAPAs since all the processes in the CAPA cycle require proper documentation, which should be traceable, scientifically validated, and easily retrievable during regulatory inspections. It is widely recognized that regulatory authorities have great expectations when it comes to good documentation practices as the saying goes that "If it was not documented, it did not happen." The need for good documentation practices is even more pressing in pharmaceutical manufacturing companies, where data integrity and adherence to Good Manufacturing Practices (GMPs) are mandatory. Good documentation starts with reporting of quality deviations. Deviations are quality events reported in written form with all the pertinent information about the event itself. Deviations contain information on the event, date and time, products and equipment involved in the event, an estimate of its impact, and containment measures applied. This kind of documentation is very important as incomplete and poorly conducted deviation reporting can jeopardize further investigation and implementation of corrective and preventative measures. Once all the deviations are reported, thorough investigation is carried out and detailed investigation reports are generated⁷¹. The accuracy and thoroughness of the CAPA documentation impact the regulators' trust on the quality system of the organization. It is not uncommon for regulatory inspectors to analyze the CAPA documentations in order to assess if the investigations are scientifically sound, if the implemented corrective actions are capable of resolving the root causes, and if preventive measures have been put into place in order to minimize risks⁷². Insufficient documentation, incomplete record keeping, inaccurate data entry, or lack of explanation for deviations can suggest that there is a lack of quality culture within the company which could lead to major regulatory findings or even warning letters. An efficient documentation process will include a number of essential documents such as deviation reports, investigation reports, root cause analyses, risk assessments, corrective action plans, preventive action plans, implementation reports, effectiveness reports, management review reports, and closure approvals among others⁷³. In recent years, pharmaceutical companies have shifted from paper-based CAPA processes to electronic CAPA (eCAPA), which is integrated into an Electronic Quality Management System (eQMS). An electronic system provides many benefits such as workflow automation, real-time tracking, centralized document storage, electronic signature capability, automatic audit log creation, and increased accessibility. The implementation of an eCAPA reduces the chance of making any errors while documenting manually, losing records, failing to conduct thorough investigation and approval process. Moreover, with electronic systems, it becomes easier to conduct trends as the organization can detect repeating deviations, root cause commonality, and weaknesses in the processes. Data

integrity is the base of proper CAPA documentation and has emerged as one of the critical areas regulated by agencies. Data integrity ensures the completeness, consistency, accuracy, and reliability of data over its entire life cycle. It is required by agencies such as US FDA and EMA that the pharmaceutical company adheres to ALCOA+ standards, according to which the data generated from pharmaceutical systems is Attributable, Legible, Contemporaneous, Original, Accurate, Complete, Consistent, Enduring, and Available. The "Attributable" principle states that the record of the CAPA activity should attribute the person who is accountable for creating the record or who reviewed or approved the information. "Legible" means that the record remains legible during its entire retention period. The "Contemporaneous" principle refers to the need to document data when the corresponding activities take place and not after they happen. "Original" means that the organization should keep original records and certified copies, whereas the principle of "Accurate" ensures that the data reflects the actual observations made and activities performed. There are other ALCOA+ criteria, including completeness and consistency, which increase the reliability of pharmaceutical data management systems⁷⁴. Violations of data integrity may result in serious consequences for pharmaceutical companies. The manipulation of data, late date recording, loss of records, unauthorized changes to documents, and incomplete investigations may compromise the quality of products and lead to harm for patients. Increasingly often, regulatory agencies send out warning letters and issue import alerts on data integrity problems due to the inability to ensure the validity of data and decisions made by relying on the data⁷⁵. Training and organizational culture are also very essential to ensure that documentation quality is maintained. The staff responsible for deviation handling and implementation of CAPA measures should be knowledgeable on why proper documentation is crucial, together with regulatory expectations. Training in good manufacturing practices (GMPs), data integrity education programs, and internal auditing efforts can promote the culture of compliance and reduce the likelihood of issues related to documentation. Management's support is equally important, as the leadership's commitment to openness, accountability, and the company's quality culture is going to influence the staff's attitudes toward documentation. One of the other modern dimensions of CAPA documentation is the incorporation of advanced digital technologies like AI and machine learning (ML), cloud computing services, blockchain, and predictive analytics. Therefore, documentation and data integrity form essential elements of successful CAPA management within pharmaceutical quality management systems. Documentation provides the necessary traceability, accountability, and scientific rationale behind the actions taken. Meanwhile, data integrity guarantees the authenticity and validity of information about quality processes. All these enhance quality culture within the organization and lead to the production of safe and effective medicines.



Challenges in CAPA Implementation

Even though the CAPA system is highly important for pharmaceutical quality management, numerous organizations continue encountering problems with their CAPA programs. Poorly developed CAPA systems may negatively affect product quality, hinder regulatory compliance, lead to increased expenses, and finally pose a threat to the health of patients. The global experience shows that deficiencies in CAPA systems are regularly found by regulators during inspection processes⁷⁶. One of the most typical and crucial problems is erroneous root cause determination. The successful implementation of CAPA greatly relies on being able to identify the root cause of deviations or non-conformities. Yet many companies tend to pay attention to the surface-level symptoms without finding out the real reason behind the problem. Human error, for instance, is often named the root cause without further exploration into why the error took place - was it due to the lack of proper training, bad procedures, too much work, insufficient supervision, etc⁷⁷. One of the other challenges associated with implementing CAPA is the delay in CAPA closures and poor timeline management. The process of CAPA investigations is quite complex and requires considerable data gathering, cross-functional collaboration, technical analysis, and managerial approval. Lack of proper resource allocation, incorrect prioritization, or high complexity of administration processes might result in the delays in finishing CAPA actions. Regulatory bodies consider late CAPA reports as evidence of poor quality control in the organization and lack of managerial support⁷⁸. Another challenge in relation to CAPA activities is connected to the potential negative effect of the prolonged delay in completing CAPA actions on the quality of manufacturing and products. Poor training of employees and lack of technical expertise constitute other obstacles during the process of implementing CAPA. Effective CAPA investigations require staff to be knowledgeable about the GMP, root cause analysis methods, risk assessment principles, and proper documentation procedures. However, employees in some pharmaceutical companies do not undergo sufficient training in investigation methods like Fishbone analysis, the 5 Whys method, or FMEA. Failure to train employees and lack of technical know-how is another impediment to successful implementation of CAPA. For successful CAPA investigations, it is necessary for employees to have good understanding of GMP, root cause analysis, risk assessment and documentation processes. In most pharmaceutical organizations, employees are usually inadequately trained in how to conduct structured investigations using techniques like fishbone analysis, 5 whys method and failure mode and effects analysis (FMEA). This will eventually make the investigations flawed scientifically, inconsistent and lacking important information⁷⁹. Poor documentation practices is another recurring problem in CAPA. The problem with poor documentation practices includes incomplete deviation report, inadequate investigation documentations, lack of scientific justification of action taken and data

inconsistencies among others. Since CAPA documents serve as important evidence when there are inspections, poor documentations pose serious risks of generating warning letter and other regulatory violations including import controls. Pharmaceutical organizations that still rely on disjointed paper-based documentation system are more prone to documentation problems. The lack of collaboration between different departments also compromises CAPA efforts. The production process of a pharmaceutical company involves several functions, such as production, quality assurance, quality control, engineering, validation, warehouse, and regulatory affairs functions. Thus, an effective investigation of potential deviations should include the involvement of multidisciplinary teams. Poor interdepartmental communication and responsibility division can hamper the comprehensive investigation process and implementation of CAPA actions. Collaboration among all the departments involved in CAPA is crucial to overcoming any problems related to this process. Moreover, there is a problem associated with insufficiently developed trend analysis capabilities⁸⁰. Many companies focus on investigating each deviation separately and neglect the issue of possible trends. As a result, the organization cannot identify any equipment or procedural problems, which should be addressed through larger systemic changes. With the development of modern technology, trend analysis is becoming increasingly popular⁸¹. Success. In companies where management is focused on meeting production goals rather than quality-related ones, employees are likely to see CAPA implementation as an unnecessary process. As such, without proper support from company leaders, companies cannot properly allocate necessary resources for CAPA processes, provide training, timely investigate any deviations, and hold employees accountable for non-compliance. On the other hand, organizations with a quality culture ensure that employees report deviations, find solutions to problems and pursue initiatives related to continuous improvement. The fast development of technology used by pharmaceutical companies has added another dimension to the complexity of CAPA procedures. In today's pharmaceutical industry, manufacturing processes involve automation and use of computer systems, biotechnological approaches, and continuous manufacturing. Thus, investigating deviations in these processes calls for highly skilled specialists, sophisticated analysis, and special training. Companies which cannot keep up with the development of technology face challenges in managing current risks related to manufacturing. Another challenge associated with CAPA processes is related to increasing demands of regulatory agencies in regards to implementing CAPA systems. Today, regulatory agencies require companies to show scientific rationale, risk-based approach, effectiveness assessment, and data integrity during the entire CAPA cycle. Overall, CAPA implementation challenges arise from technical, organizational, cultural, and regulatory factors. Addressing these challenges requires strong management commitment, continuous employee training, adoption of advanced digital systems, cross-functional collaboration,



and robust quality culture. Overcoming these barriers is essential for building effective CAPA systems capable of supporting sustainable pharmaceutical quality, regulatory compliance, and patient safety⁸².

Best Practices for CAPA System

The implementation of an efficient Corrective and Preventive Actions (CAPA) program is key to sustaining an efficient Pharmaceutical Quality System (PQS). As regards best practices for CAPA implementation, besides the necessity to rectify existing deviations, emphasis is also placed on promoting quality culture and reducing the probability of future defects. According to regulatory bodies like US FDA, EMA, and ICH, an efficient CAPA program should be based on science, risk assessment, documentation, and constant monitoring. Among all best practices that can be recommended for implementing CAPA programs, one of the crucial factors is the creation of quality culture backed by strong management commitment. The concept of quality culture involves the shared attitudes, values, and behaviors associated with the promotion of quality, compliance, transparency, and efficiency within organizations.

Employee training and competency development are essential for an effective CAPA process. Employees from manufacturing, QA/QC, engineering, validation, and regulatory departments need sufficient knowledge of Good Manufacturing Practices (GMP), root cause analysis approaches, risk assessment techniques, and documentation procedures. Training helps employees realize the significance of performing CAPA in scientific and regulatory aspects. Organizations that develop competencies of their employees usually face lesser documentation problems, better root cause determination, and compliance results⁸². One of the most important best practices is implementing CAPA within Quality Risk Management (QRM) concept in accordance with the provisions of ICH Q9 guidance document. By conducting risk-based CAPA, one can be sure that investigations and corrections will be performed according to the level of risk associated with deviations. High-risk deviations, including sterility failure, contamination, or serious analytical mistakes, are supposed to be investigated and corrected without any delay⁸³.

On the contrary, low-risk deviations can be dealt with using a simpler approach. Risk prioritization allows saving resources and focusing efforts on high-impact areas⁸². Another aspect that contributes greatly to effective CAPA system implementation is root cause analysis (RCA). It is essential for organizations to apply scientific tools for conducting root cause investigations, including Ishikawa (fishbone) diagram, 5 whys, failure mode and effects analysis (FMEA), fault tree analysis, and Pareto analysis⁸⁴. RCA investigations must include cross-functional groups from various organizational units to ensure comprehensive analysis of possible root causes. Proper root cause analysis considerably decreases the risk of deviation repetition and increases process stability in general. Trend analysis and

data monitoring are other key best practices for managing CAPA programs effectively. Large amounts of quality data is accumulated by pharmaceutical companies in relation to deviations, environmental monitoring, complaints, audit findings, stability, and laboratory investigations. Data trend analysis and statistics will allow pharmaceutical companies to reveal potential trends, risks, and system failures prior to their occurrence, thus preventing serious compliance issues⁸⁵. Implementation of digital Quality Management Systems (QMS) and eCAPA systems became another best practice in contemporary pharmaceutical sectors. Paper-based CAPA systems are prone to such problems as delays, lack of completeness, traceability, and accessibility. By contrast, use of eCAPA improves workflow automation, document control, audit trail creation, monitoring in real time, and effectiveness measurement⁸⁶.

Moreover, eQMS systems help integrate deviations, change control, training, audit, and CAPA processes and increase the efficiency of the entire QMS. On the other hand, timely CAPA closure and effectiveness measurement is important for maintaining CAPA system efficiency. First of all, realistic and strict deadlines for investigation, implementation, and follow-up stages need to be set up. If CAPA closure is delayed, this means that management lacks necessary oversight and risks the appearance of unresolved quality problems that can affect product quality⁸⁷. The latter needs to be scientifically supported by proving the successful elimination of the problem and its prevention in the future. Otherwise, a company's CAPA system might shift from quality enhancement to simple compliance. Cross-functional collaboration is yet another best practice. CAPA investigations often require input from various departments including production, engineering, quality assurance, microbiology, validation, and regulatory affairs.

Cross-functional collaboration ensures greater precision and minimizes the time taken to implement corrections. Collaboration among cross-functional groups also ensures that any correction plan is well-rounded and takes into account both technical and operational aspects of a quality deficiency⁸⁸. Lastly, management review is an equally important component of any effective CAPA process. Regular review of various aspects including trends in CAPAs, deviation recurrence, overdue CAPAs, outcome of CAPAs, and potential risks should be performed by the management as part of management review sessions. This allows organizations to identify wider problems, evaluate resource needs, and institute necessary improvements in their quality system. Recent technological advancements including artificial intelligence (AI), machine learning (ML), prediction analytics, and cloud-based quality systems have increased the impact of CAPA process on its effectiveness.

These systems can analyze past CAPA history for identifying repeated patterns and predicting future deviations. This way, CAPA processes are being converted from problem-solving frameworks to predictive quality intelligence that could enable continuous manufacturing and quality assurance in real time. Generally speaking, incorporation of



best practices in the CAPA process would help improve the quality management in the pharmaceutical industry by ensuring that there is no repeated deviation, maintaining compliance, improving efficiency, and ensuring patients' safety. Those organizations that are able to develop scientific and risk-based CAPA systems using digital integration and continuous monitoring would be in a better position for achieving quality excellence sustainability.

DISCUSSION

By offering a methodical framework for locating, examining, and resolving quality-related problems, Corrective and Preventive Action (CAPA) is essential to preserving the quality of pharmaceutical products. In order to identify the underlying reasons of deviations, out-of-specification results, complaints, and manufacturing failures and to put effective remedial measures in place, CAPA makes sure that these issues are carefully examined. By reducing the likelihood that comparable problems will recur, preventive measures also improve process uniformity and dependability. CAPA improves overall quality management systems and facilitates adherence to regulatory standards like Good Manufacturing Practices (GMP) in the pharmaceutical industry. Continuous improvement, risk mitigation, operational effectiveness, and patient safety are all enhanced by an efficient CAPA program. Additionally, it ensures that pharmaceutical goods continuously fulfil predetermined quality, safety, and efficacy criteria throughout their lifecycle by encouraging a proactive quality culture inside organisations.

CONCLUSION

Corrective and Preventive Action (CAPA) is considered one of the most essential components of Pharmaceutical Quality Systems and plays a vital role in maintaining product quality, ensuring regulatory compliance, improving operational performance, and safeguarding patient health. In pharmaceutical manufacturing, where production activities directly affect human life and therapeutic outcomes, CAPA provides a systematic and scientific approach for detecting deviations, identifying root causes, implementing corrective measures, and preventing recurrence of quality-related issues. Beyond meeting regulatory requirements, CAPA also acts as a powerful tool for continuous improvement, enhancing the effectiveness and reliability of pharmaceutical quality systems. The incorporation of CAPA into Good Manufacturing Practices (GMP), Quality Risk Management principles under ICH Q9, and Pharmaceutical Quality Systems described in ICH Q10 has greatly improved the ability of pharmaceutical companies to maintain process consistency and ensure quality throughout the product lifecycle. CAPA systems help organizations view deviations not simply as isolated incidents but as opportunities to improve processes, strengthen systems, and support long-term quality enhancement. Through detailed investigations and scientifically justified corrective measures, CAPA contributes to reduced process variability, fewer product recalls, improved operational efficiency, and greater confidence from regulatory authorities. Successful

implementation of CAPA depends on several important factors such as effective root cause analysis, accurate documentation, strong data integrity practices, management involvement, skilled personnel, and cooperation between different functional departments. Organizations that effectively embed CAPA into their quality culture are more likely to achieve long-term compliance and manufacturing excellence. In contrast, poorly managed CAPA systems can lead to repeated deviations, regulatory observations, warning letters, and increased operational risks. The increasing complexity of pharmaceutical manufacturing processes and changing regulatory expectations are driving continuous advancements in CAPA systems. Modern technologies including artificial intelligence, machine learning, predictive analytics, electronic Quality Management Systems (eQMS), continuous manufacturing technologies, and digital twin models are transforming CAPA from a traditionally reactive system into a proactive and predictive quality management tool. These innovations are expected to strengthen process monitoring, improve real-time risk management, and support ongoing quality improvement across the entire pharmaceutical product lifecycle. Most importantly, CAPA has a direct impact on patient safety. By enabling timely detection and correction of quality-related failures, CAPA reduces the possibility of defective pharmaceutical products reaching patients and helps ensure the consistent supply of safe, effective, and high-quality medicines. As pharmaceutical industries continue progressing toward digitalization, automation, and data-driven quality systems, CAPA will remain a central element of pharmaceutical quality governance and an important contributor to regulatory compliance, manufacturing reliability, and protection of public health.

Source of Support: The author(s) received no financial support for the research, authorship, and/or publication of this article

Conflict of Interest: The author(s) declared no potential conflicts of interest with respect to the research, authorship, and/or publication of this article.

REFERENCES

1. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH Harmonised Tripartite Guideline Q10: Pharmaceutical Quality System. Geneva: ICH; 2008
2. U.S. Food and Drug Administration. Guidance for Industry: Quality Systems Approach to Pharmaceutical CGMP Regulations. Rockville (MD): FDA; 2006.
3. World Health Organization. WHO good manufacturing practices for pharmaceutical products: main principles. WHO Technical Report Series No. 986. Geneva: WHO; 2014.
4. European Medicines Agency. ICH guideline Q9 on Quality Risk Management. Amsterdam: EMA; 2020.
5. Jain DK, Saharan VA. Quality risk management and CAPA systems in pharmaceutical industries. Int J Pharm Sci Rev Res. 2018;52(2):45-52



6. International Conference on Harmonisation (ICH). ICH Q10 Pharmaceutical Quality System. Geneva: ICH Secretariat; 2008.
7. International Conference on Harmonisation (ICH). ICH Q8(R2) Pharmaceutical Development. Geneva: ICH Secretariat; 2009.
8. International Council for Harmonisation (ICH). ICH Q9(R1) Quality Risk Management. Geneva: ICH Secretariat; 2023.
9. Sandle T. Pharmaceutical Quality Systems: A Practical Guide. Boca Raton (FL): CRC Press; 2018.
10. Nash RA, Wachter AH. Pharmaceutical Process Validation. 3rd ed. New York: Informa Healthcare; 2003.
11. Rathore AS, Sofer G. Process Validation in Manufacturing of Biopharmaceuticals. 3rd ed. Boca Raton (FL): CRC Press; 2013.
12. De Feo JA, Juran JM. Juran's Quality Handbook: The Complete Guide to Performance Excellence. 7th ed. New York: McGraw-Hill Education; 2017.
13. Yu LX. Pharmaceutical quality by design: product and process development, understanding, and control. Pharm Res. 2008;25(4):781–791.
14. United States Food and Drug Administration. Guidance for Industry: Quality Systems Approach to Pharmaceutical CGMP Regulations. Silver Spring (MD): FDA; 2006.
15. Patel KT, Chotai NP. Documentation and records: harmonized GMP requirements. J Young Pharm. 2011;3(2):138–150.
16. World Health Organization. Quality Assurance of Pharmaceuticals: A Compendium of Guidelines and Related Materials. Vol. 2. Geneva: WHO; 2019.
17. United States Pharmacopeia (USP). General Chapter <1225> Validation of Compendial Procedures. Rockville, MD: USP Convention; 2023.
18. United States Food and Drug Administration. Investigating Out-of-Specification (OOS) Test Results for Pharmaceutical Production. Silver Spring, MD: FDA; 2022.
19. International Council for Harmonisation (ICH). ICH Q9(R1): Quality Risk Management. Geneva: ICH Secretariat; 2023.
20. Sandle T. Corrective and Preventive Action (CAPA) in Pharmaceutical Manufacturing. Boca Raton: CRC Press; 2019.
21. International Council for Harmonisation (ICH). ICH Q10 Pharmaceutical Quality System. Geneva: ICH Secretariat; 2008.
22. Evans JR, Lindsay WM. Managing for Quality and Performance Excellence. 11th ed. Boston: Cengage Learning; 2019.
23. United States Food and Drug Administration. 21 CFR Part 211: Current Good Manufacturing Practice for Finished Pharmaceuticals. Silver Spring (MD): FDA; 2024.
24. United States Food and Drug Administration. Warning Letters and Form FDA 483 Inspectional Observations Related to CAPA Systems. Silver Spring (MD): FDA; 2024.
25. International Council for Harmonisation. ICH Q10 Pharmaceutical Quality System. Geneva: ICH Secretariat; 2008.
26. International Council for Harmonisation. ICH Q9(R1) Quality Risk Management. Geneva: ICH Secretariat; 2023.
27. World Health Organization. WHO Good Manufacturing Practices for Pharmaceutical Products: Main Principles. Geneva: WHO; 2022.
28. European Commission. EudraLex Volume 4: EU Guidelines for Good Manufacturing Practice for Medicinal Products for Human and Veterinary Use. Brussels: European Commission; 2023.
29. Government of India. Drugs and Cosmetics Rules, 1945: Schedule M – Good Manufacturing Practices and Requirements of Premises, Plant and Equipment for Pharmaceutical Products. New Delhi: Ministry of Health and Family Welfare; 2024.
30. Sandle T. Corrective and Preventive Action (CAPA) in Pharmaceutical Manufacturing. Boca Raton (FL): CRC Press; 2019.
31. International Council for Harmonisation. ICH Q10 Pharmaceutical Quality System. Geneva: ICH Secretariat; 2008.
32. Stamatis DH. Root Cause Analysis: From Tools to Techniques. 3rd ed. Milwaukee (WI): ASQ Quality Press; 2019.
33. International Council for Harmonisation. ICH Q9(R1) Quality Risk Management. Geneva: ICH Secretariat; 2023.
34. Evans JR, Lindsay WM. Managing for Quality and Performance Excellence. 11th ed. Boston: Cengage Learning; 2019.
35. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH Harmonised Guideline Q10: Pharmaceutical Quality System. Geneva: ICH; 2008.
36. World Health Organization. WHO good manufacturing practices for pharmaceutical products: main principles. WHO Technical Report Series No. 986. Geneva: WHO; 2014.
37. U.S. Food and Drug Administration. Guidance for Industry: Investigating Out-of-Specification (OOS) Test Results for Pharmaceutical Production. Rockville (MD): FDA; 2006.
38. Sandle T. Out-of-Trend Results and CAPA Management in Pharmaceutical Industries. J Validation Technol. 2017;23(2):15-22.
39. European Medicines Agency. Guideline on Quality Risk Management. Amsterdam: EMA; 2020.
40. U.S. Food and Drug Administration. Guidance for Industry: Quality Systems Approach to Pharmaceutical CGMP Regulations. Rockville (MD): FDA; 2006.
41. Agalloco J, Akers J. Aseptic Processing: A Review of Current Industry Practice. Pharm Technol. 2015;39(6):44-52.
42. World Health Organization. Safety monitoring of medicinal products: guidelines for setting up and running a pharmacovigilance centre. Geneva: WHO; 2000.
43. Nash RA, Wachter AH. Pharmaceutical Process Validation: An International Third Edition. New York: Marcel Dekker Inc.; 2003.
44. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH Harmonised Guideline Q10: Pharmaceutical Quality System. Geneva: ICH; 2008.



45. U.S. Food and Drug Administration. Guidance for Industry: Quality Systems Approach to Pharmaceutical CGMP Regulations. Rockville (MD): FDA; 2006.
46. World Health Organization. WHO good manufacturing practices for pharmaceutical products: main principles. WHO Technical Report Series No. 986. Geneva: WHO; 2014.
47. Andersen B, Fagerhaug T. Root Cause Analysis: Simplified Tools and Techniques. 2nd ed. Milwaukee: ASQ Quality Press; 2006.
48. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH Harmonised Guideline Q9: Quality Risk Management. Geneva: ICH; 2020.
49. Nash RA, Wachter AH. Pharmaceutical Process Validation: An International Third Edition. New York: Marcel Dekker Inc.; 2003.
50. Sandle T. Corrective and Preventive Action Systems in Pharmaceutical Manufacturing. J GXP Compliance. 2017;21(3):20-28.
51. U.S. Food and Drug Administration. Warning Letters Related to CAPA Effectiveness and Quality Systems. Silver Spring (MD): FDA; 2022.
52. European Commission. EudraLex Volume 4: EU Guidelines for Good Manufacturing Practice for Medicinal Products for Human and Veterinary Use. Brussels: European Commission; 2022.
53. U.S. Food and Drug Administration. Guidance for Industry: Quality Systems Approach to Pharmaceutical CGMP Regulations. Rockville (MD): FDA; 2006.
54. Ohno T. Toyota Production System: Beyond Large-Scale Production. Portland: Productivity Press; 1988.
55. Ishikawa K. Guide to Quality Control. Tokyo: Asian Productivity Organization; 1986.
56. Stamatis DH. Failure Mode and Effect Analysis: FMEA from Theory to Execution. 2nd ed. Milwaukee: ASQ Quality Press; 2003.
57. Juran JM, Godfrey AB. Juran's Quality Handbook. 6th ed. New York: McGraw-Hill; 2010.
58. Sandle T. Root Cause Investigations and CAPA Management in Pharmaceutical Manufacturing. J GXP Compliance. 2018;22(2):14-22.
59. Vesely WE, Goldberg FF, Roberts NH, Haasl DF. Fault Tree Handbook. Washington (DC): U.S. Nuclear Regulatory Commission; 1981.
60. International Society for Pharmaceutical Engineering (ISPE). Digital Transformation and Data Integrity in Pharmaceutical Quality Systems. Tampa (FL): ISPE; 2021.
61. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH Harmonised Guideline Q9: Quality Risk Management. Geneva: ICH; 2020.
62. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH Harmonised Guideline Q10: Pharmaceutical Quality System. Geneva: ICH; 2008.
63. U.S. Food and Drug Administration. Guidance for Industry: Quality Systems Approach to Pharmaceutical CGMP Regulations. Rockville (MD): FDA; 2006.
64. World Health Organization. WHO good manufacturing practices for pharmaceutical products: main principles. WHO Technical Report Series No. 986. Geneva: WHO; 2014.
65. U.S. Food and Drug Administration. Warning Letters Related to CAPA and Quality System Deficiencies. Silver Spring (MD): FDA; 2022.
66. Sandle T. Knowledge Management and Quality Risk Management in Pharmaceutical Quality Systems. J GXP Compliance. 2019;23(1):18-27.
67. Nash RA, Wachter AH. Pharmaceutical Process Validation: An International Third Edition. New York: Marcel Dekker Inc.; 2003.
68. World Health Organization. Safety monitoring of medicinal products: guidelines for setting up and running a pharmacovigilance centre. Geneva: WHO; 2000.
69. International Society for Pharmaceutical Engineering (ISPE). Digital Transformation and Electronic Quality Management Systems in Pharmaceutical Manufacturing. Tampa (FL): ISPE; 2021.
70. World Health Organization. WHO good manufacturing practices for pharmaceutical products: main principles. WHO Technical Report Series No. 986. Geneva: WHO; 2014.
71. U.S. Food and Drug Administration. Guidance for Industry: Data Integrity and Compliance With Drug CGMP. Silver Spring (MD): FDA; 2018.
72. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH Harmonised Guideline Q10: Pharmaceutical Quality System. Geneva: ICH; 2008.
73. Medicines and Healthcare products Regulatory Agency (MHRA). GxP Data Integrity Guidance and Definitions. London: MHRA; 2018.
74. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH guideline Q10 on Pharmaceutical Quality System. Geneva: ICH; 2008.
75. U.S. Food and Drug Administration. Guidance for Industry: Quality Systems Approach to Pharmaceutical CGMP Regulations. Silver Spring (MD): FDA; 2006.
76. World Health Organization. Quality Risk Management Training Module. Geneva: WHO; 2013.
77. Patel KT, Chotai NP. Documentation and records: Harmonized GMP requirements. J Young Pharm. 2011;3(2):138-50.
78. Gupta P, Gupta V. Trend analysis and quality risk management in pharmaceutical industries. Int J Pharm Sci Rev Res. 2017;42(1):120-5.
79. Rooney JJ, Heuvel LN. Root cause analysis for beginners. Qual Prog. 2004;37(7):45-53.
80. Stamatis DH. Failure Mode and Effect Analysis: FMEA from Theory to Execution. 2nd ed. Milwaukee: ASQ Quality Press; 2003.



81. U.S. Food and Drug Administration. Guidance for Industry: Quality Systems Approach to Pharmaceutical CGMP Regulations. Silver Spring (MD): FDA; 2006.
82. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH guideline Q9 on Quality Risk Management. Geneva: ICH; 2023.
83. Stamatis DH. Failure Mode and Effect Analysis: FMEA from Theory to Execution. 2nd ed. Milwaukee: ASQ Quality Press; 2003.
84. Gupta P, Gupta V. Trend analysis and quality risk management in pharmaceutical industries. Int J Pharm Sci Rev Res. 2017;42(1):120-5.
85. Sahay A, Reddy KR. Electronic quality management systems in pharmaceutical industries: Current trends and regulatory expectations. Int J Pharm Sci Res. 2019;10(5):2100-8.
86. World Health Organization. WHO good manufacturing practices for pharmaceutical products: main principles. Geneva: WHO; 2014.
87. International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). ICH guideline Q10 on Pharmaceutical Quality System. Geneva: ICH; 2008.
88. Patel H, Shah D. Artificial intelligence and predictive analytics in pharmaceutical quality systems. Asian J Pharm Res Dev. 2021;9(4):45-51.

For any questions related to this article, please reach us at: globalresearchonline@rediffmail.com

New manuscripts for publication can be submitted at: submit@globalresearchonline.net and submit_ijpsrr@rediffmail.com

