



Collaboration, Innovation and Scientific Excellence: the European Pharmacopoeia 11th Edition

Session 2: Challenges related to the control impurities in complex APIs and excipient

Moderator: Eva Nadal, Chair of Ph. Eur. Group of Experts

THE EUROPEAN DIRECTORATE FOR THE QUALITY OF MEDICINES & HEALTHCARE (EDQM)





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Challenges in establishment of reference standards for antibiotics

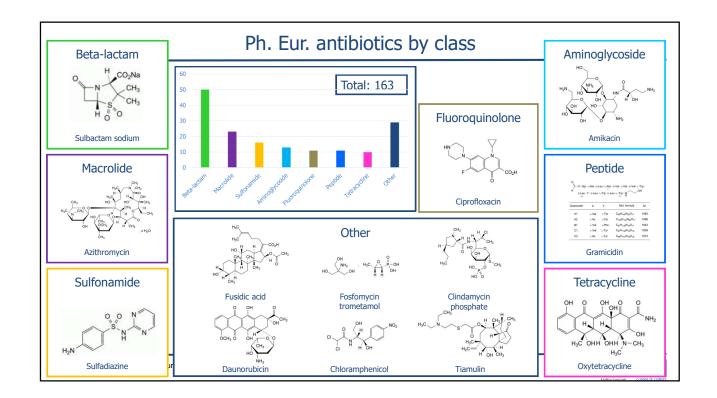
Heiko Dueckert, Laboratory Department, EDQM, Council of Europe

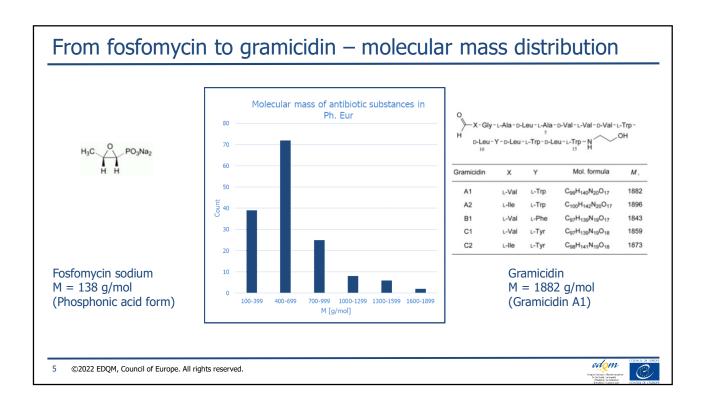
Outline

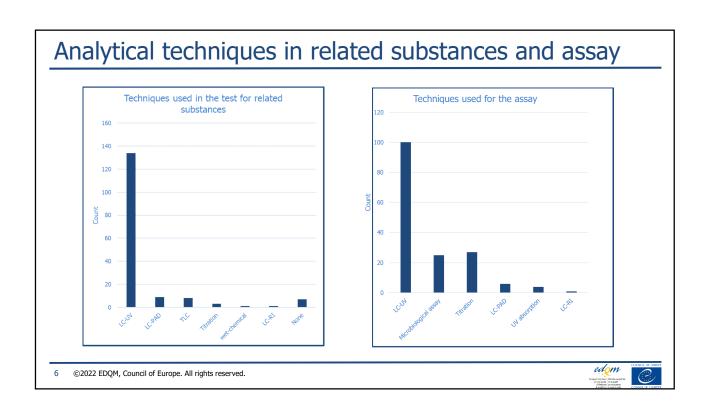
- Overview of antibiotics in Ph. Eur.
 - Classes
 - Structural complexity
 - · Heterogeneous nature
- Techniques for assay and related substances
 - Variety of techniques
 - Complexity of mixture CRS
- Challenges CRS Examples
 - Fosfomycin trometamol
 - · Clindamycin Phosphate for system suitability
 - · Cefoxitin for peak identification A
 - · Piperacillin for peak identification
 - Teicoplanin for identification
- Summary
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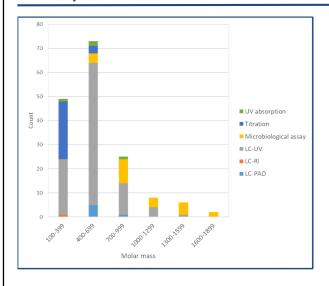








Assay methods



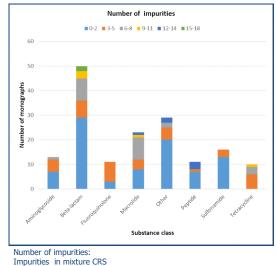
- Low molecular mass: LC-UV and titration
 - Titration based on functional group
- Middle molecular mass: Predominantly LC-UV
 - Single substances or well-defined mixtures
- High molecular mass: Predominantly microbiological assay
 - Heterogeneous mixtures of active substances

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Complexity of CRSs - Number of impurities per monograph



Number of impurities Piperacillin 18 14 Azithromycin Vancomycin 13 13 Bacitracin Fusidic acid

(number of specified impurities) - (number of impurities in CRS)

Missing Impurities

Monograph name: without counter ion/hydration

Number of impurities in monograph - Top 5 Monograph name

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+ single substance (CRS and R)





General challenges in establishment of antibiotics CRS

- Analytical / technical challenges
 - Stability of solutions
 - · Beta lactams
 - Hygroscopic substances
 - Aminoglycosides
 - Physical form (e.g. sticky solids)
 - Monograph methods are developed for quality control, not for CRS establishment
- Stock management
 - Stability of CRS during storage and transport
 - Example: degradation of impurity F in procaine benzylpenicillin for peak identification
 - Availability of candidate material
 - Azithromycin for peak identification (containing impurities A, B, C, E, F, G, I, J, L, M, N, O and P)

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Examples

- Fosfomycin trometamol CRS
- Clindamycin phosphate for system suitability CRS
- Cefoxitin for peak identification A CRS
- Piperacillin for peak identification CRS
- Teicoplanin for identification CRS



Fosfomycin trometamol CRS

- Fosfomycin trometamol CRS used for LC assay
- Small molecule
 - Fosfomycin is the smallest molecule in Ph. Eur. antibiotics portfolio
- LC-RI method for assay and related substances
 - Low performance of detection technique (lack of sensitivity)

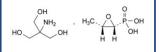
Challenge: **Assignment of content**

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Fosfomycin trometamol CRS – mass balance



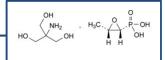
- Calculation of content, based on monograph methods
- Mass balance approach: $(100\% \text{water}\%) \times (100\% \text{related substances}\%) / 100\% = 99.8 \%$

| Monograph methods | Relevant for content assignment | |
|---------------------------|---------------------------------|--|
| Identification A, B, C | No | |
| рН | No | |
| Specific optical rotation | No | |
| Related substances | Yes (0.14 %) | |
| Water | Yes (0.08 %) | |
| Assay | Yes (verification only) | |





Fosfomycin trometamol CRS - qNMR



• qNMR results (% m/m):

• Fosfomycin: 52.4 %

Trometamol: 47.3 %

• Fosfomycin + Trometamol: 99.7 %

Molar fractions:

• Fosfomycin: 3.80 mmol/g • Trometamol: 3.90 mmol/g

Excess trometamol: 1.3 % m/m

Mass balance approach (amended):

(100% - water% - excess trometamol%) x

(100% - related substances%) / 100% = **98.5** %

 $C_3H_7O_4P$ M = 138.06 g/mol

 $C_4H_{11}NO_3$ M = 151.12 g/mol

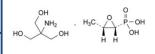
NH₂

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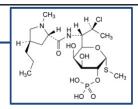
Fosfomycin trometamol CRS - conclusion



- The monograph is suitable to control the API's quality
 - Monograph methods alone (without the assay) are not sufficient for content assignment
- Complementary methods were required for content assignment
- Controlling the quality of a batch according to the Ph. Eur. and characterising a CRS candidate for content assignment are two different activities

Clindamycin Phosphate for System Suitability

Reference solution (c). Dissolve 3.0 mg of clindamycin phosphate for system suitability CRS (containing impurities **B, E, F, G, I, J, K and L**) in mobile phase A and dilute to 1.0 mL with mobile phase A.

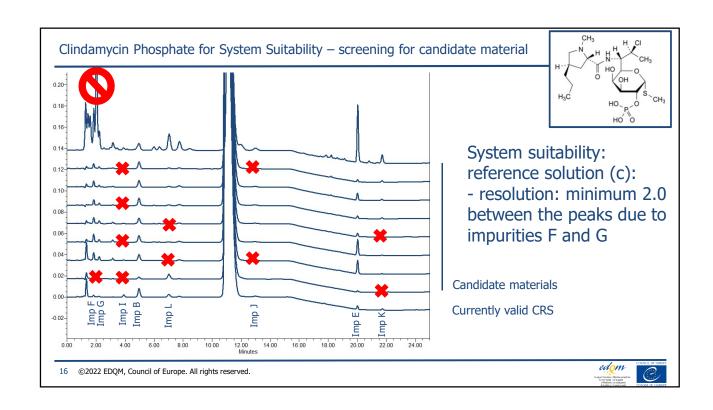


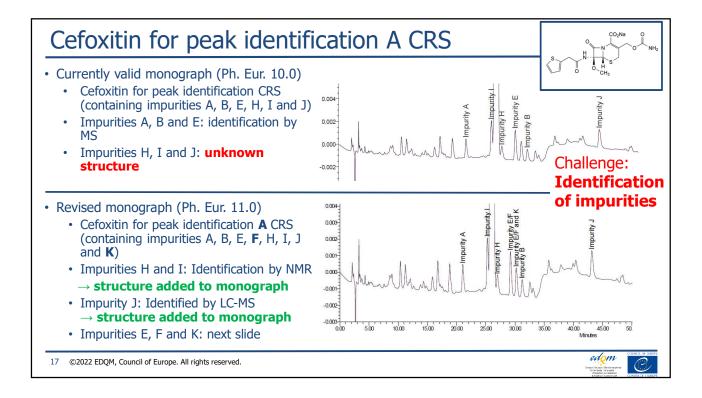
Challenge: **Suitability of material**

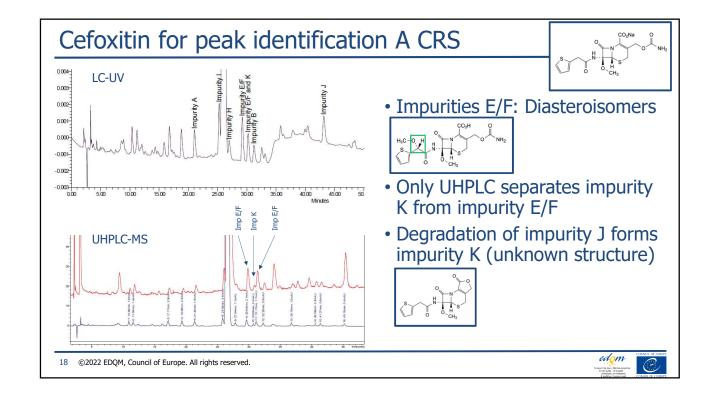
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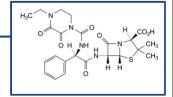






Piperacillin for peak identification CRS

- Draft monograph (Pharmeuropa 29.3)
 - Reference solution (e). Dissolve 6 mg of piperacillin for peak identification CRS (containing impurities A, B, C, D, E, F, G, I, J, K, L, M, O, P, Q, R, S and T) in mobile phase B and dilute to 1 mL with mobile phase B.
 - mobile phase A: mix 3 mL of a 320 g/L solution of tetrabutylammonium hydroxide R, 100 mL of a 27.6 g/L solution of sodium dihydrogen phosphate R, 275 mL of methanol R1 and 622 mL of water for chromatography R; adjust to pH 5.5 with phosphoric acid R

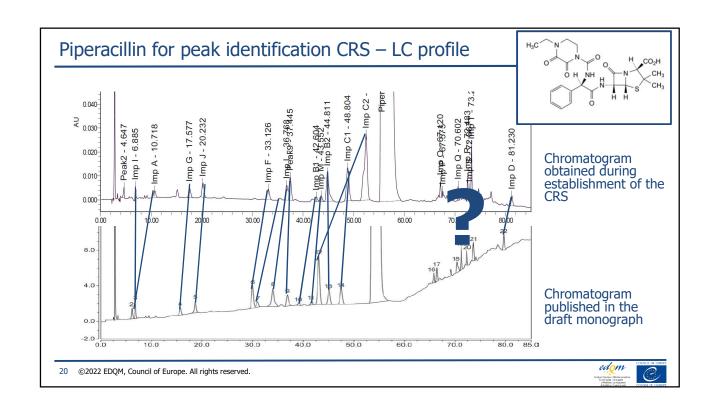


Challenge: **Identification of impurities**

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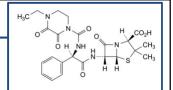






Piperacillin for peak identification CRS – amendment of monograph

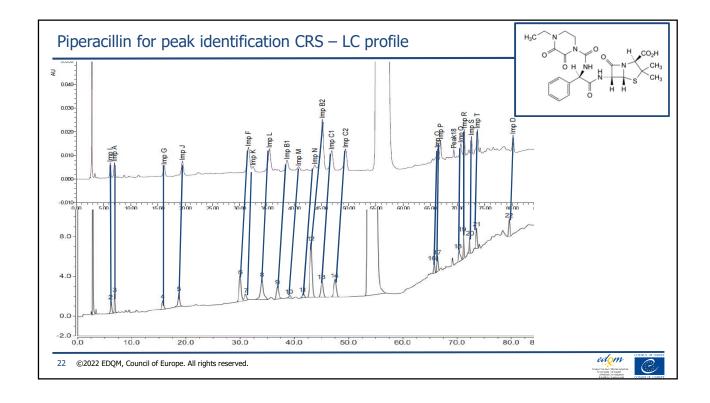
- Monograph published (Ph. Eur. 10.4)
 - mobile phase A: mix 3 mL of a 320 g/L solution of tetrabutylammonium hydroxide R, 100 mL of a 27.6 g/L solution of sodium dihydrogen phosphate R, 275 mL of methanol R1 and 622 mL of water for chromatography R; adjust the apparent pH to 5.5 with phosphoric acid R



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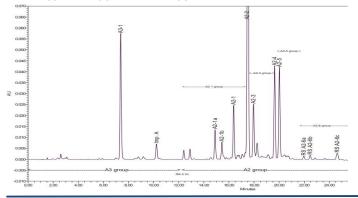


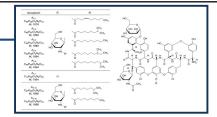




Teicoplanin for identification CRS

- Teicoplanin components $A_{3\text{-}1}$, $A_{2\text{-}1a}$, $A_{2\text{-}1b}$, $A_{2\text{-}1}$, $A_{2\text{-}2}$, $A_{2\text{-}3}$, $A_{2\text{-}4}$ and $A_{2\text{-}5}$
- Teicoplanin-like related substances A_{2-6a} , A_{2-6b} and A_{2-6c}





Challenge: **Identification of impurities**

- Method transfer: LC-UV towards MS-compatible
- Identification of components by MS-MS

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CRS challenges - Summary

- Selection of methods beyond the monograph
 - Non-mass balance indicating monographs
 - Need for orthogonal methods
- Availability of suitable candidate materials (incl. mixtures)
 - Possible solution: Compounding
 - Custom synthesis
- Identification of impurities
 - Structural complexity and heterogeneity of analytes
 - Availability of authentic impurity samples
- Highly specific methods
 - Necessary to fulfil regulatory demands
 - Often come at the price of robustness



Thank you for your attention



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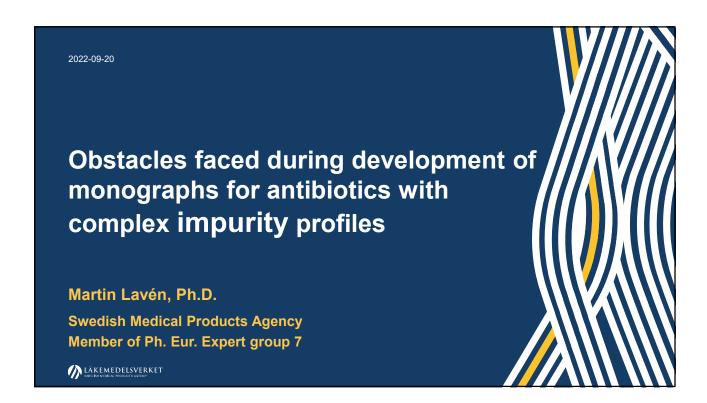
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Ph. Eur. group of experts No 7: Antibiotics

- Aim of the work: development and revision of monographs for the control of quality of medicines
- Scope: Antibiotics, antifungals, antiparasitics, immunosuppressants, chemotherapeutic substances
- 19 members from industry, academia and authorities (regulators and OMCLs*)

*Official medicines control laboratories

Antibiotics: a broad range of substances

- · Substances active against bacteria, used to treat bacterial infections
- · Classes of antibiotics
 - \circ β -lactams, tetracyclines, aminoglycosides, polypeptides, macrolides etc.
- Complexity
 - o Single compound (eg phenoxymethylpenicillin)
 - Family of compounds, mixture of closely related compounds (eg colistimethate sodium, tyrothricin)
- Production
 - Chemical synthesis (eg chloramphenicol)
 - o Semi-synthetic: fermentation products modified by synthetic steps (eg amoxicillin)
 - o Fermentation (eg bacitracin)



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Guidelines for organic impurities in antibiotics

- ICH Q3A and General monograph Substances for pharmaceutical use (2034)
 - Requirements for Related substances <u>do not apply</u> to products of fermentation and semisynthetic products derived therefrom
- Active substances for veterinary use: VICH Guideline 10
 - o Not applicable to fermentation products and semi-synthetic products derived therefrom
- Guideline on setting specifications for related impurities in antibiotics (EMA)
 - Applies to Related impurities in antibiotics that are fermentation products or semi-synthetic substances derived from fermentation products
- Additional guidelines for impurities (not covered here)

(eg elemental impurities, residual solvents, mutagenic impurities, residues from fermentation)

Guideline on setting specifications for related impurities in antibiotics

EMA/CHMP/CVMP/QWP/199250/2009 corr

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- Applies to fermentation products or semi-synthetic substances
- · New active substances and new sources of existing substances
- Should not be applied retrospectively, but "it is intended that this
 guideline will act as a stimulus to establish best practice and to
 initiate the revision of relevant Ph.Eur. monographs".
- Implemented 30 June 2013



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Guideline on setting specifications for related impurities in antibiotics EUROPEAN MEDICINES AGENCY

· Limits for:

As described in ICH Q3A

- o Each specified identified impurity
- Each specified unidentified impurity
- Any unspecified impurity, with an acceptance criterion of not more than the identification threshold
- Total impurities

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Guideline on setting specifications for related impurities in antibiotics: *classification*

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- Semi-synthetic:
 - o single compound
 - o family of compounds
- · Fermentation:
 - o single compound
 - o family of compounds
- Peptides
- Veterinary only
- Special cases for very complex impurity profiles

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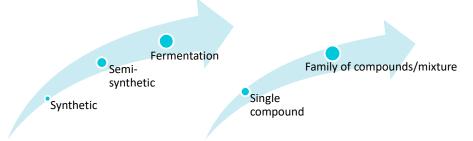
Thresholds

| Class | | Thresholds | | |
|------------------------|------------|----------------|---------------|--|
| | Reporting | Identification | Qualification | EUROPEAN MEDICINES AGENCY |
| Semi-synthetic: single | 0.05/0.03% | 0.10/0.05% | 0.15/0.05% | ICH Q3A thresholds |
| Semi-synthetic: family | 0.10% | 0.15% | 0.50/0.2% | 0.50%: for structurally closely related impurities |
| Fermentation: single | 0.10% | 0.15% | 0.15% | |
| Fermentation: family | 0.10% | 0.15% | 0.50/0.2% | 0.50%: for structurally closely related impurities |
| Peptides | 0.1% | 0.5% | 1.0% | Not for modified peptides (eg glycopeptides) |
| Veterinary only | 0.10% | 0.20% | 0.50% | VICH GL 10 |

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Development of monographs: challenges

· Antibiotics can display very complex impurity profiles



- · One related substances method for all sources
 - Different production processes lead to different impurity profiles
 - Monographs for multi-source antibiotics may need to cover very complex impurity profiles



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Challenges: the analytical method

- High demands on the analytical method
- Needs to separate a high number of impurities
- Sufficient sensitivity needed for detection and quantification
- Robustness may be difficult to achieve when the impurity profile is very complex

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Challenges: identification of impurities

- Some impurities cannot be isolated (eg isomers, unstable)
- Difficulties to obtain batches and impurity standards from manufacturers
- A low limit for unspecified impurities may lead to a great number of specified impurities
- Consequences
 - o Method development and validation can be very complicated
 - o CRS establishment can be very challenging
 - o Correction factors cannot be used
 - Identification of impurities using RRT by the user of the monograph may lead to wrong peak assignment



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How obstacles can be tackled: id of impurities

- Make use of the fact that antibiotic batches often contain a number of impurities that can be used for peak identification or use "dirty batches"
- Using LC-MS and NMR for peak identification and quantification in method development and validation
- The intended limit for unspecified impurities, in line with the EMA guideline, may need to be raised in order to decrease the number of specified impurities
- In situ degradation to generate impurities



How obstacles can be tackled: the method

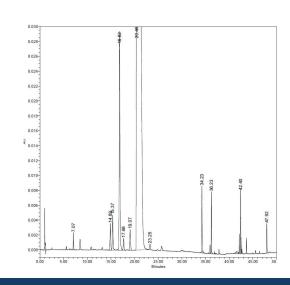
- Use of modern techniques such as UHPLC and new column chemistries to improve separation and sensitivity
- Use of other detection techniques than UV, such as MS, for antibiotics with weak chromophores
- Robustness
 - The method should be tested by at least two different labs before publication in Pharmeuropa
 - o Read Pharmeuropa and test the method in time!



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How obstacles can be tackled

- Ongoing project:
 - o Fermentation product
 - o UHPLC
 - o Batches containing impurities
 - o LC-MS (QTOF)
 - NMR



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Other strategies to handle complex profiles

- Composition test in combination with related substances test
 - Colistimethate sodium (0319):

Composition. Liquid chromatography (2.2.29): use the normalisation procedure.

- CMS E1ASM8: 5.0 per cent to 9.5 per cent;
- CMS E1ASM6: 6.5 per cent to 9.5 per cent;
- CMS E1ASM4: 2.0 per cent to 5.0 per cent;
- CMS E2ASM8: 0.5 per cent to 2.0 per cent;
- CMS E2ASM6: 0.5 per cent to 2.5 per cent;
- CMS E2ASM4: maximum 1.5 per cent;
- sum of the peaks related to CMS E1 and CMS E2: minimum 77.0 per cent;
- disregard limit: 0.50 per cent.

Related substances. Liquid chromatography (2.2.29) as described in the test for composition.



- any other impurity (any peak not related to CMS E1 or CMS E2): for each impurity, maximum 1.5 per cent;
- sum of impurities (sum of all peaks not related to CMS E1 or CMS E2): maximum 5.5 per cent;
- disregard limit: 0.50 per cent.



Other strategies to handle complex profiles

- Limit as a sum of impurities
 - Oxytetracycline hydrochloride (0198):
 - "sum of impurities D, E and F: maximum 1.0 per cent"
- A retention time window controlling certain impurities
 - Vancomycin hydrochloride (1058):
 - "any other impurity eluting before vancomycin B: for each impurity, maximum 0.8 per cent, and not more than 5 such impurities exceed 0.30 per cent"
 - Tylosin for veterinary use (1273):
 - "sum of impurities eluting between impurity A and tylosin C: maximum 2.0 per cent"



Other strategies to handle complex profiles

- · Sometimes unknown impurities as specified
 - o Caspofungin acetate, impurity D (Pharmeuropa 34.1):
 - "unknown structure (dimer)"
- Separate test for "difficult" impurity
 - o Caspofungin acetate, impurity F (Pharmeuropa 34.1)
- Related substances tests not covering all impurities?
 - o For complex multi-source antibiotics. Some potential future options:
 - One test for degradation impurities (same for all processes)
 - One test for degradation impurities and common process related impurities
 - Multiple related substances methods covering different sets of impurities

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The amoxicillin case

- How trihydrate Hoose Hoo
- Multi-source semi-synthetic antibiotic
- Each production process generates an impurity profile which is manageable
- Combining all impurities leads to a very complex impurity profile
- Current monographs, limits:

Trihydrate:

- o Any impurity ≤1%
- No specified impurities
- o No limit for Total impurities
- No reporting threshold

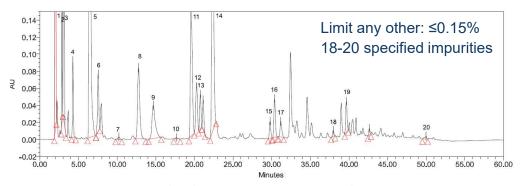
Sodium:

- o Any other impurity: ≤2%
- o Impurity J: ≤3%
- o Total impurities: ≤9%
- o Disregard limit: 0.1%

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The amoxicillin case

• Publication in Pharmeuropa 26.2 (2014) of new related substances method



Not possible to prepare CRSs to cover all specified impurities



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The amoxicillin case

- Increased limit for any other impurities: ≤0.30%:
- → 8 10 specified impurities

Sodium:

Limits:

- *impurity J*: maximum 2.0 per cent;
- impurity D (sum of isomers D1, D2): maximum 1.5 per cent;
- impurities C (sum of isomers C1, C2), E (sum of isomers E1, E2), G: for each impurity, maximum 1.0 per cent;
- sum of impurities F and P: maximum 0.6 per cent;
- impurities K, L: for each impurity, maximum 0.5 per cent;
- impurity N: maximum 0.4 per cent;
- any other impurity: maximum 0.30 per cent;
- total: maximum 4.0 per cent;
- reporting threshold: 0.05 per cent.

Trihydrate:

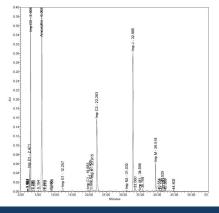
Limits:

- impurity E (sum of isomers E1, E2): maximum 1.5 per cent;
- impurities C (sum of isomers C1, C2), D (sum of isomers D1, D2), G, I, J: for each impurity, maximum 1.0 per cent;
- impurity L: maximum 0.5 per cent;
- impurity N: maximum 0.4 per cent;
- any other impurity: maximum 0.30 per cent;
- total: maximum 3.5 per cent;
- reporting threshold: 0.05 per cent.
- Monographs adopted by Commission in 2015
- Establishment of CRSs still in progress



The amoxicillin case

- In situ degradation can generate a number of impurities
- · Additional CRSs to cover other impurities
- · Combination of these approaches promising



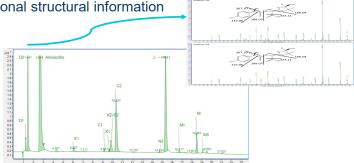
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The amoxicillin case

- Using LC-MS/MS in development for identification of impurities
 - o Transfer to MS compatible conditions
 - o Accurate mass instrument (mass deviations typically within 2 ppm)
 - o MS/MS for additional structural information



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Final remarks

- Can the perfect monograph for control of related impurites be reached?
- New impurities to be added to the monograph via the CEP process
- Stepwise approach
- Obstacles can be succesfully tackled for antibiotics with very complex impurity profiles
 - Colistimethate sodium (0319)
 - o Piperacillin sodium and monohydrate (1168 & 1169)
 - Vancomycin hydrochloride (1058)



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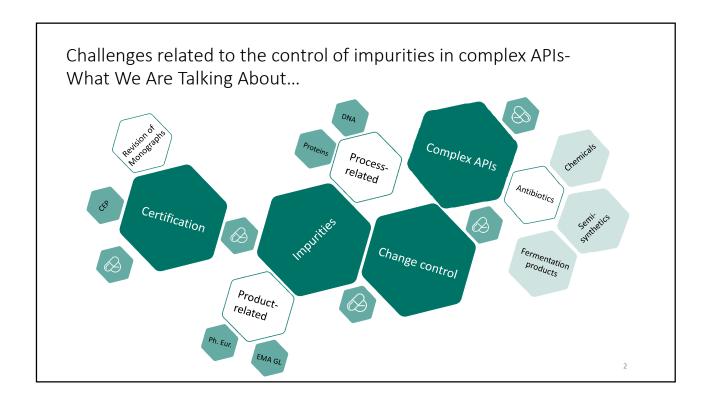
Summary

- Aim: new and improved monographs for the control of quality of antibiotics
- · Antibiotics can display very complex impurity profiles
- One related substances test for all sources increases complexity
- Challenges analytical, practical and limit related
- Overcoming obstacles: Use of modern techniques, inherent complexity of batches, and different approaches to handle limits
- Improvement of monographs is a continous process

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Certification

- · Certification of suitability to Monographs of the European Pharmacopoeia
- Acc to Public Health Committee 2 Resolution AP-CSP (07) 1)
- · To obtain a CEP
- · Relates to API/DS only, not to the FP (route of administration is normally not an issue for certification)
- Majority of APIs are obtained from chemical synthesis

COUNCIL OF EUROPE

PUBLIC HEALTH COMMITTEE

(Partial Agreement)

RESOLUTION AP-CSP (07) 1

(adopted by the Public Health Committee (Partial Agreement) (CD-P-SP) on 21/02/2007)

The Public Health Committee (Partial Agreement) (CD-P-SP) consisting, for the purposes of the Convention on the Elaboration of a European Pharmacopoeia, of delegations appointed by the Parties to the said Convention, namely the delegations of Austria, Belgium, spoonia and Herzegovina, Bulgaria, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Bollowin and Herzegovina, Bulgaria, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Cetedand, Iralya, Cateco, Hungary, Creece, Hungary, Creece, Hungary, Creece, Hungary, Creece, Hungary, Poland, Portugal Romania, Steptia, Stovak Republic, Slovenia, Spain, Sweden, Stovak Republic, Slovenia, Spain, Sweden, Iralya, Charles Mandalon, Categoria, Categoria,

Considering the implementation of the Procedure for the certification of suitability of monographs of the European Pharmacopoeta adopted on 1 July 1993 by the Public Health Committee (Partial Agreement) (CD-P-SP) in its resolutions AP-CSP (93) 5 and revised on:

- 4 October 1996 Resolution AP-CSP (96) 5. 8 May 1998 Resolution AP-CSP (98) 2. 22 December 1999 Resolution AP-CSP (99) 4,

Having regard to the decision taken by the European Pharmacopoeia Com n of November 2006 to update and complete the resolution AP-CSP (99) 4;

Has therefore decided to amend the resolution AP-CSP (99) 4 and to replace it by the text

Antibiotics

Chemical

 Sulfonamides (Sulfanilamide)

Ciprofloxazin



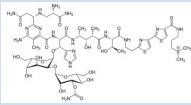
Semi-synthetic

- o Amoxicillin and its salts (from 6-
- Clindamycin hydrochloride and clindamycin phosphate (from lincomycin)
- Netilmicin (from sisomycin which has no Ph. Eur. Monograph)
- · Roxithromycin (from erythromycin)

 Amikacin and amikacin sulphate (both from kanamycin)

Fermentation

- Erythromycin
- Nystatin
- Amphotericin
- Spiramycin
- Neomycin
- ∘ Polymyxin B
- Chlortetracycline
- · Gramicidin
- · Bleomycin



• Salt formation: benzylpenicillin sodium, benzylpenicillin benzathine, demeclocycline hydrochloride, erythromycin stearate, framycetin sulphate, gentamicin sulphate, lincomycin hydrochloride, kanamycin monosulphate, oxytetracycline hydrochloride, phenoxymethylpenicillin K...

Fermentation products and semi-synthetic products

- Fermentation products are "Indirect gene products"
- Primary or secondary metabolites of micro-organisms, irrespective of whether or not the microorganism have been modified by traditional procedures or by recombinant DNA technology
- GM 1468 "Products of Fermentation" applies
- **Semi-synthetic products** are obtained from a fermentation product + cleavage and formation of covalent bonds followed by extraction/purification steps
- Compliance with GM 1468 is not an issue



04/2022:1468

PRODUCTS OF FERMENTATION

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Product-related impurities and its control

- GM 2034 (reflecting ICH Q3A) and Ph. Eur. general chapter 5.10 (incl decision tree) requirements are to be applied
- Products of fermentation and semi-synthetic products are OUT of the scope of ICH Q3A and of GM 2034 "Related substances" section
- Fermentation processes involve biological processes, which are more variable and less controllable than synthetic processes and the impurity profile is more complex and less predictable
- Apply the GL on "Setting specifications for related impurities in antibiotics"
 (EMA/CHMP/CVMP/QWP/199250/2009 corr.) for product-related impurities control in antibiotics

Antibiotics GL and GM2034

| Active substances | Semi-synthetic*/ GM 2034/ ≤ 2g / > 2g MDD | Fermentation, single*** | Fermentation, family**** | Peptides/ Peptides per GM2034 |
|----------------------|---|-------------------------|-----------------------------|----------------------------------|
| Reporting | 0.05% / 0.03% | 0.10% | 0.10% | 0.1% |
| Identification | 0.10% / 0.05% | 0.15% | 0.15% | 0.5% |
| Qualification | 0.15% / 0.05% | 0.15% | 0.50%**/0.2% | 1.0% |

^{*)} If the substance consists of a family of compounds, then thresholds for fermentation, family may be necessary

7

Fermentation "Family" of Compounds

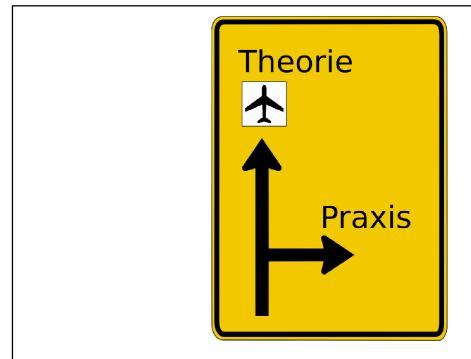


- Higher qualification threshold of 0.50%, if an impurity is structurally closely related to an active substance containing more than one active compound
- All related compounds not included in the definition of the active substance are regarded as impurities
- Control of very complex impurity profiles requires extended efforts (e.g., in resolution of unresolved peaks, identification and qualification of new peaks, fingerprint chromatogram approach)

^{**)} Structurally closely related impurity according to definition

^{***)} single substance

^{****)} mixture of closely related compounds



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Setting of Specifications: Ampicillin trihydrate

H NH₂ H S CH₃ 3 H₂O

Semi-synthetic, single component

Ph. Eur.*: Related substances by LC, "Any impurity" limit **1.0** %, transparency list with impurities A-N

GL: Report limit 0.05%/ 0.03%, Identification limit **0.10%/ 0.05**%

Guideline is stricter than the Monograph

CEP1: <u>Any unspecified impurity</u> detected by the test for related substances of the monograph is limited to <u>NMT 0.10%</u>, <u>total impurities</u> are limited to <u>NMT 2.0%</u>

CEP2: <u>Any unspecified impurity</u> detected by the test for related substances of the monograph is limited to <u>NMT 0.20%</u>, <u>total impurities</u> are limited to <u>NMT 2.5%</u>

Note: Analytical LoQ should be NMT reporting threshold.

* Monograph under revision

Tobramycin

Fermentation, single

Ph. Eur.*: Related Substances by LC: "Any impurity" limit 1.0% and 0.5 %

Total limit: 1.5% Disregard Limit 0.25%

Transparency list with impurities A-C

GL: Report limit 0.10%, Identification limit 0.15%

HO HO NH₂

Guideline is stricter than the Monograph

CEP: - Test for related substances by liquid chromatography

Impurity RRT
Impurity RRT

Any unspecified impurity Total unspecified impurities Total impurities not more than 0.7% not more than 0.15% not more than 0.1% not more than 0.1% not more than 0.2% not more than 1.5%

* Monograph under revision

11

Doxorubicin HCl

Fermentation, single

Ph. Eur.: Related Substances by LC: "Any impurity" limit 0.5 %

Disregard Limit 0.05%

Transparency list with impurities A-D

 $\textbf{GL:} \ \textbf{Report limit 0.10\%, Identification limit 0.15\%}$

CEP: "Any unspecified impurity" NMT 0.10%

- "Any unspecified impurity" limit: 0.15% (GL), NMT 0.10% on the CEP

Clarithromycin

Semi-synthetic, family of closely rel compounds

Ph. Eur.: Related Substances by LC with disregard limit 0.1%

"Any impurity" \leq 1.0%, not more than 4 impurities can be \geq 0.4%

"Total impurities" ≤3.5%

Specified impurities A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P

 $\textbf{GL:} \ \textbf{Report limit 0.10\%, Identification limit 0.15\%}$

CEP: "Any unspecified impurity" NMT 0.10%

"Any unspecified impurity" limit: 0.15% (GL), 0.10% on the CEP

Limits in the EMA GL may be different to the Ph Eur Monograph/CEP

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Process-related Impurities

- Residual solvents, Elemental impurities, Nitrosamines...
- For antibiotics made by fermentation:
 - Foreign microorganisms!
 - Endotoxins, toxins
 - Host cell residues (residual NA and proteins)
 - Residuals of culture media, substrates and precursors

Limits for Residual Proteins and NA

- Threshold assay to demonstrate absence of residual proteins (e.g., SDS-PAGE) and NA (e.g., PCR)
- Present batch data together with analytical method (description, LoD/LoQ)
- No specific toxicological concerns for residual proteins
- For commercialised API, HCP and NA levels are considered "qualified by use"
- If new API, apply GM 2034 limits (identification threshold 0.10%/0.05%), if limit is exceeded, a justified limit and valid analytical test is requested for the CEP

15

GM 1468: Change Control

- Change in the manufacturing procedure (upstream/downstream)
- Replacement of the MCB, envisaged "Rejuvenation of MCB", "re-isolation of MCB"...
- → Subsequent change in the impurity profile of the fermentation product?
- Acceptability of the increase of impurities already present?
- Any new impurities? Adequately controlled using additional/alternative tests?
- Risk mitigation strategy?
- For cell banks: Testing of genetic stability <u>and</u> impurity profile investigation,
 MCB shall be sufficently large...

Histamin

- Adverse events after iv injection of gentamicin since 2015 in horses and in humans
- Main ADRs in humans: decreased blood pressure, allergic reactions, one fatality (in Italy);
 In horses: anaphylactic reactions, colic
- · Gentamicin of one manufacturer was affected
- High contents of histamine/histamine like substances were found in suspicious batches, clear correlation between histamine concentration and ADRs
- · Histamine levels were linked to fish peptone raw material of a certain supplier used for fermentation
- → API manufacturer changed back to the original supplier for fish peptone
- → Development of HPLC/LC-MS anal method to identify and quantify histamine
- → EP GM 1468 (Products for fermentation) amended by EDQM in 2018
- → Histamine limit of 8 ppm implemented in CEP for gentamicin sulphate EMEA/H/A-5(3)/1468: EMA/805330/2018; EMEA/V/A/128: EMA/CVMP/766265/2018 https://doi.org/10.1002/ardp.202100260



4-

Tryptophan

- Multisystemic desease Eosinophilie-Myalgie Syndrome (EMS) affecting approx. 1600 persons incl 38 deaths
- Traced back to Tryptophan (≥98.5% purity) manufactured by fermentation
- Contaminants? Impurity profile?- RP-HPLC/UV/Fluorescence study reveal > 60 impurities
- Prior modifications in the producer strain (5 mutations) and in the downstream processing (reduced amount of charcoal) and specific NEW impurities were found being linked to EMS
- ullet o New requirements in Ph Eur Tryptophan Monograph

J.Chromatogr. B 685 (1996) 41-51

Revision of Ph Eur Monograph

- Information becomes available about the profile of API, new peaks detected
- Share information with the Ph Eur experts
- Request for a revision of Monograph to include limits for new identified/qualified impurities



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Summary

- · Certification relates to API/DS only
- · Antibiotics are manufactured either chemically, fermentative or by semi-synthetic processes
- GM2034 and EMA antibiotics GL wrap up the current requirements wrt to report/identify/qualify of impurities in antibiotics
- Control of product-rel impurites is more challenging the more complex the API is
- · Control of very complex impurity profiles requires extended efforts
- Limits in the EMA antibiotics GL may be different to the Ph Eur Monograph
- Control of process-related impurities in fermentation products
- "Change control", "Rejuvenation" of MCB Stay alert and watch out the consequences!
- In case of new impurites, request for revision of Ph Eur Monograph

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Thank you very much for your attention!









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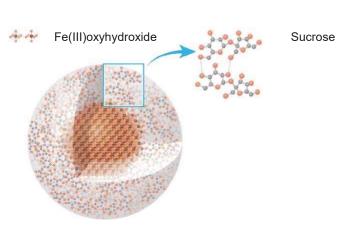
Challenges in setting standards for non-biological complexes

Iron sucrose story

Dr. Erik Philipp
Scientific Director Iron &
Head of Chemical
Development
CSL Vifor Ltd.
Member of the NBC
working group

Iron sucrose

Setting standards for iron sucrose by establishing a monograph for 'iron sucrose concentrated solution'



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2

BUSINESS USE

Starting point: USP Monograph Iron Sucrose Injection

3406 Iron / Official Monographs

Iron Sucrose Injection



Iron Sucrose Injection is a sterile, colloidal solution of ferric hydroxide in complex with Sucrose in Water for Injection. It contains not less than 95.0 percent and not more than 105.0 percent of the labeled amount of iron. Sodium Hydroxide may be added to adjust the pH. It contains no antimicrobial agent, chelating agent, dextran, gluconate, or other added substances.

Official from December 1, 2014 Copyright (c) 2014 The United States Pharmacopeial Convention. All rights reserved.

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Parameters and Limits from USP DP Monograph

| Parameter | Method | | Specified Limits | Comment |
|-----------------------------------|--|-----------------------------------|---|---|
| Molecular weight determination | Size Exclusion Chromatography | | Mw = 34'000 Da − 60'000 Da Mn ≥ 24'000 Da P = Mw/Mn ≤ 1.7 | Chromatography columns and conditions had to be evaluated |
| Alkalinity | Titration | | 0.5 – 0.8 ml 0.1 N HCl/ ml Injection | |
| Turbidity point | Titration | | pH = 4.4 – 5.3 | |
| Reduction potentials | | Fe(III) / Fe (II) Fe(II) / Fe (0) | $-750 \pm 50 \text{ mV}$ - 1400 $\pm 50 \text{ mV}$ | Different values, depending on equipment |
| Iron(II) | Polarography | | ≤ 0.4 % m/V | Quantification insufficient |
| Iron (Assay) | Complexometric titration or atomic absorption spectroscopy | | 1.9 – 2.1 % m/V | |
| Sucrose (Assay) | HPLC | | 260 mg – 340 mg per ml | |

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Iron sucrose concentrated solution is a drug substance!

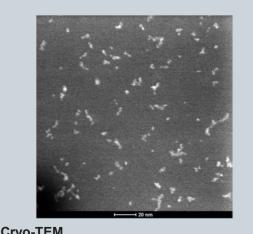
- ▶ Products of different drug substance suppliers differ in parameters such as
- Concentration (2 5 % m/V Fe)
- pH (10.0 11.1)
- Chloride content
- Molecular weight
- Viscosity, Density

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Iron sucrose: From Tyndall effect to nanoparticles



TYNDALL EFFECT

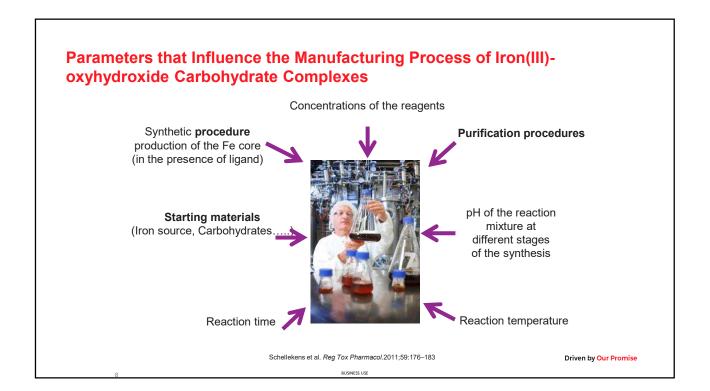


Cryo-TEM

NBCD A non-biological complex drug product...

- ... is a synthetic medicinal product that is not a biological Medicine
- ... with an active substance that is not homo-molecular but contains different (closely related, often (nanoparticulate) structures
- ... that cannot be fully characterized by physicochemical analytical means.





FDA's factors for assessment of nanomaterials

Drug Products, Including Biological Products, that Contain Nanomaterials Guidance for Industry

- 1. Adequacy of characterization of the material structure and its function
- 2. Complexity of the material structure
- 3. Understanding of the mechanism by which the physicochemical properties of the material impact its biological effects (eg effect of particle size on PK parameters)
- 4. Understanding the in vivo release mechanism based on the material physicochemical properties
- 5. Predictability of in vivo release based upon established in vitro release methods
- 6. Physical and chemical stability
- 7. Maturity of the nanotechnology (including manufacturing and analytical methods)
- 8. Potential impact of manufacturing changes, including in-process controls and the robustness of the control strategy on critical quality attributes of the drug product
- 9. Physical state of the material upon administration
- 10. Route of administration
- 11. Dissolution, bioavailability, distribution, biodegradation, accumulation and their predictability based on physicochemical parameters and animal studies

FDA Nanomaterials Guidance 2022

FDA Nanomaterials Guidance 2023

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EMA Reflection Paper



26 March 2015

EMA/CHMP/SWP/620008/2012

Committee for Medicinal Products for Human Use (CHMP)

Reflection paper on the data requirements for intravenous iron-based nano-colloidal products developed with reference to an innovator medicinal product

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Challenges to overcome

Simple use the procedures described in USP was not possible

- ➤ USP describes medicinal product Iron sucrose injection with the fixed concentration (20 mg/mL) whereas Ph. Eur. would describe Iron sucrose concentrated solution
- > Several manufacturers in the European market with the solutions containing different concentrations
- > The monograph should be applicable for a range of concentrations
- > Additional requirements by EMA reflection paper (particle size, labile iron, amount of divalent and trivalent iron)
- > Products on the market were registered without quality requirements for additional tests listed in EMA reflection paper, the group has no information on the acceptable specification limits

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Particle size distribution by SEC

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Diapositive 11

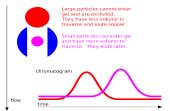
PV1 if you would think of anything else please add PETRUSEVSKA Valentina; 14/09/2022

SEC (Size Exclusion Chromatography)

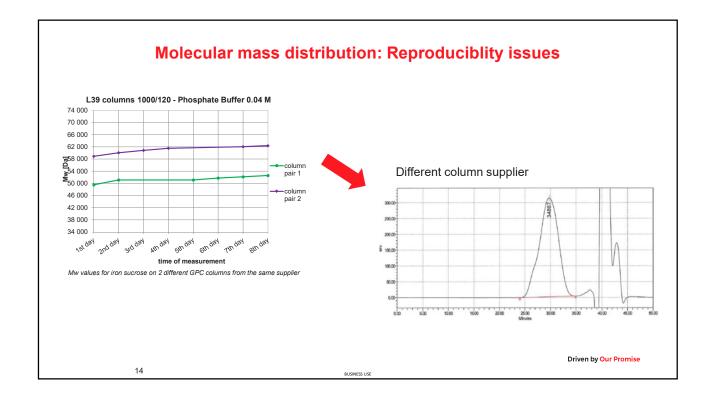
Separation of molecules on the base of their size (and shape)



13



| Chromatographic parameter | USP requirement | |
|---------------------------|--|--|
| Mobile Phase | Dissolve 7.12 g of dibasic sodium phosphate dihydrate, 5.52 g of monobasic sodium phosphate and 0.40 g of sodium azide in 2L of water | |
| Flow rate | 0.5 mL/min | |
| Column | Packing: L39 (Hydrophylic polyhydroxymethacrylate gel of totally porous spherical resin Type: 7.8 x 300 mm Pore size: 1000 Å and 120 Å | |



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Particle size distribution by Dynamic Light Scattering (DLS)

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Particle size determination by DLS B 30 Size distribution by intensity Phydrodynamic diameter [mi] D 1 Francesco, T., Borchard, G., 2018. A robust and easily reproducible protocol for the determination of size and size distribution of fron sucrose using dynamic light scattering. Driven by Our Promise

Particle size determination by DLS

| Z-Average ± SD [nm] | RSD [%] | PDI ± SD | RSD [%] | Size distribution by Volume ± SD [nm] | RSD [%] | Size distribution by Number ± SD [nm] | RSD [%] |
|---------------------|---------|-------------------|---------|---------------------------------------|---------|---------------------------------------|---------|
| 12.2 ± 0.5 | 4.1 | 0.188 ± 0.022 | 11.7 | 11.7 ± 1.8 | 15.4 | 6.7 ± 0.2 | 3.0 |
| 11.6 ± 0.1 | 0.9 | 0.128 ± 0.006 | 4.7 | 9.2 ± 0.1 | 1.1 | 7.1 ± 0.2 | 2.8 |
| 12.4 ± 0.1 | 0.8 | 0.157 ± 0.017 | 10.8 | 9.3 ± 0.8 | 8.6 | 6.8 ± 0.2 | 2.9 |

▶ Challenge: Quantification mode and limits have to be defined by the working group

Di Francesco, T., Borchard, G., 2018. A robust and easily reproducible protocol for the determination of size and size distribution of iron sucrose using dynamic light scattering. J. Pharm. Biomed. Anal. 152, 89–93.

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Labile Iron

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Labile iron in view of EMA

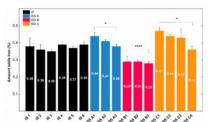
The quality attributes of nano-sized iron-based products that may have a major impact on efficacy and safety include:

• the stability of the iron-carbohydrate complex, this means: the fraction of labile iron released at the time of administration and the short term stability in plasma, as labile iron has well known direct toxic effects and may influence pharmacokinetics and body distribution

Reflection paper on the data requirements for intravenous iron-based nano-colloidal products developed with reference to an innovator medicinal product EMA/CHMP/SWP/620008/2012

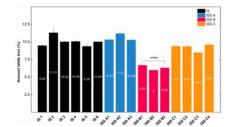
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Labile iron: Different results with different tests

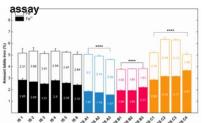


Fraction of labile iron determined for IS using the chromazurol B assay

DI Francesco, T., Philipp, E., Borchard, G., 2017. Iron sucrose: assessing the similarity between the originator drug and its intended copies. Ann. N. Y. Acad. Sci. 1407, 20



Fraction of labile iron determined for IS using the ferrozine assay



Fraction of labile iron determined for IS using the MAK025 iron assay

Labile iron: further challenges

- · Test kits only available from one supplier
- Supplier does not give information about composition of the test kit
- ▶ Mitigation: Development of a HPLC Method with Deferoxamine as chelator (in progress)

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Iron(II)

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Comparison of analytical methods for the determination of iron(II) in iron sucrose solutions

| Evaluation of | CE method | Cerimetry (CER) | Differential Pulse Polarography (DPP) | Cyclic Voltammetry on rotating disk electrode (CV) |
|------------------|---------------------------------------|---|--|---|
| Accuracy | 98 - 109% | 95.8 - 102.4% comparable to CV (10 lots) | quantification insufficient | Fe(II): 102.9 – 104.9 % Fe(III): 99.2 – 101.2 % |
| Precision | Fe(II): RSD 5.1% Fe(III): RSD 4.0% | Fe(II): RSD 1.9% | 0.3% m/V < 10% 0.15% m/V at 30% | Fe(II): RSD 3.6% Fe(III): RSD 1.7% Fe (total): RSD 1.8% |
| Investment costs | high | low | low | low |
| Miscellaneous | | | fingerprint half wave potential | Specific electrode needed |



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Iron (II) determination, comparison of results from different methods

| | Cerimetry | | Permanganometry | Cyclovoltammentry |
|--------------|----------------------|-------------------------------------|-----------------|-------------------|
| iron sucrose | Fe(II) % [m/V] | | Fe(II) % [m/V] | Fe(II) % [m/V] |
| 2% m/V Fe | | | | |
| n = 10 | 1st inflection point | 2 nd inflection point | | |
| minimum | 0.13 | 0.16 | 0.20 | 0.20 |
| maximum | 0.19 | 0.22 | 0.24 | 0.28 |
| mean | 0.16 | 0.20 | 0.22 | 0.22 |

▶ Challenge: Suitable method and limits have to be defined by the working group



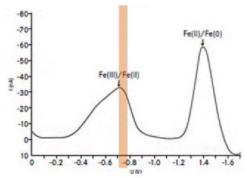
Reduction potential by polarography

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Reduction potential by Polarography



<code>red</code> bar mark the peak voltage ranges for the reduction potential Fe(III) \rightarrow Fe(II) by USP (iron sucrose injection solution – 0.750 \pm 0.050 V)

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Polarography against Zn standard

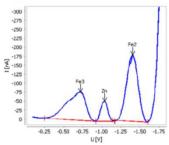
250n - 25

U (V)

797 VA Computrace

| | Potential vs. | Potential vs. | |
|--------------------------|-------------------|---------------|--|
| | Ag/AgCl reference | Zn peak | |
| Zn | -0.98 V | | |
| Fe(III) → Fe(II) | -0.66 V | +0.33 V | |
| Fe(II) → Fe ⁰ | -1.35 V | -0.37 V | |

Example determination with 884 Professional VA



884 Professional VA Professional VA

| | Potential vs. | Potential vs. |
|--------------------------|-------------------|---------------|
| | Ag/AgCl reference | Zn peak |
| Zn | -1.03 V | |
| Fe(III) → Fe(II) | -0.71 V | +0.32 V |
| Fe(II) → Fe ⁰ | -1.40 V | -0.37 V |
| | | |

▶ Problem solved by introduction of Zn standard

Metrohm Application Work VA CH4-0574-112018

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Conclusion

("There is light")

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Conclusion

What has been achieved?

Methods and limits could be implemented for the parameters:

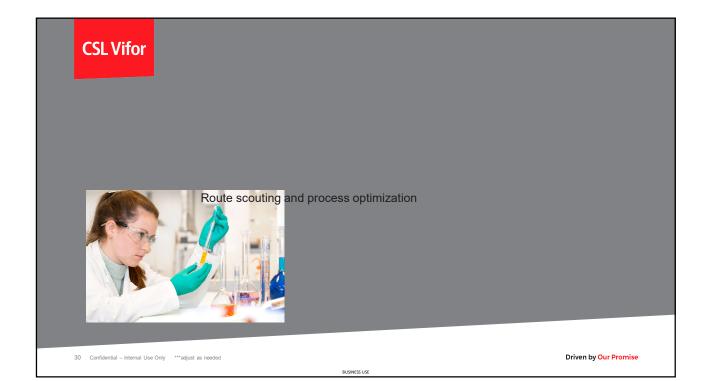
pH, alkalinity, chloride, turbidity point (pH), reduction potential (polarography), assay

Where do we still face challenges?

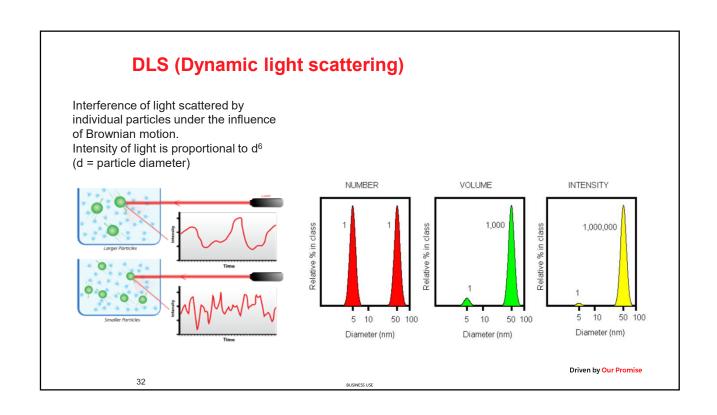
Methods for some parameters need to be further developped and limits to be set:

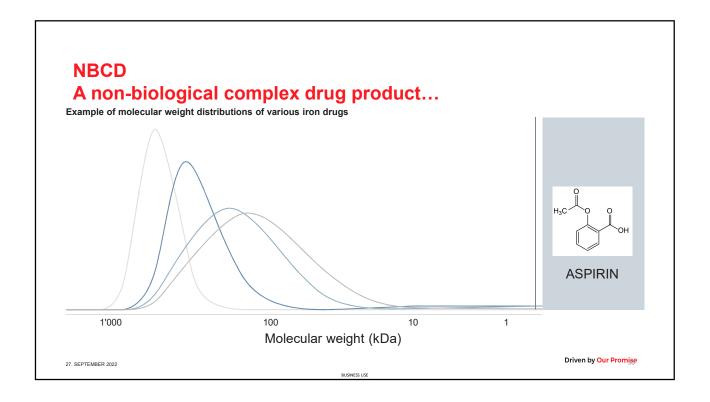
Labile iron (HPLC), iron(II), particle size (DLS), Molecular mass distribution (SEC)











Expectations and complexity in setting standards for polymeric excipients

Consideration of solvents and monomers

September 20, 2022, Johanna Eisele





Disclaimer



This is my personal knowledge and experience. It is not necessarily the opinion of my employer.

This presentation can only provide a small impression on the complexity of polymeric excipients, and no in-depth information is shared.

2 | 20 SEP 2022 | Expectations and complexity in setting standard for polymeric excipients



Setting specifications on solvents and monomers in polymeric excipients

- 1 Polymeric excipients are complex and diverse
- 2 Analytics of polymers
- 3 Setting specifications for residual solvents in polymeric excipients
- 4 Case study 1: solvents in copolymer from emulsion polymerization process
- 5 Case study 2: solvents in copolymer from solution polymerization process
- 6 Case study 3: monomers in Poly(D,L-lactide-co-glycolide)
- Conclusion and summary

3 | 20 SEP 2022 | Expectations and complexity in setting standard for polymeric excipients



Types of polymeric excipients described in Ph. Eur.

- Approximately one hundred (100) Ph. Eur. monographs include a section "FUNCTIONALITY-RELATED CHARACTERISTICS", many of them (co)polymers
 - Synthetic polymers, semisynthetic polymers, sugars, natural proteins, ...
- Homopolymers: Poly(vinyl) Alcohol, Povidone, Poly(vinyl acetate), Dextrose, PEGs, ...
- Copolymers: Acrylate Copolymers, PEGylated fatty acids, Polysorbates, Copovidone
- Round about 15-20 monographs for cellulose varieties: semisynthetic polymers
- Not yet listed in Ph. Eur.: Poly(lactide-co-glycolide)



Polymeric excipients are complex and diverse

- Chemically very different materials
- High or low molecular weight
- Different polydispersity (=different chain length distribution)
- Linear, branched or cross-linked
- Available as powders, granules, clear solutions, polymer latices, ...
- Different polymerization processes: emulsion polymerization, solution polymerization, ring-opening polymerization...for synthetic polymers
- Different preparation processes... for plant derived natural polymers
- Different manufacturing scales: kilograms to tons

5 | 20 SEP 2022 | Expectations and complexity in setting standard for polymeric excipients



Chromatography of polymers is complex

- Challenges in chromatographic techniques:
 - Polymers may interact with column materials
 - Polymers may interact with eluent
 - Interaction may vary with molar mass of the polymer in question
- It takes considerable resources time and knowledge to develop robust methods.
- Controls and standards must be chosen carefully.



Even with a good description in a monograph, analytical experts must carefully implement and verify the respective methods on their equipment.

6 | 20 SEP 2022 | Expectations and complexity in setting standard for polymeric excipients



ICH Q3C - Setting residual solvents specifications for polymers

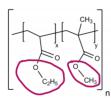
- ICH Q3C / Residual solvents are limited according to the principles defined in chapter 5.4, using general method 2.4.24 or another suitable method. This is the basis and starting point:
- Likely to be present (LTBP): Those solvents that are
 - 1) used or produced in the final manufacturing step;
 - 2) used or produced in earlier manufacturing steps but they are not consistently removed by a validated process;
- Supplier of excipients must provide statements / information on residual solvents.
- Sources of residual solvents in polymeric excipients:
 - Solvents are used in the manufacturing process (i.e., in solution polymerization processes, purification)
 - Solvents may be introduced via raw materials containing such solvents
 - Solvents result from degradation during storage (i.e., side chains of polymer may hydrolyze and split of alcohols)

7 | 20 SEP 2022 | Expectations and complexity in setting standard for polymeric excipients



Case study 1: solvents in copolymer from emulsion polymerization process

- Today eight monographs of methacrylic acid / methacrylate copolymers in Ph.Eur.
- Case Study 1: METHACRYLIC ACID ETHYL ACRYLATE COPOLYMER (1:1) DISPERSION 30 PER CENT.
 - Tablet coating
 - Also described in monographs in USP-NF, JPE and ChP
 - Manufactured by emulsion polymerization. Solvent: water
 - Side chains may hydrolyze after longer storage or at elevated temperatures
 - Ethanol and methanol may form
- During risk assessment all raw materials were evaluated, and the process analyzed.
- Possible sources of residual solvents were analyzed.
- A representative lot was tested for Class 1 and 2 Solvents.
 - Only source identified was degradation: limits for ethanol and methanol were set a < 0.5% and < 0.1%, respectively
 - Screening of residual solvents was performed according to USP <467> (water-insoluble articles)
 - Quantification of methanol and ethanol was performed using an in-house GC-method





Case study 2: solvents in copolymer from solution polymerization process

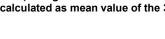
Case Study 2: AMMONIO METHACRYLATE COPOLYMER.

- Tablet coating
- Also described in monographs in USP-NF and JPE
- Manufactured by solution polymerization and subsequent extrusion (purification step)
- Main solvent ethanol, small amounts of methanol
- During risk assessment all raw materials were evaluated, and the process analyzed.
- Possible sources of residual solvents were analyzed: solvents, degradation.
- A representative lot was tested for Class 1 and 2 solvents.
- Sources of solvents:
 - Solvents from manufacturing process: limits for ethanol and methanol were set according to Table 2 and Table 3 of 5.4. RESIDUAL SOLVENTS.
 - Screening of residual solvents was performed according to USP <467> (water-insoluble articles)
 - Quantification of methanol and ethanol was performed using an in-house GC-method
- | 20 SEP 2022 | Expectations and complexity in setting standard for polymeric excipients



Case study 3: monomers in Poly(D,L-lactide-co-glycolide)

- Case study 3: Poly(D,L-lactide-co-glycolide)
 - Parenteral use, depot formulations
- ChP monograph available, NF draft monograph published
- Wide range of polymer composition / ratio of D,L-lactide to glycolide: 100:0 to 50:50 molar ratio
- Manufactured by ring-opening polymerization.
- Monomers are not toxic.
- Presence of monomers impacts degradation both during storage and in vivo. This can be a desired property.
- ≤ 0.5 % D,L-lactide ≤ 0.5 % glycolide were set as specifications.
- The residual monomer content is determined by gas chromatography (GC, FI-detector) using an internal standard. The sample is dissolved in methylene chloride. The residual monomer content is calculated as mean value of the 3 injections.





GM 2034: Paragraph on related substances does not apply to excipients

- This is explicitly mentioned in 5.10. CONTROL OF IMPURITIES IN SUBSTANCES FOR PHARMACEUTICAL USE
- IPEC recommends to excipient manufacturers to establish a composition profile
- The IPEC Federation Composition Guide For Pharmaceutical Excipients provides an approach
- For excipients where purity can be measured directly, any undesirable organic and inorganic components present at or above 0.1% should be identified and assessed to determine the need (if any) for quantitative limits
- Composition profiles may be considered proprietary information





Communication of excipient composition is a case-to-case decision. Often a CDA needs to be concluded.

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By-products and components to be expected in synthetic polymers

- Many synthetic polymers are manufactured by exothermal polymerization processes. The raw materials may include monomers, chain modifying agents and initiators, solvents.
- Residual monomers and residuals solvents are the key impurities to control in synthetic polymers and are usually identified and specified.
- Monomers and initiators may also contain minute amounts of stabilizers to prevent uncontrolled polymerization / degradation. These stabilizers are necessary for both quality purposes (better control of the process) and work safety (to prevent uncontrolled exothermal reactions).
- By-products may be present as a result of raw materials and exothermal manufacturing processes.
 These traces would not require further action unless exceptionally toxic



Suppliers of polymeric excipients will usually evaluate such by-products and document them in a composition profile.



Polymeric excipients are complex and diverse

- Many different types of polymers are available that can be used as excipients in drug products.
- Analytics are complex as polymers are challenging matrices.
- Get a thorough knowledge on the behavior of a polymer in each analysis system.
- It takes considerable time and effort to develop a robust and reliable method.
- Setting the specification must consider both safety and production capability.
- Lowest limits are not necessarily the best ones.
- Monographs should only limit key impurities such as monomers and residual solvents, and those by-products / components > 0.1%



Drug product manufacturers must get familiar with the polymers they want to use in their drug product.

Polymeric excipient suppliers will help in most cases!

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Thank you!



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