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	Table 5.1.61 – Tasks to be undertaken durir Activity	ng the validation process normally carrier	d out by
		Supplior	Lisor
	Primary validation	Juppilei	_1
	LIRS (instrument application)	-	+
	Description of the technique	+	_2
	Risk benefit analysis	_3	· · /
	Design Qualification		+
	Installation Qualification	_4	+
	Operational Qualification	_4	+
	Performance Qualification:		
	- Verification of primary performance qualification	-	+
	 Verification for the intended use (e.g. sterility testing, TAMC/TYMC 		+ I S
	Method Suitability Test	-	+
(1)	The user performs primary validation if they employ the alt defined by the suppli	ernative method for an us	e other than that
	(2) The user shall critically review information (3) As part of commercialisation, the supplier may list adv conventional techniqu	provided by the supplier. antages of the alternative es.	method over
	(4) 10 / 00 for complex equipment 10/00 is of	ten outsourced to supplie	r.

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Alternate Methods



USP General Notices 6.30:

"Alternate methods may be used if they provide advantages in terms of accuracy, sensitivity, precision, selectivity, or adaptability to automation or computerized data reduction or in other special circumstances. Such alternate methods shall be validatedand must be shown to give equivalent or better results...."



Factors to Consider

These factors include the following

- Identification of suitable alternative assay methodologies
- Development of user specifications for equipment selection
- Demonstration of the applicability of the method as a replacement for a standard compendial method
- Installation and operational qualification of the equipment
- Laboratory performance qualification of the method
- Re-alignment for decision making to release product

Microbiology is a Logarithmic Science

Microbiology is a logarithmic science. While we can distinguish between 100 and 1000 cfu (a difference of $1 \log_{10}$), it may be not possible to discern smaller differences (less than $0.3-0.5 \log_{10}$). The inherent variability of these methods is substantially greater than analytical chemistry methods. This inherent analytical variability must always be considered in the selection, development, and validation of alternative methods. The expectation of a degree of agreement between alternate microbiological methods and traditional growthbased methods beyond what is technically feasible could complicate the implementation of newer analytical technologies regardless of their specific mode of analysis

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Limitations of the CFU The appearance of a visible colony requires significant growth of the initial cells plated - at the time of counting the colonies it is not possible to determine if the colony arose from one cell or 1,000 cells. Therefore, the results are given as CFU/mL (colony-forming units per milliliter) for liquids, and CFU/g (colony-forming units per gram) for solids to reflect this uncertainty (rather than cells/mL or cells/g).







New USP<1223> refers to Non- inferiority

• "To demonstrate the acceptability of the alternate procedure relative to the current microbiological procedure, the laboratory must demonstrate that the new procedure is as good as or better than the current procedure in terms of the ability to detect presence of microorganisms."

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"In general, a recommended approach for comparing the alternate procedure to the compendial procedure is to use a **non-inferiority test** (one-sided, as in non-inferiority tests conducted in clinical trials for the evaluation of new drug products rather than two-sided equivalence (as in bioequivalence)."



Non-inferiority Clinical Trials



A non-inferiority trial is a comparison with an active control (existing treatment) to determine whether the difference in response between a new drug and the active control is small enough (less than some prespecified margin) to demonstrate that the new treatment is not less effective (or is slightly less effective) than the control in achieving the primary clinical outcome.

Determining Equivalence

- First step is define the limits of equivalence (± δ) for the alternative method.
- Calculate the 95% confidence intervals for the difference between the control, i.e. compendial and alternative test method.
- If the confidence interval is entirely within ± δ then equivalence is established.



OptionDemonstrationComparison to Official Compendial MethodBased on Numerical Results or ConclusionNumber of Characteristi csAcceptable proceduresAcceptableNoResultsMultiplePerformance equivalentEquivalentYesResultsMultipleResults equivalentEquivalentYesResultsSingleDecisionEquivalentYesConclusionsSingle	Equivalence Options				
OptionDemonstrationComparison to Offficial Compendial MethodBased on Numerical Results or ConclusionNumber of Characteristi csAcceptable proceduresAcceptableNoResultsMultiplePerformance equivalentEquivalentYesResultsMultipleResults equivalentEquivalentYesResultsSingleDecisionEquivalentYesConclusionsSingle					
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Decision Equivalent Yes Conclusions Single	Results equivalent	Equivalent	Yes	Results	Single
equivalent	Decision equivalent	Equivalent	Yes	Conclusions	Single

Method Suitability



After an alternative method has been shown to be equivalent to the compendial test with one product, it is not necessary to repeat the equivalency parameters for every new product; it is merely necessary to verify the method suitability for each additional product.



Issues on hand...



- The currently required 14-day incubation period for the compendial sterility tests imposes a significant burden on the manufacturer, who must quarantine product until successful completion of the test.
- The long incubation time (14 days) is unsuitable for numerous small lot size products including cytotherapy, radiopharmaceuticals, pharmacy compounded sterile products, and some clinical trial materials.



Expert Panel Approach

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- A two-phased approach was decided upon with the user requirement specifications for the different stakeholders established first.
- Based on these user requirements, the most appropriate technologies for a compendial rapid sterility test(s) would be recommended to the USP General Chapters-Microbiology Expert Committee.

Critical User Requirement Specifications

The most critical user requirements for candidate rapid sterility tests were

- Specificity (i.e. the ability to detect a wide range of species)
- Limit of detection (i.e. the ability to detect a low number of microorganisms)
- Time to result
- Improved patient safety
- Sample preparation
- Sample quantity (i.e. minimum number of articles tested and quantity per container tested).

Ability to detect a wide range of microorganisms



- Although all the analytical platforms should have the ability to detect a wide range of bacteria, yeast and mold, it is equally important to demonstrate that a rapid sterility test technology chosen is capable of detecting microorganisms implicated in sterility test failures, infection outbreaks and product recalls associated with either compounded sterile preparations, radiopharmaceuticals, cell therapies or manufactured pharmaceuticals.
- This is especially true if the technology, after risk analysis, is shown to improve patient safety with the administration of the products unique to that stakeholder group.



























































Name	Target	Principles of measurement	Examples of measurement device
1) Direct Method	•		
Solid phase cytometry	Microorganism	Directly detect the signals from the bacteria trapped onto a filter. The signals on their physiological activities can be obtained by choosing suitable dyes. Autofluores- cence may also be used. To selectively detect specific bacteria, gene probe, antibody or fluorescent-labeled phage may be utilized. Various optical devices including a fluorescent microscope and laser microscope are used as detection/measurement apparatus.	Fluorescence microscope Laser scanning cytomete etc.
Flow cytometry	Microorganism	Directly detect the signals given by the bacteria passing through fluid or air. The signals on their physiological activities can be obtained by choosing suitable dyes. Au- tofluorescence may also be used. To selectively detect specific bacteria, gene probe, antibody or fluorescent- labeled phage may be utilized. Various optical devices are used as detection/measurement apparatus.	Flow cytometer, etc.

1. Detection targets and principles			
Name	Target	Principles of measurement	Examples of measurement device
2) Indirect Method			
Immunological methods	Antigen	React the antigen of bacteria with the specific antibody, and detect the color or fluorescence visually or by a microplate reader. Immunochromatography is a simple and easy method for the purpose.	Immunochromatography, Micro plate reader, etc.
Nucleic acid am- plification	Nucleic acid	Amplify a nucleic acid of microorganism by using the primers specific to the target microorganism, and analyze the amplified nucleic acid fragments. Quantitative deter- mination is possible by performing of quantitative PCR.	Electrophoresis appa- ratus, Quantitative PCR
Bioluminescence/ fluorescence	ATP, etc.	Measure ATP which is released from microorganisms on the basis of luminous or fluorescence phenomena oc- curred by enzyme reaction.	luminescence detector, fluorescence detector, etc
Micro colony method	Growth (Micro colony)	Detect and count the micro colony that appears in early stage of colonization. The same culture conditions (medium composition, temperature, etc.) as the plate culture method can be used.	Fluorescence microscopy etc.
Impedance method	Growth (Elec- trical character- istic)	Utilize the change in electrical properties of medium due to the metabolites produced by the growth of microor-ganisms.	Electrodes

1. Detection targets and principles				
Name	Target	Principles of measurement	Examples of measurement device	
2) Indirect Method				
Gas measuring method	Growth (Gas production, etc.)	Utilize the change in amount of gases caused by CO_2 production, O_2 consumption, etc. with the growth of microorganisms.	Gas measuring instrument Color change of medium	
Fatty acid profiles	Fatty acid	Utilize the fatty acid profile of cell components that differs depending on the taxonomic groups of microor-ganism.	Gas chromatography	
Infrared spectros- copy	Cell component	Utilize the pattern of infrared spectrum obtained by in- frared light irradiation to whole microorganism.	Fourier transformation in- frared spectroscope	
Mass spectrometry	Cell component	Measure the cell component by means of a mass spec- trometer, and identify it by database.	Mass spectrometry	
Genetic finger- printing method	DNA	Utilize the electrophoresis pattern of DNA fragments ob- tained by cleaving the DNA extracted from sample with a restriction enzyme. It can be identified by database. Analysis of community structure is possible by T-RFLP.	Electrophoresis apparatus	
High throughput sequencing	Nucleic acid	Determine the sequence of nucleic acids extracted from bacteria exist in sample, and analyze the community structure phylogenetically.	Sequencer, etc.	

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1. Detection targets and principles	
Detection of a bacterial cell by gene sequence-based method	
target	indicator
Conventional cultivation-based method	
Determine the number of bacterial cells as colony formation.	colony
Nucleic acid amplification	
Extract chromosomal DNA harboring 16S rRNA gene*, and analyz the amplified nucleic acid fragments.	amplicon
High throughput sequencing	
Determine the sequence of nucleic acids extracted from bacteria e in sample, and analyze the community structure phylogenetically.	exist population structure
* 1 to 15 copies per cell	
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3. Applications and particular considerations

Because the new methods are rapid, product testing, environmental monitoring, bioburden evaluation, raw materials control, etc. can be performed in real-time, and this is highly advantageous for process control, allowing alert levels, action levels and so on to be set up based on trend analysis of the obtained data.

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