



中国药科大学
CHINA PHARMACEUTICAL UNIVERSITY

Regulation of Pharmaceutical Excipients in China

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Content/目录

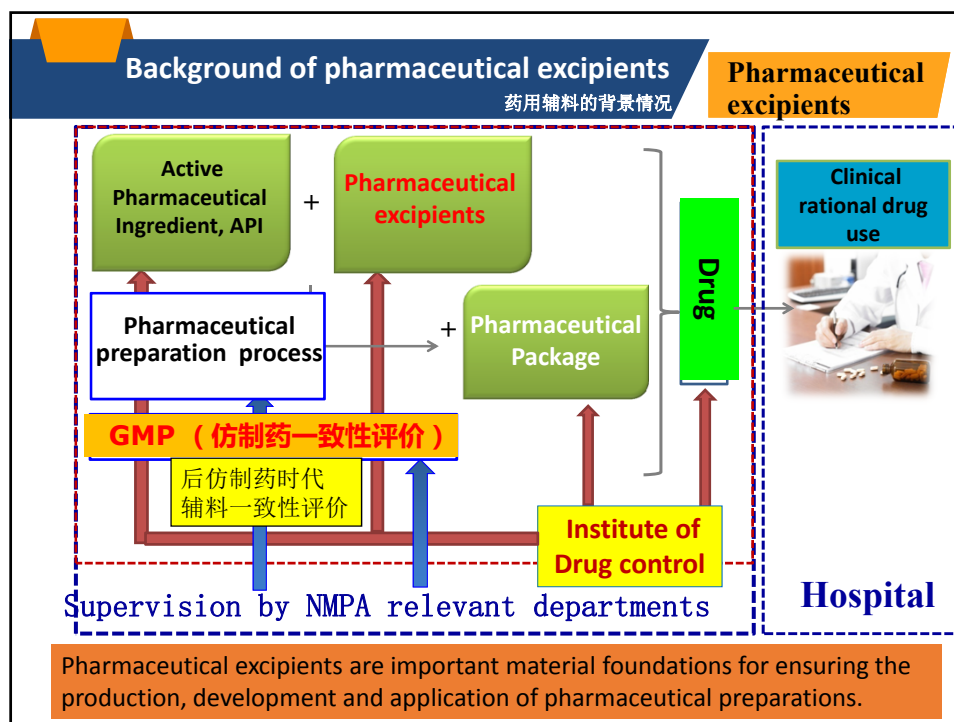
- 01 Introduction
- 02 Regulation of pharmaceutical excipients in China
- 03 Summary

Drug Product=API+excipients+packaging materials

In China, qualified pharmaceutical excipients are important for dosage form performance and safety.

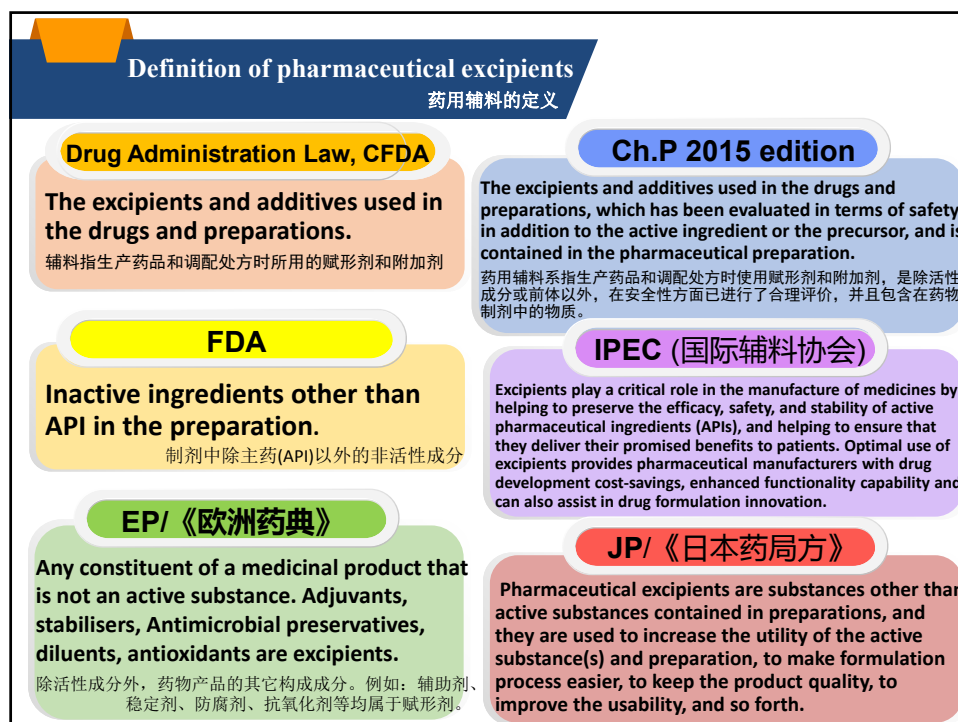
In China, 546 excipients have pharmaceutical use experience. But only 270 monographs were published in CHP 2015. That means many used excipients may not guarantee the dosage form performance and safety.





In 2016, CFDA published new regulation of pharmaceutical excipients based on China DMF filing, and final product associated approval system. The new regulation replaced the excipient itself registration system. The new system will accelerate the use of GMP– manufactured excipients in both NDA and ANDA, also in quality and therapeutical effects identical evaluation researches.



Regulation on API, Pharmaceutical excipients (PEs), and Pharmaceutical packaging materials (PPMs) changed:

1. From separately registration to CDMF and review/approval with final product (FP).
2. FP producer become the 1st duty charger of choosing, auditing and approval of API, PEs, PPMs.

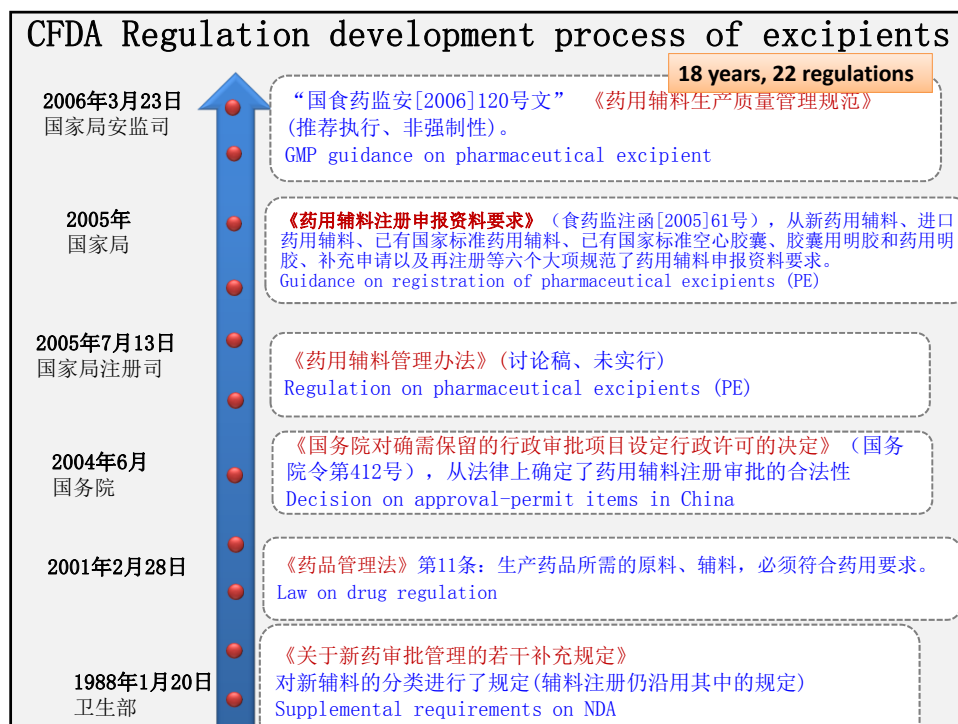


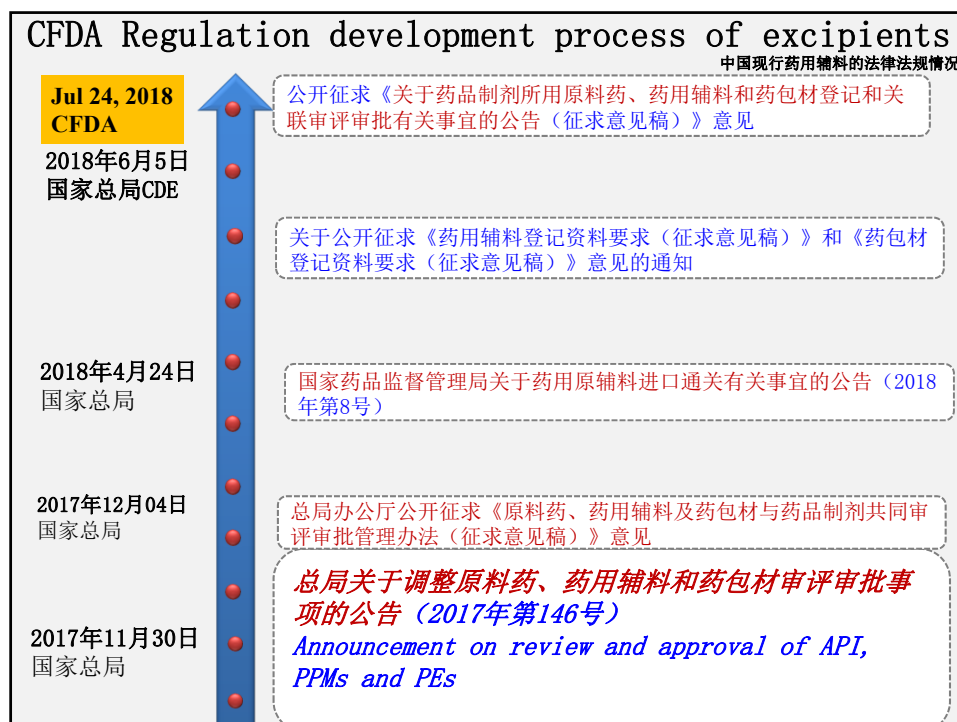
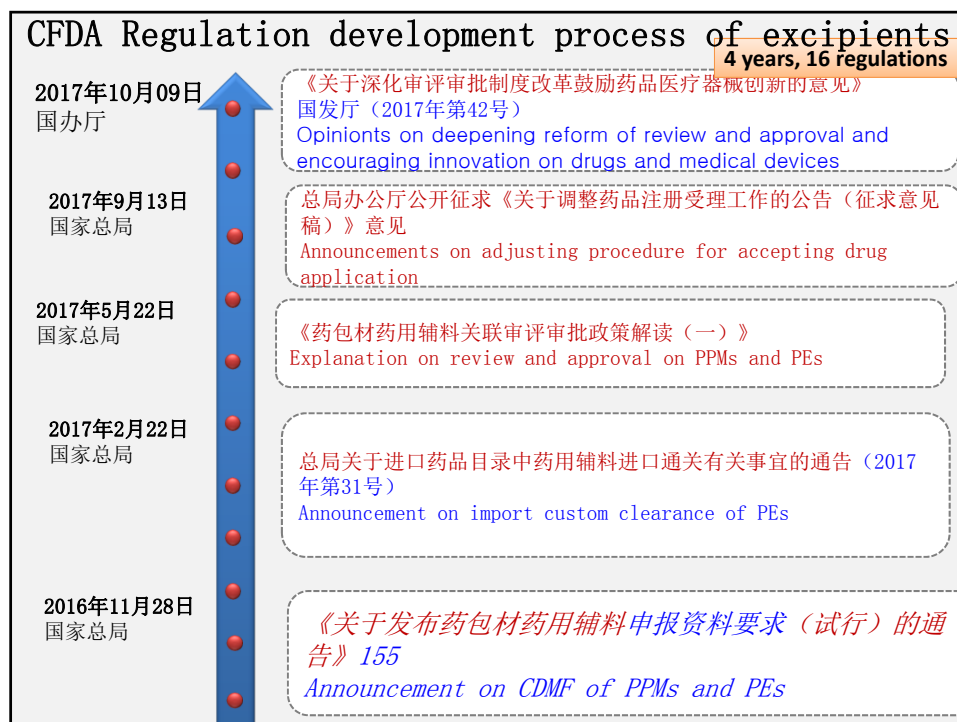
Comparison of Pharmaceutical Excipients Review & Approval System in China and ICH Excipient Regulatory Systems					
	USA	EU	Japan	China	
Pharmaceutical excipient regulatory system	DMF	CEP certification	Provide dossiers with preparations	MF	CDMF
Review & Approval	Dependent, review & approval with preparations	Independent (EDQM)	Dependent, review & approval with preparations, Pharmaceutical excipient unapproved	Dependent, review & approval with preparations, Pharmaceutical excipient unapproved	Dependent, associated review & approval with preparations, registration number
Range	Critical excipient	Excipients collected in EP, COS certification	Excipients not collected in EP	New excipients, generic drug and coprocessed excipient	Excipients used in drug products.
<div>  <div>Type II DMF</div> </div> <div>  <div>EDMF&COS: EDMF applies to all APIs. COS certification can handle substances collected in EP, including APIs and pharmaceutical excipients.</div> </div> <div>  <div>Only after the MF registration information is replaced with a formal registration number, the review of drug marketed applications will start.</div> </div> <div>  </div>					

02

Regulation of pharmaceutical excipients

药用辅料的管理要求





China Food and Drug Administration Aug. 18, 2015
CFDA Released the Opinions on the Reform of Review & Approval System for
Drugs and Medical Devices ([2015] No.44)



Technical requirements
are the same as before.

Separate-Review
and approval
systems
单独审评审批

PF ASSOCIATED Re
view and
approval systems
关联审评

(14) Simplify the drug approval process and improve the drug re-registration system. Implement the associated review and approval of the pharmaceuticals with the pharmaceutical packaging materials and excipients. The separate approval of pharmaceutical packaging materials and excipients shall be changed to the review and approval with drugs.

简化药品审批程序，完善药品再注册制度。实行药品与药用包装材料、药用辅料关联审批，将药用包装材料、药用辅料单独审批改为在审批药品注册申请时一并审评审批。

China Food and Drug Administration Aug. 10, 2016
CFDA Released the Announcement on Associated Review and Approval of Pharmaceutical
Packaging Materials and Pharmaceutical Excipients with Drugs ([2016] No.134)



To implement the policies set forth in the Opinions on the Reform of Review and Approval System for Drugs and Medical Devices ([2016] No.44), the separate review & approval for pharmaceutical excipients has been replaced by associated review & approval with drugs in the application for registration of drugs.

China Food and Drug Administration Oct. 8, 2017
The General Office of the CPC Central Committee and the General Office of the State Council Printed and Issued the Opinions on Deepening the Reform of Review and Approval System and Encouraging the Innovation of Drugs and Medical Devices ([2017] No.42)



Joint-review
关联审评审批

Review and Approval together
开始共同审评

(12) Implement the review and approval of the pharmaceuticals with the pharmaceutical raw materials and excipients and packaging materials.

实行药品与药用原辅料和包装材料关联审批。原料药、药用辅料和包装材料在审批药品注册申请时一并审评审批，不再发放原料药批准文号，经关联审评审批的原料药、药用辅料和包装材料及其质量标准在**指定平台公示**，供相关企业选择。药品上市许可持有人对生产制剂所选用的原料药、药用辅料和包装材料的质量负责。

China Food and Drug Administration Nov. 30, 2017
CFDA Released the Announcement on Adjusting the Review & Approval Items of APIs, Pharmaceutical Excipients and Pharmaceutical Packaging Materials ([2017] No.146)



总局关于调整原料药、药用辅料和药包材审评审批事项的公告（2017年第146号）

Announcement on Adjusting the Review & Approval Items of APIs, Pharmaceutical Excipients and Pharmaceutical Packaging Materials ([2017] No.146)

- 一、药品注册申请人在中华人民共和国境内提出的注册分类 2.2、2.3、2.4、3、4、5 类**药品制剂**注册申请所使用的药用辅料适用于本公告要求。
- 二、**自本公告发布之日起**，各级食品药品监督管理部门**不再单独受理**药用辅料注册申请，国家食品药品监督管理总局药品审评中心（以下简称药审中心）建立药用辅料登记平台（以下简称登记平台）与数据库，有关企业或者单位可通过登记平台按本公告要求提交药用辅料登记资料，获得药用辅料登记号，待关联药品制剂提出注册申请后一并审评。
- 四、药用辅料登记资料主要内容：企业基本信息、辅料基本信息、生产信息、特性鉴定、质量控制、批检验报告、稳定性研究、药理毒理研究等。具体内容应当符合《关于发布药包材药用辅料申报资料要求（试行）的通告》（国家食品药品监督管理总局通告2016年第155号）中药用辅料申报资料要求。
- 六、在登记平台建立的过渡期，药审中心在门户网站（网址：www.cde.org.cn）以表格方式对社会公示“药用辅料登记数据”，公示的信息主要包括：登记号、品种名称、企业名称、企业注册地址、国产/进口、包装规格、登记日期、更新日期、关联药品制剂审批情况等。
- 药用辅料企业在药审中心门户网站“申请人之窗”填写品种基本信息后，将登记资料（含登记表，见附件1）以**光盘形式**提交至药审中心（邮寄地址：北京市海淀区复兴路甲1号药品审评中心业务管理处），**药审中心在收到资料后5个工作日内，对登记资料进行完整性审查**。资料不齐全的，一次性告知所需补充的登记资料；资料符合要求的，由药审中心进行公示。
- 七、对已受理未完成审评审批的药用辅料注册申请，由**药审中心生成药用辅料登记号**，并将申报信息导入上述登记数据表后对社会公示。申请人应按本公告要求将申报登记资料以**光盘形式**提交至药审中心。新申报的药品制剂（含变更药用辅料的补充申请）中使用已有批准文号的药用辅料，**该药用辅料也应按要求进行登记**。

The separate review & approval for pharmaceutical excipients and pharmaceutical packaging materials has been canceled. The review & approval of APIs, pharmaceutical excipients and pharmaceutical packaging materials shall be dealt with together in the application for registration of drug preparations.

一、国家食品药品监督管理总局（以下简称总局）负责全国范围内药用辅料生产企业的日常监督管理。药用制剂申请审评审批过程中，国家食品药品监督管理总局根据相关要求对涉及的药用辅料进行**抽查和检验**。

附件1：原料药、药用辅料和药包材登记表
附件2：原料药、药用辅料和药包材企业授权使用书

China Food and Drug Administration Jul. 24, 2018
CFDA Released the Opinions on the Announcement of Registration and Review & Approval Items of APIs, Pharmaceutical Excipients and Pharmaceutical Packaging Materials



Opinions on the Announcement of Registration and Review & Approval Items of APIs, Pharmaceutical Excipients and Pharmaceutical Packaging Materials

- 一、具有以下情形之一的药用辅料和药包材企业可自主选择是否按照146号公告要求进行登记。
 - (一) 已纳入中国药典、美国药典、欧洲药典、日本药典和英国药典的非高风险药用辅料以及已有国家标准的非高风险药包材。
 - (二) 在食品中有使用历史且具有食品安全国家标准的药用辅料，用于口服制剂时。
 - (三) 在化妆品中有使用历史且具有化妆品国际或行业标准的辅料，用于外用制剂（眼用制剂、粘膜给药制剂和直接接触伤口的制剂除外）时。
 - (四) 可证明在食品包装中使用过的与食品直接接觸的藥包材，仅用于口服固体制剂时。
 - (五) 部分矫味剂、香精、色素、pH调节剂等药用辅料（详见附件）。

To implement the policies set forth in the Opinions on Deepening the Review and Approval System Reform and Encouraging the Drug and Medical Device Innovation (CPC & SC [2017] No.42) and further improve the associated review and approval of pharmaceutical excipients and packaging materials with drugs.

- (五) 制剂企业应保证其所生产所用的原料药、药用辅料和药包材的原批准证明文件有效或取得登记号。
- 五、制剂变更原料药、药用辅料和药包材，可选用已有登记号的产品，并按有关技术指导原则和标准就变更对制剂的影响进行评估，及时按相关要求向药审中心进行备案或提出补充申请。
- 六、药审中心完成原料药、药用辅料和药包材技术审评后，形成的技术审评意见统一通过药审中心网站申请人之窗反馈原料药、药用辅料和药包材登记人。
- 七、境外原料药、药用辅料和药包材厂商可由驻我国代表机构按146号公告要求对持有的原料药、药用辅料和药包材进行登记，要求登记资料应当为中文资料，也可委托1家中国境内的法人机构作为全权代理人进行登记，并代为履行登记人相关义务，境外厂商作为登记人对登记资料的真实性负责。
- 八、原料药、药包材、药用辅料登记人应对其产品质量负责，并在满足相应生产质量管理要求的条件下组织生产；积极配合药品生产企业开展供应商审计。

China Food and Drug Administration Jul. 24, 2018
CFDA Released the Opinions on the Announcement of Registration and Review & Approval Items of APIs, Pharmaceutical Excipients and Pharmaceutical Packaging Materials

药品制剂所用的部分矫味剂、香精、色素、pH调节剂等药用辅料可不按照146号公告要求进行登记，具体如下：

1. 矫味剂（甜味剂）：如蔗糖、单糖浆、甘露醇、山梨醇、糖精钠、阿司帕坦、三氯蔗糖、甜菊糖苷、葡萄糖、木糖醇、麦芽糖醇等。该类品种仅限于在制剂中作为矫味剂（甜味剂）使用。
2. 香精、香料：如桔子香精、香蕉香精、香兰素等。执行食品标准的，应符合现行版GB 2760《食品安全国家标准 食品添加剂使用标准》、GB 30616《食品安全国家标准 食品用香精》及GB 29938《食品安全国家标准 食品用香料通则》等相关要求。
3. 色素（着色剂）：如氧化铁、植物炭黑、胭脂虫红等。执行食品标准的，应符合现行版GB 2760《食品安全国家标准 食品添加剂使用标准》等相关要求。
4. pH调节剂（包括注射剂中使用的pH调节剂）：如苯甲酸、富马酸、醋酸、醋酸钠、枸橼酸（钠、钾盐）、酒石酸

In the table, some sweetening agent, flavors, colorant, pH adjusters and other pharmaceutical excipients used in preparations may not be registered according to the requirements of Announcement No. 146.

上述药用辅料，现行版《中国药典》已收载的，应符合现行版《中国药典》要求；现行版《中国药典》未收载的，应符合国家食品标准或现行版美国药典/国家处方集、欧洲药典、日本药典、英国药典标准要求；其他辅料，应符合药用要求。

SUMMARY

1. The New Regulation of PEs is CDMF and FP review/approval system, significantly changed from approving separately system.
2. The change does not means loosen regulation. Only duty changed to FP producer. The NMPA will have more resources to on-site inspection and so on.
3. NO filing, no use.
4. Once filing, review and approval will based on FP-associated process.
5. LOA needed for the user to drug application.
6. On-site inspection is a important step to make sure the PPM and PE manufactured under GMP, and guarantee the data integration.

