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





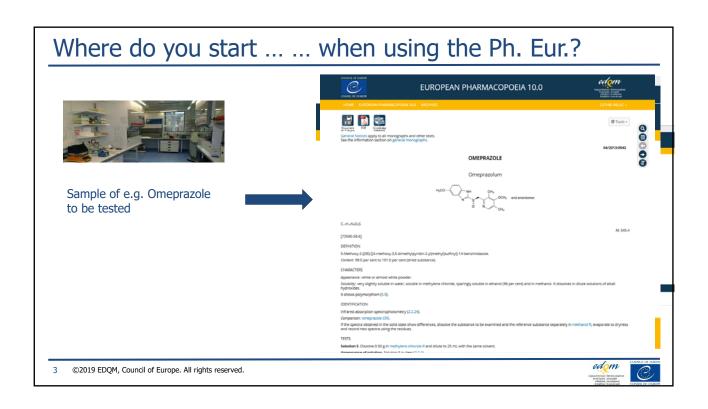
### General concepts in the Ph. Eur.: theory and rationale

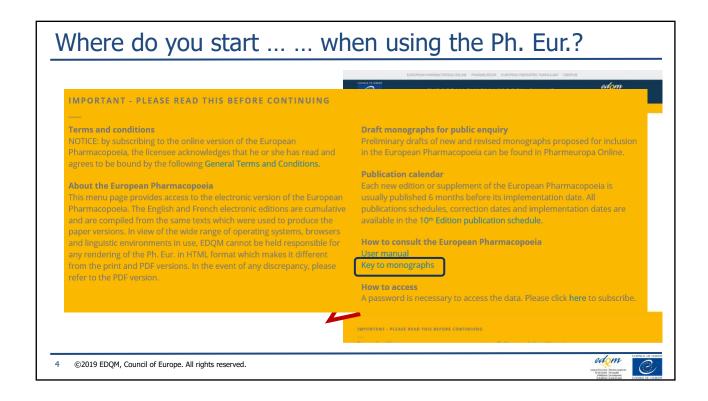
2019 Training Session
"The European Pharmacopoeia"
Mrs Cathie Vielle
EDQM, Head of European Pharmacopoeia Department

10 – 11 September 2019, Iselin, New Jersey, USA

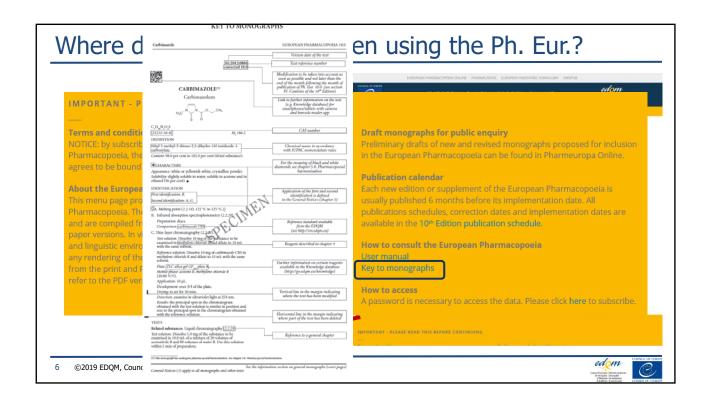




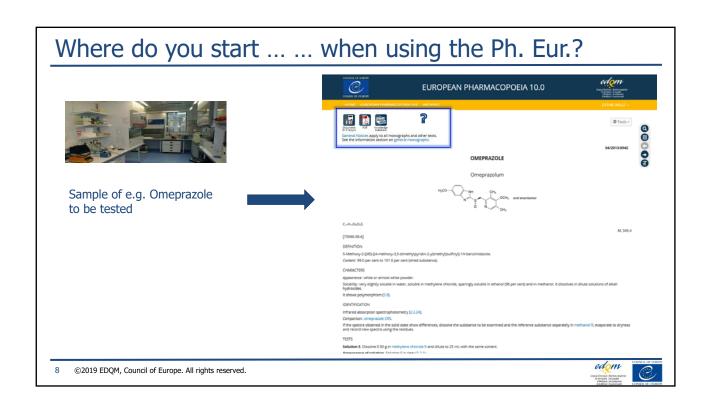


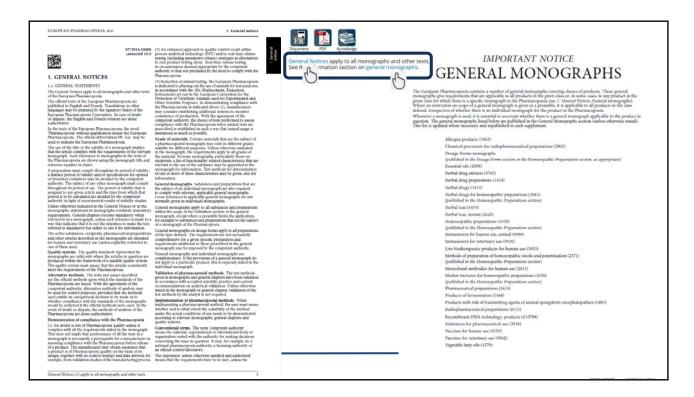


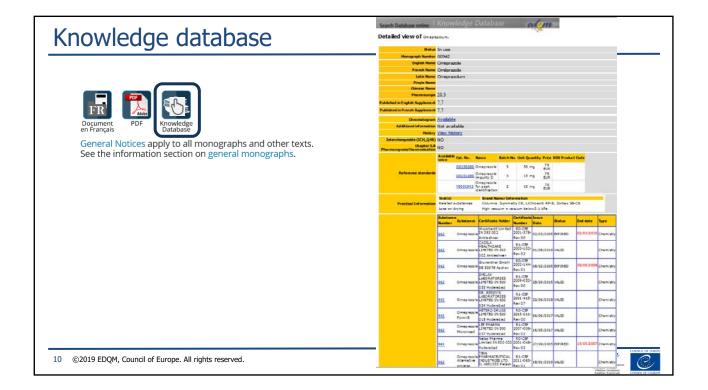


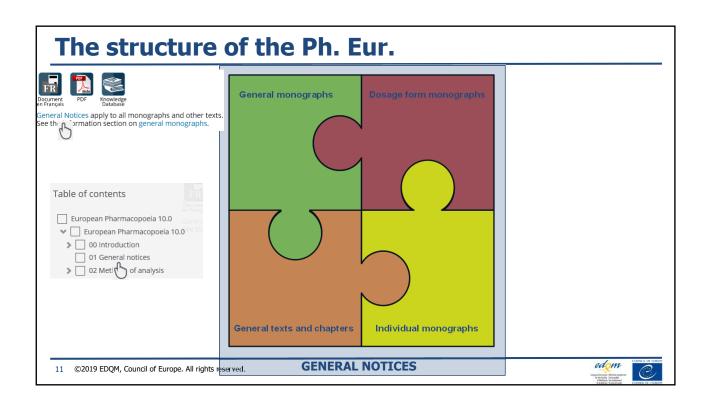


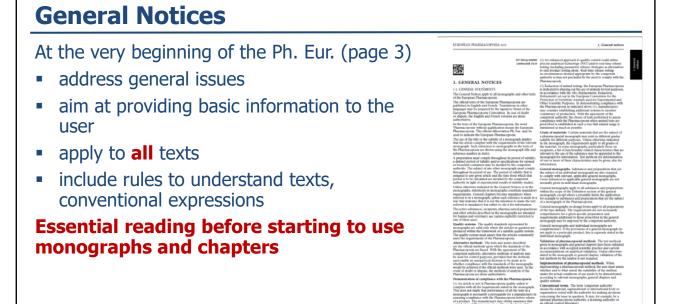












#### **General Notices – answer to a lot of questions!**

- Such as:
  - What about alternative methods?
  - What about waiving of tests?
  - What does compliance mean?
  - What is mandatory?
  - What to do when implementing a method?
  - Why two identification tests ... sometimes?
  - Human and/or veterinary use?

And many more

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#### **Conventional terms: meanings**

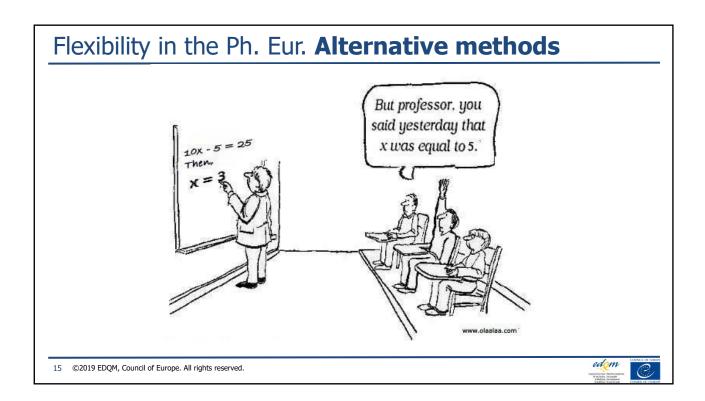
'competent authority': the national, supranational or international body / organisation vested with the authority for making decisions concerning the issue in question. May be a national pharmacopoeia authority, a licensing authority or an official control laboratory.

'unless otherwise justified and authorised' means that the requirements have to be met, unless the competent authority authorises a modification or an exemption where justified in a particular case.

Etc...







#### **Alternative methods**

- Ph. Eur. tests = reference methods, alone authoritative in cases of doubt or dispute.
- Compliance required, but alternative methods may be used: same pass/fail decision
- Users' responsibility to demonstrate their suitability. Approval of competent authority needed in any case

The EDQM does not decide if acceptable or not!





#### **Alternative methods**

#### Example:

- You may replace an existing HPLC method (impurities or assay) by an alternative one, provided the alternative method is cross-validated against the official one and leads to the same pass/fail decision.
- ★ Not possible to replace a selective HPLC assay by a volumetric titration [since the same pass/fail cannot be obtained].

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#### Flexibility in the Ph. Eur. Waiving of tests





- In some cases, some tests may be omitted based on validation data or other suitable justification
- Tests for process-specific impurities may be omitted if it is demonstrated that they will not occur with the particular process used e.g. boron in salbutamol





#### **Waiving of tests**

"(1) An article is not of Pharmacopoeia quality unless it complies with all the requirements stated in the monograph. This does not imply that performance of all the tests in a monograph is necessarily a prerequisite for a manufacturer in assessing compliance with the Pharmacopoeia before release of a product. The manufacturer may obtain assurance that a product is of Pharmacopoeia quality on the basis of its design, together with its control strategy and data derived, for example, from validation studies of the manufacturing process."

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#### Flexibility in the Ph. Eur. PAT

"(2) An enhanced approach to quality control could utilise process analytical technology (PAT) and/or real-time release testing (including parametric release) strategies as alternatives to end-product testing alone. Real-time release testing in circumstances deemed appropriate by the competent authority is thus not precluded by the need to comply with the Pharmacopoeia."





#### What does compliance mean?

- All mandatory parts of a monograph

  ("Unless otherwise indicated in the General Notices or in the monographs, statements in monographs constitute mandatory requirements." Characters section, second identification test and storage section not
- Compliance throughout period of validity for preparations.
- A distinct period of validity and/or specifications for opened or broached containers may be decided by licensing authority for each preparation
- Compliance until end of shelf-life for all other items: API, excipients, ...

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mandatory)





#### What to do when implementing a method?

- Validation of pharmacopoeial methods. The test methods given in monographs and general chapters have been validated in accordance with accepted scientific practice and current recommendations on analytical validation. Unless otherwise stated in the monograph or general chapter, validation of the test methods by the analyst is not required.
- Implementation of pharmacopoeial methods. When implementing a pharmacopoeial method, the user must assess whether and to what extent the suitability of the method under the actual conditions of use needs to be demonstrated according to relevant monographs, general chapters and quality systems.
- # Demonstration of suitability: Each MAA still to provide to the competent authority demonstration that tests in the monograph are appropriate for the quality control of their product.





#### **Reference to regulatory documents**

• "These references are provided for information for users for the Pharmacopoeia. Inclusion of such a reference does not modify the status of the documents referred to, which may be mandatory or for guidance."

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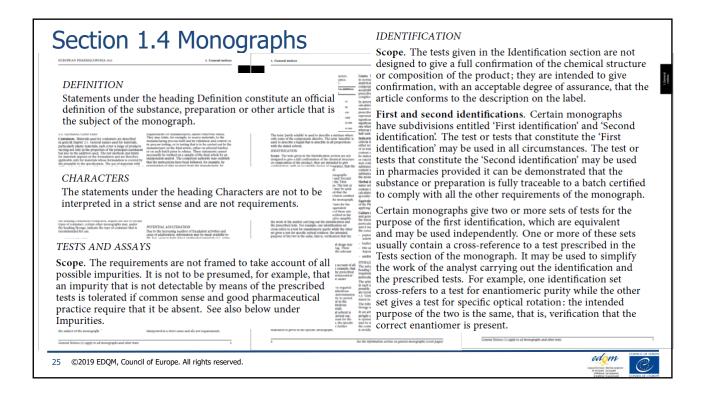


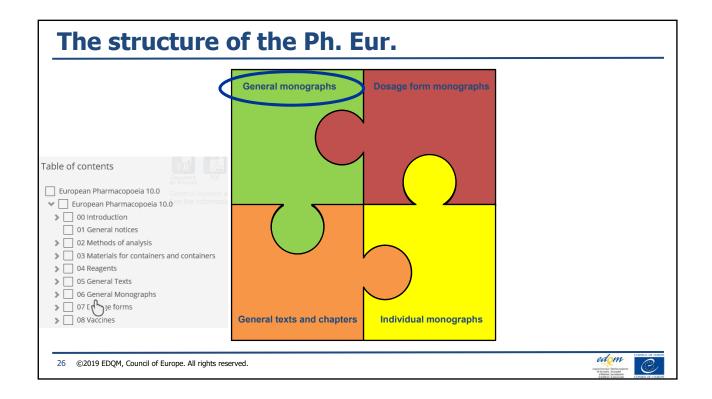
#### **Human and veterinary use**

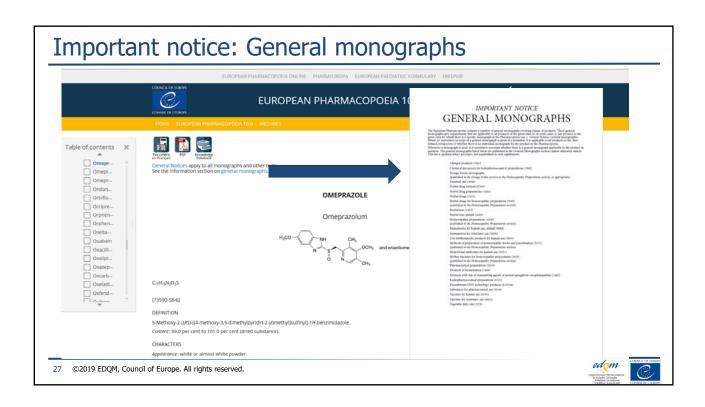
- Unless otherwise stated, monographs cover human and veterinary use.
- Where a substance is used in both human and veterinary products, the same quality specification is applied.
- When the monograph title bears "for veterinary use" the substance is intended only for veterinary products e.g. *Levamisole for veterinary use*

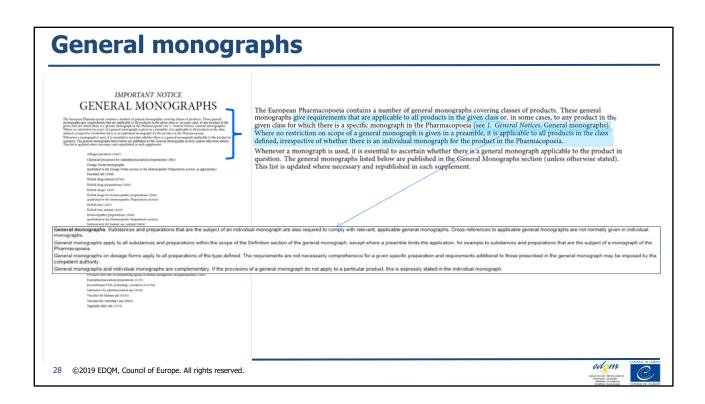












#### **General monographs**

#### Two types:

General monographs on classes of substances

*e.g.* Products of fermentation, Allergen products, Herbal drugs, Essential oils, Monoclonal antibodies for human use, etc.

General monographs on dosage forms

e.g. capsules, tablets, parenteral preparations, eye preparations, etc.

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#### **General monographs**

- Deal with aspects that cannot be treated in each individual monograph
- "General monographs apply to all substances and preparations within the scope of the Definition section of the general monograph, except where a preamble limits the application, for example to substances and preparations that are the subject of a monograph of the pharmacopoeia."





#### **General monographs**

• No cross-reference in individual monographs: "Whenever a monograph is used, it is essential to ascertain whether there is a general monograph applicable to the product in question."

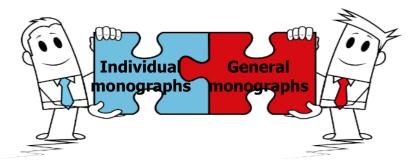
**CHECK** WHICH GENERAL MONOGRAPH APPLIES!

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#### **General vs. individual monographs**

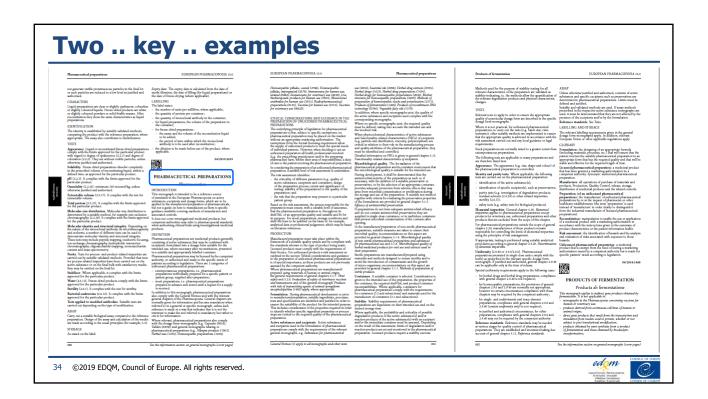


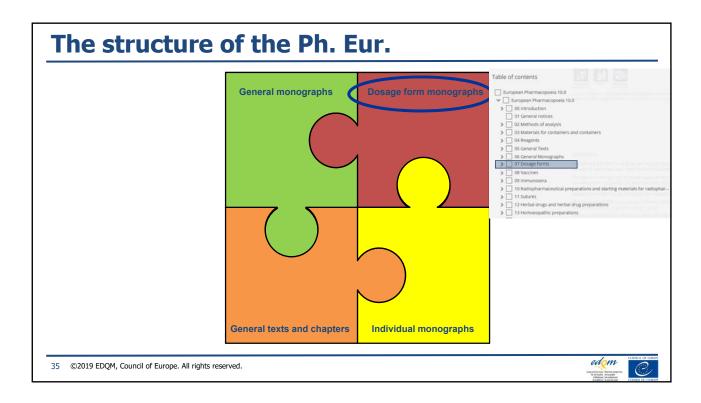
- Complementary
- · One not overruling the other
- Exceptions are clearly indicated either in the general monograph or in the individual one

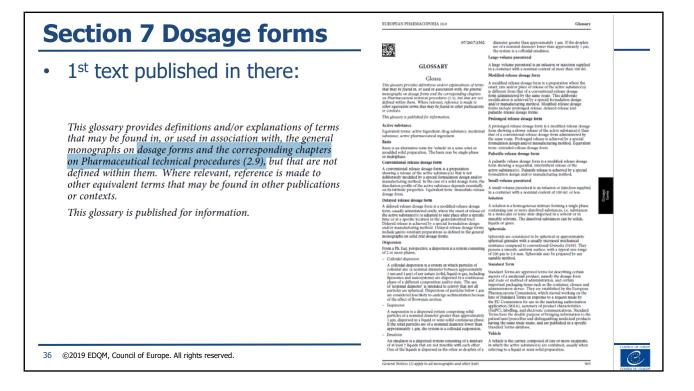


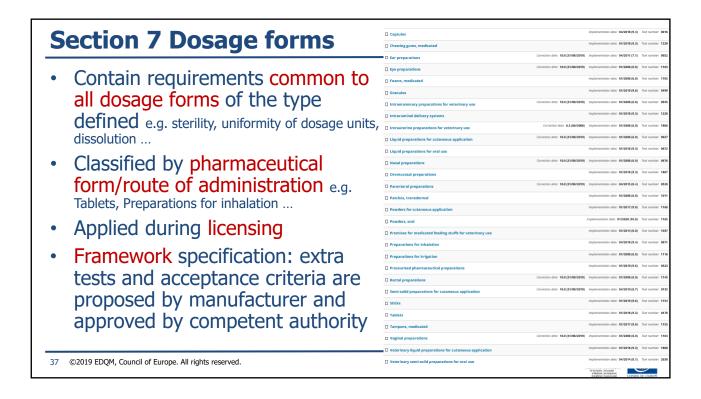


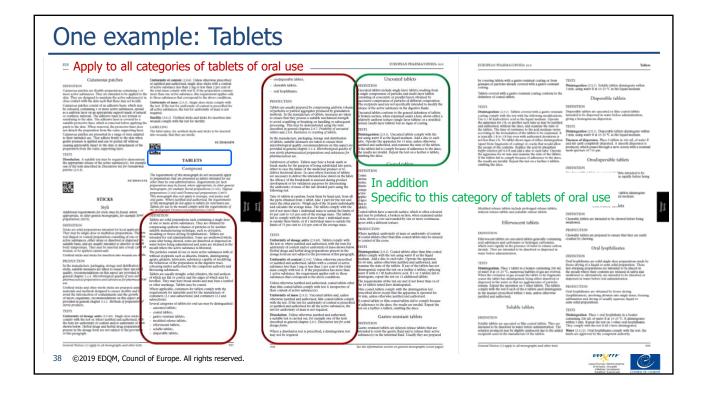
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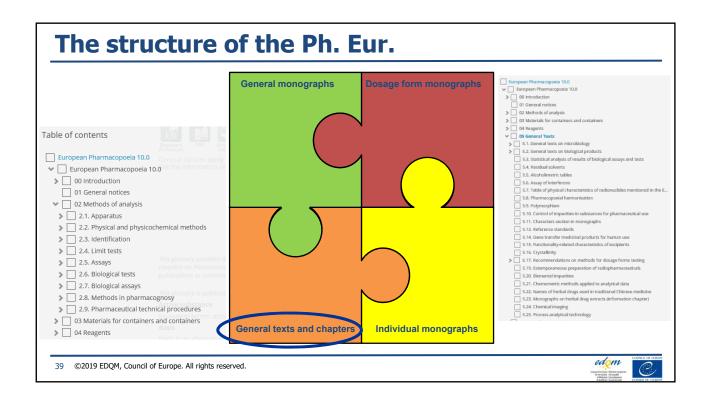












#### Why general chapters?

#### Analytical methods:

- Editorial convenience: avoid repeating standard methods in each monograph
- · Provide standard methods that can be used when there is no monograph
- Give general requirements for equipment, equipment qualification or calibration





#### **General chapters**

- Not mandatory "per se"
- When referred to in a monograph, they become part of the standard
- Can be used for substances not covered by monographs → may need validation
- Some general chapters are not referred to in any monograph (2.4.30 EG and DEG in ethoxylated substances): useful guidance, can be referred to in applications

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#### **General texts**

- Are often published for information and guidance.
- Aspects that cannot be treated in each individual monograph ≠ standard methods
- Become mandatory when referred to in a monograph





#### **Examples**

 5.10. Control of impurities in substances for pharmaceutical use referred to in general monograph Substances for pharmaceutical use (2034) → chapter 5.10 applies to all APIs (whether or not an individual monograph exists in the Ph. Eur.)

Where a substance for pharmaceutical use not described in an individual monograph of the Pharmacopoeia is used in a medicinal product prepared for the special needs of individual patients, the need for compliance with the present general monograph is decided in the light of a risk assessment that takes account of the available quality of the substance and its intended use.

**PRODUCTION** 

Substances for pharmaceutical use are manufactured by procedures that are designed to ensure a consistent quality and comply with the requirements of the individual monograph or approved specification.

The manufacture of active substances must take place under conditions of good manufacturing practice.

The provisions of general chapter 5.10 apply to the control of impurities in substances for pharmaceutical use.

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#### **Examples**

- 5.10. Control of impurities in substances for pharmaceutical use referred to in general monograph Substances for pharmaceutical use (2034) → chapter 5.10 applies to all APIs (whether or not an individual monograph exists in the Ph. Eur.)
- 5.4 Residual solvents referred to in general monograph 2034 → chapter 5.4 applies to APIs and excipients covered by 2034

Where a substance for pharmaceutical use not described in an individual monograph of the Pharmacopoeia is used in a medicinal product prepared for the special needs of individual patients, the need for compliance with the present general monograph is decided in the light of a risk assessment that takes account of the available quality of the substance and its intended use.

Residual solvents are limited according to the principles defined in chapter 5.4, using general method 2.4.24 or another suitable method. Where a quantitative determination of a residual solvent is carried out and a test for loss on drying is not carried out, the content of residual solvent is taken into account for calculation of the assay content of the substance, the specific optical rotation and the specific absorbance.

#### **Examples**

- 5.10. Control of impurities in substances for pharmaceutical use referred to in general monograph *Substances for pharmaceutical use (2034)* → chapter 5.10 applies to all APIs (whether or not an individual monograph exists in the Ph. Eur.)
- 5.4 Residual solvents referred to in general monograph 2034 → chapter 5.4 applies to APIs and excipients covered by 2034
- 5.20 Elemental impurities reproduces the essentials of ICH Q3D guideline, is referred to in general monographs 2619 Pharmaceutical preparations and 2034 Substances for pharmaceutical use for ex.

**Elemental impurities.** General chapter 5.20. *Elemental impurities* applies to pharmaceutical preparations except products for veterinary use, unlicensed preparations and other products that are excluded from the scope of this chapter.

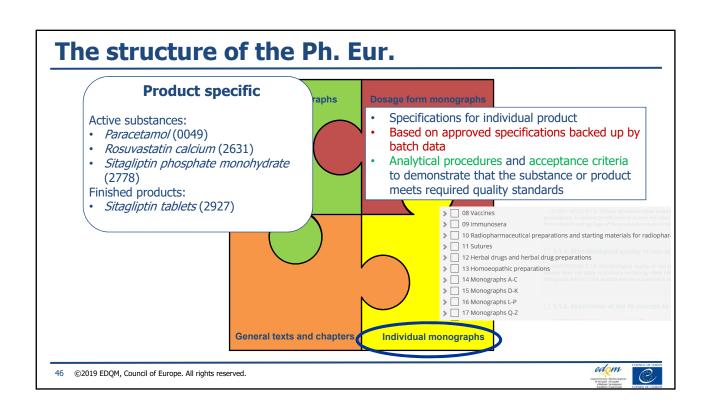
For pharmaceutical preparations outside the scope of general chapter 5.20, manufacturers of these products remain responsible for controlling the levels of elemental impurities using the principles of risk management.

If appropriate, testing is performed using suitable analytical procedures according to general chapter 2.4.20. Determination of elemental impurities.

Elemental impurities. Permitted daily exposures for elemental impurities (e.g. as included in the ICH Q3D guideline, the principles of which are reproduced in general chapter 5.20. Elemental impurities) apply to the medicinal product. Individual monographs on substances for pharmaceutical use therefore do not contain specifications for elemental impurities unless otherwise prescribed.







#### Thank you for your attention



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