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The USP Excipients Stakeholder Forum
Meeting #1
June 7, 2013

Meeting Summary

Stakeholder Forum Purpose

- Provide an overview of USP and its standards setting process for USP-NF Excipient monographs and General Chapters
- Provide updates on excipient topics of interest, including modernization of excipient monographs
- Receive stakeholder feedback on excipient and related standards

What we heard?

Key updates and themes from presenters included:

- **Elemental Impurities Advisory Group**—USP has formed a non-standards-setting Advisory Group to address implementation issues with Elemental Impurities General Chapters, and Working Groups will address three areas of focus:
  - Implementation requirements related to <232> and <233>
  - The omission of <231>
  - Special impact on manufacturers
  - USP will keep stakeholders informed through web postings on the Elemental Impurities Key Issue page (http://www.usp.org/usp-nf/key-issues/elemental-impurities)

What we heard?

- **Globalization's Impact on Excipient Quality**—A number of threats to drug quality and patient safety are emerging (i.e., tampering and diversion, re-introduction of expired drugs in supply chain, misrepresentation and falsification of drugs and drug ingredients, adulteration and substitution). Regulations, inspections, GMPs, better management of outsourcing, and standardization and convergence of standards all aim to help.

- **Excipients Stakeholder Roundtable**—Several organizations welcome the opportunity to work with USP in the standards-setting process and encouraged others to look for similar opportunities.

What we heard? (cont.)

- **Excipient Monograph Modernization**—This initiative began with the FDA Monograph Modernization Task Group. The primary driver of USP's modernization effort is maintaining up-to-date quality standards to support USP's commitment to public health. The need for modernization comes from a monograph's age, a need to reflect current practices, public comments, or lack of specificity in terms of outdated identification and assay test procedures.

- **Excipient Monographs in the *Medicines Compendium* (*MC*)**—This USP compendium is for medicines approved in any country and is applicable primarily to medicines legally marketed outside of the U.S. Monographs in this compendia include three types of tests: Performance-Based Monograph, Reference Procedures, and Acceptable Procedures .

Questions & Comments

Participants made a number of key questions and comments, including:

- Consider implementation of Elemental Impurity General Chapters in "blocks" (a roll-in) of materials to help with technical issues.

- Is it possible to confirm whether the *General Notices* update will be implemented before, at same time, or later than, the ICH Q3D Step 4/5?
  - The implementation time line will be under discussion by the Advisory Group.

- Does FDA get applications for new excipients and what types (i.e., biologics or non-biologics)?
  - Not many but we do get requests for evaluations. Inclusion of new excipients is welcome.

- Will FDA formally endorse ANSI NSF 363 certification?
  - FDA is considering how this standard could be used, and this remains to be determined. Industry should do more audits of their suppliers.

Questions & Comments (cont.)

- Natural variability in excipients will pose challenges for USP's spectral library.
  - USP encourages participations from stakeholders to contribute to this, particularly through its "Wiki" model.
- Fast techniques such as Raman and Near IR need to be compatible with other techniques.
- When an excipients monograph is in both *NF* and *FCC*, how will modernization be handled?
  - USP would need to work with the sponsor to determine if they would be willing to work on both at the same time. The article's intended use may complicate concurrent modernization.
- How will USP modernization impact harmonization with Ph.Eur. monographs?
  - If the *NF* monograph is on the PDG work program, additional steps, including the involvement of PDG, will be required. However, FDA-requested modernizations to USP-NF excipient monographs will be developed to satisfy local regulatory requirements.

Questions & Comments (cont.)

- Understanding the requirements of General Chapters with *MC* is complex.
- Critical quality attributes should be in monographs, but use of the term ‘critical’ may need further consideration. Other factors determine criticality.

Thank You