



USP Dietary Supplements Stakeholder Forum

Tuesday, May 15, 2018

USP Probiotics Program

Mike Bradley, Ph.D.

Member – USP Probiotic Expert Panel

Member – USP Non-Botanical Dietary Supplement Expert Committee

Kit Goldman, Ph.D.

USP Staff – Director, Dietary Supplements and Herbal Medicines



Industry Perspective – USP Probiotic Standards

Mike Bradley

Member, USP Probiotic Expert Panel

Member NBDS EC



I. Opening Remarks

- USP General Chapters
- USP Monographs
- US Dietary Supplement Regulatory Oversight System
- International Regulatory Submissions – Government Agencies



II. Probiotic Standards – General Comments

- Unique Dietary Ingredient – Biological
- Dietary Supplement Health & Education Act (DSHEA)
- Probiotic Raw Materials
- Probiotic Finished Dosage Forms



III. Industry Challenges with Probiotics – Finished Dosage Forms

- Product Development – Quality by Design
 - Incompatible Ingredients
 - Overages by Design
 - Combination Products
 - Product Lifecycle Management



III. Industry Challenges with Probiotics – Finished Dosage Forms (Cont.)

- Stability Testing
 - Testing Protocols & Conditions
 - Extrapolation of Data
 - Acceptance Criteria
 - Shelf Life Assignment
 - Corrective Actions / Reformulation



III. Industry Challenges with Probiotics – Finished Dosage Forms (Cont.)

- Identity Testing
 - Test Method Standardization (DNA, Selective Media, Biochemical Reactions)
 - Combination Products (RMs and FDFs)
 - Species versus Strain



III. Industry Challenges with Probiotics – Finished Dosage Forms (Cont.)

- Compliance Requirements – 21 CFR 101.9(g)
 - Measurement Uncertainty
 - Efficacy versus Potency
 - Reduced Testing Applications





Expert Panel / Expert Committee

- USP Non-Botanicals Dietary Supplement Expert Committee
- Probiotics Expert Panel
- Identity, Strength, Purity, Composition
- Limits on Contaminants

USP Probiotics Expert Panel



- USP appointed Dr. Mary Ellen Sanders to chair the panel.
- “Call for Candidates” in Feb 2017
- Formed Expert Panel in April 2017

The screenshot shows the USP website's 'Call for Candidates' page. At the top left is the USP logo (U.S. Pharmacopeial Convention) and the text 'Call for Candidates'. On the top right is a 'Log In' button with a user icon. Below this is a navigation bar with links for HOME, COMMITTEES / PANELS, FAQs, and CONTACT US. A breadcrumb trail shows '< Back to Committees'. The main heading is 'Probiotics'. Below that, a summary bar displays: POSITION: Member, DEADLINE: Mar 3, 2017, REF#: 4416. The 'Role(s):' section contains the following text: 'In accordance with Section 5 of the Rules and Procedures of the 2015-2020 Council of Experts, the Chairperson of the Council of Experts forms with this charge the Probiotics Expert Panel. The purpose of this Expert Panel is to develop quality standards for probiotics used for dietary supplements. The Expert Panel will work at the direction of the Expert Committee responsible for the monograph, the Non-Botanical Dietary Supplements Expert Committee chaired by Dr. Dennis Gorecki. The candidate Chair of the Expert Panel is Mary Ellen Sanders, Ph.D. Expert Panel membership and additional background information are included below.'

USP Probiotics Expert Panel (cont'd)



Name	Member	Affiliation
Sanders, Mary Ellen	Chair	ISAPP
Elkins, Chris	Government Liaison	CDC
Davis, Cindy Dyann	Government Liaison	NIH
Dreher-Lesnick, Sheila	Government Liaison	NIH
Tartera, Carmen	Government Liaison	FDA
Boyte, Marie Eve	Member	Lallemand Health
Burguière, Pierre	Member	AMA Research Solutions
Jackson, Scott	Member	NIST
Keller, David	Member	Ganeden
Pane, Marco	Member	Probiotal Healthcare
Schoeni, Jean L.	Member	Covance
Stahl, Buffy	Member	DuPont
Vegge, Christina	Member	Chr Hansen
Brooks, James	EC	USP-NBDS
Bradley, Mike	EC	USP-NBDS
Roe, Amy	EC	USP-NBDS

Activities to date



- To date, eight official meetings via conference calls
- One face-to-face meeting October 25, 2017
- Reviewed monographs for *Bacillus coagulans* and *B. coagulans* capsules
- General Chapter <64> Probiotics Tests

Bacillus coagulans and *B. coagulans* capsules Monographs



- ▶ Title: Changed to species level
- ▶ Definition: Changed to species level
 - To limit number of individual monographs.
 - Additional strains will be added as monographs are received
- ▶ Identification – PCR based primers shown to be specific for the strain
- ▶ Enumeration – currently cfu/g
- ▶ Performance tests for *Bacillus coagulans* Capsules
- ▶ Contaminants – harmonize with FCC
- ▶ Additional requirements – storage
- ▶ Approved by EC in February 2018 ballot

GC <64> Probiotic Tests



- ▶ Chapter provides tests procedures for typical probiotic testing requirements for ID, enumeration, contaminants and other required tests
- ▶ Chapter reorganized with sections for spore-forming, non-spore forming and yeast and mold probiotics for clear differentiation
- ▶ Labeling
 - Ingredients – strain specific label only
 - Dosage forms – An ingredient or a dosage form of probiotics should be labeled with the genus and species names, or genus, species, and strain names.
- ▶ Due to revisions chapter will be resubmitted to PF for comment in May 2018

Expert Panel Path Forward



- ▶ Standards to develop in Future
 - *Bifidobacterium longum* subsp. *longum*
 - *Bifidobacterium bifidum*
 - *Lactobacillus casei*
 - *Lactobacillus fermentum*
 - *Lactobacillus plantarum*
 - *Lactobacillus reuteri*
 - *Lactobacillus rhamnosus* GG
 - *Streptococcus thermophilus*
 - Others
- ▶ Publication of a peer-reviewed paper on probiotics related to specifications developed, new technology and 3rd party verification

USP Contacts



Maria Monagas
Scientific Liaison, DSHM
United States Pharmacopeia
MJM@USP.org
Phone: 301-230-6366

Kit Streusand Goldman, Ph.D.
Director, DSHM
United States Pharmacopeia
kit.goldman@USP.org
Phone: 301-692-3597

Mengmeng Niu
Associate Scientific Liaison, DSHM
United States Pharmacopeia
Mengmeng.Niu@USP.org

Questions



Empowering a healthy tomorrow

Thank You



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