IPQ INTERNATIONAL PHARMACEUTICAL QUALITY
Inside the Global Regulatory Dialogue

IPEC-Americas Joins Other Industry Associations in Providing Initial Feedback on FDA's Quality Metrics Draft Guidance at Aug. 24 Meeting

IPEC-Americas recommended to FDA at the public meeting on its quality metrics initiative and recently released draft guidance held in late August that the agency should finalize the guidance and resolve the outstanding questions for drug products and drug substances before considering applying quality metrics to excipients.

IPEC-Americas was among several industry associations that took FDA up on its invitation to provide initial feedback at the meeting, which was held at FDA's White Oak, Maryland headquarters on August 24.

In focus for IPEC-Americas was question four of the nine questions on which FDA asked for input, in particular, in its *Federal Register* announcement of the draft's release and the August meeting ***(see IPQ August 23, 2015)***. Question #4 asks if the agency "should explore collecting metrics from high-risk excipient producers, and if so, which excipients should be considered high-risk and what metrics should apply?"

> **In presenting the association's viewpoint, IPEC-Americas Chair-Elect Priscilla Zawislak pointed out that there is currently no definition for "high risk" excipients.**

It is the position of IPEC-Americas, she explained, that the risks relevant to the guidance are not related to the manufacture of the excipient but to their use in high risk products and/or applications.

Quality metrics, including those proposed by FDA in the guidance, are based on the manufacturing process. However, Zawislak noted, "most of the issues associated with excipients being labelled as 'high risk'" have been related to supply chain integrity and economically motivated adulteration and "are typically not related to the manufacturing process."

The use of excipients in a variety of applications that have varying risk profiles "makes it nearly impossible to assess whether the excipient should be considered high risk or not relative to quality metrics for the manufacturing process."

IPEC-Americas also expressed interest to the FDA panel at the meeting in understanding better how the expectations for API metrics reporting outlined in the guidance would apply to "atypical" actives, given that excipient manufacturers may not have knowledge of that use.

Comment Period Extended to Nov. 27

In line with industry requests voiced at the meeting for more time to digest the draft guidance and consider the questions the agency had asked for more input on in particular, FDA announced in the August 27 *Federal Register* that it was providing a 60-day extension on the written comment period to November 27, 2015.

> **All of the industry associations appearing at the August hearing, including IPEC-Americas, indicated they will be fleshing out the concerns and suggestions they were making at the hearing in their subsequent written comments.**

Moderating the meeting was Office of Pharmaceutical Quality (OPQ) Office of Policy for Pharmaceutical Quality (OPPQ) Acting Deputy Director Brian Hasselbalch. An overview of how the metrics initiative fits into the larger effort by the agency to upgrade its quality regulatory processes was provided by CDER Director

Janet Woodcock, followed by more detailed discussions of the metrics initiative and guidance by two other OPQ officials – OPPQ Acting Director Ashley Boam, and Office of Strategic Programs Senior Advisor Ron Fitzmartin.

Along with IPEC-Americas, industry associations presenting their viewpoints included ISPE, PDA, GPhA, CHPA, PhRMA and SOCMA.

The associations generally pledged their support for the intent of the quality metrics initiative and its goals before outlining their implementation recommendations and the potential impacts specific to their members.

Phased implementation, reporting burden and the nuances of site versus product reporting were among the focal points of the association comments. Also drawing attention at were the statutory authority for the reporting expectations delineated in the guidance and their application to API suppliers and contractors.

> **OPQ Office of Surveillance Acting Director Russell Wesdyk provided the concluding remarks at the meeting. He noted a few key themes he heard expressed and indicated that a final draft of the guidance was not expected until next year.**

Wesdyk explained FDA's intent to "minimize the burden" of the program. Metrics will not be used in isolation to make regulatory decisions, he stressed, adding that the initial learning period will be used to study relations that metrics have with potential signals and outcomes.

[A full review of the FDA August 24 meeting will be included in the next IPQ Monthly Update. By special arrangement with IPEC, excipient suppliers who are members can receive a company-wide license for the normal price of the subscription for an individual user. The license allows everyone in a company to access all of IPQ's coverage of the key drug/biotech CMC and GMP issues globally and the full searchable archives. Contact Wayne Rhodes (rhodes@IPQPubs.com, (202) 841-9720) for more information. IPQ will be providing in-depth coverage of a key excipient regulatory issue in each of its Monthly Updates, with an excerpt included in IPEC's Insider.]