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U.S. Pharmacopeial Convention

Veterinary Drugs Stakeholder Forum Meeting # 2 Summary

A.R. Matura, Chair
Review of Day 1
Thursday, February 20, 2014

Stakeholder Forum Purpose

- Enable an exchange of information and perspectives, with the ultimate goal of improving USP standards and information
- Inform stakeholders of USP's current compendial initiatives
- Hear from stakeholders on their compendial issues

Working with USP in the Standards-Setting Process

Why and How to Work with USP (Robert Shimahara)

- Active participation in monograph development
- Contribute Bulk donations to qualify USP Reference Standards
- Comment on *Pharmacopeial Forum*
- Attend USP events
  - Stakeholder Forums
  - Workshops
  - Global Education and Training

Working with USP in the Standards-Setting Process

Excipients and Harmonization Overview (Catherine Sheehan)

- Pharmacopeial Discussion Group (PDG) is the primary mechanism for harmonization and operates via a multi-step review and approval process.
- FDA and USP formed a U.S. delegation to PDG
  - FDA has direct input into the pharmacopeial harmonization process
- PDG remains linked to ICH-Q4B for revision to standards previously deemed interchangeable by ICH-Q4B
- Benefits to stakeholders and pharmacopeias
  - Elimination of redundant testing; and multi-compendial compliance
  - Stronger monographs with a global set of experts setting and reviewing standards
  - Specifications (test methods) are representative of the global supply chain
  - Minimizes duplication of testing requirements, eliminating inconsistent standards internationally.

Working with USP in the Standards-Setting Process

Discussion topics

- Inclusion in search engines or PubMed could help with broader communication of information from *PF*
- USP's relationship with USDA Center for Biologics for vaccines for animal health
- Stage 4 of the PDG process is very important. Stage 6 is too late to comment

Role of USP Monographs

CVM Perspective (Sanja Modric)

- The FDA Center for Veterinary Medicine (CVM) regulates:
  - Animal drugs
  - Animal feeds
  - Veterinary devices
- FDA approval and regulations of animal drugs is similar in theory and practice to the approval of human drugs; however, there are multiple species considerations.
- CVM collaborations with USP:
  - Review of bi-monthly *Pharmacopeial Forum* and *USP-NF* revision proposals
  - Input from pertinent office(s)/division(s)
  - Collaboration with CDER
  - Participation on USP Expert Committees and Expert Panels
    - Non-voting status (government liaison)

Role of USP Monographs

Industry Perspectives: Why and How to Work with USP (Anthony Lucas)

- Why
  - Maximize the benefit of the time, cost and effort spent updating older monograph methods and minimize re-work (i.e., non-optimal resource usage, having to repeat the work when the monograph is revised)
  - However, it may make it easier for future generics to get approved, as method development will be easier
- How
  - Provide USP with product's methods to include in monographs
  - API and impurity standards for custom synthesis
  - Work with USP whenever the monographs that affect products are in the process of being updated to minimize the impact

Role of USP Monographs

Industry Perspectives: Challenges of Working with USP (Rob Hunter)

- Potential disclosure of trade secrets and confidential information is an issue
- Manufacturer may not have ownership of the drug master file

Role of USP Monographs

Discussion topics

- Challenge: Adapting USP monographs used for human drug products for veterinary use
- More information is needed on the flexible monograph approach
- USP is the minimum requirement for some
- Not all organizations have dedicated staff or other resources (vs. human drug companies) to work with USP

Updates on USP General Chapters

General Chapters <1151> *Pharmaceutical Dosage Forms* and <1152> *Animal Drugs for use in Animal Feeds* (Will Brown)

- <1151>
  - Addresses dosage forms
  - Intended to apply to animal as well as human dosage forms.
  - Expected to undergo continuous revision
- <1152>
  - Addresses animal drugs for use in animal feeds
  - “Premixes” is not a preferred term

Updates on USP General Chapters

Injections and Packaging (Will Brown on behalf of Desmond Hunt)

- Revisions to General Chapter <1> include:
  - Title change
    - General Chapter <1> *Injections and Implanted Drug Products (Parenterals) - Product Quality Tests*
  - Content revised to fit into approach taken for the five route chapters
  - Some content moving to other general chapters:
    - <7> *Labeling*
    - <659> *Packaging and Storage Requirements*
    - <697> *Container Content for Injections*
- All chapters, <1>, <7>, <659>, and <697> will move to official status at the same time
- Several new packing standards published in *PF* 39(5) [Sept 2013]

Updates on USP General Chapters

Expert Panel on Veterinary Products (Margareth Marques)

- Next steps for General Chapter <1236> *Determination of Thermodynamic Solubility of Active Pharmaceutical Ingredients for Veterinary Species*
  - Collect more information about the conditions for cattle
  - Publish new Stimuli article with the rational for the new general chapter
  - Develop the text for the chapter
  - Next possible species: cats and pigs
  - Workshop – March 14 – 15, 2016

Updates on USP General Chapters

Elemental Impurities (Kahkashan Zaidi)

- Implementation of Elemental Impurities - *Supplement 2 to USP 38—NF 33* with an official date of December 1, 2015. This includes:
  - Implementation of general chapters <232> for drug products and <2232> for finished dietary supplements
  - Omission of General Chapter <231> *Heavy Metals*
  - Removal of all references to General Chapter <231> from monographs and general chapters in the *USP—NF*
- General Chapter <232> *Elemental Impurities—Limits* applies to only drug products; it does not apply to dietary supplements or veterinary products

Updates on USP General Chapters

CVM Perspective on Elemental Impurities (Mike Brent)

- CVM expects sponsors of veterinary drug products to apply a risk-based control strategy for elemental impurities as described in USP <232> and draft ICH Q3D.
- Emphasis on supplier communication for identification of potential sources of elemental impurities in the drug product.
- No testing for elemental impurities is expected in cases where a material is deemed low risk.
- Where a test for specified elements is necessary, the method should be validated as described in USP <233>.

Updates on USP General Chapters

Discussion topics

- Dosage forms vs. premixes
- CVM was primary source for public comments on dosing standards
- “Who is USP?” – a USP standard is the product of the Expert Committee, but has many influences (requests for revision, workshops and stakeholder forums, public comments, etc.)
- Injections and dosage forms
- Impact of changes to elemental impurities on harmonized monographs

Compounding Practices and Challenges

Veterinary Compounding: Current Rules and Practices (Lynne White-Shim)

- Supports appropriate and necessary compounding
- American Veterinary Medical Association (AVMA) policies:
  - Veterinary Compounding Policy
  - Bulk Compounding policies
    - For non-food animals
    - For food animals

USP Standards for Compounding (Gigi Davidson)

- USP's role
  - Compounding Expert Committee
    - Identifies need and develops preparation monogrph
  - Nomenclature, Safety, and Labeling Expert Committee
    - Approves preparation name
- Veterinary compounded preparation monographs
  - 5 currently official
  - 7 to be balloted by Expert Committee
  - 3 to be proposed in PF 40(2) Mar/Apr 2014
- USP currently prioritizing for the 2015-2020 cycle
- Opportunities for participation and outreach
  - Meetings, workshops, and webinars
  - Publications and Stimuli articles

Industry Challenges: Roundtable (Gary Fuller, Steve Sutherland, Jane Owens, Gigi Davidson)

The spirit of this discussion was largely focused on non-food animals.

- Not all suppliers of active substances are GMP approved.
- Consider the need for a defined list of bulk drugs.
- Veterinary drugs are in grey area for regulations.
- Veterinarians are not typically trained in chemistry and pharmacy.
- Is the internet pharmacist licensed in the state where veterinary drugs are shipped?
- A compounded drug is some times cheaper than the approved drug. Is the compounder using the approved product?
- Veterinarians need more information on compounded medicines and their liability.
- More active participation from the state boards is needed for veterinary medicines, as well as legislation and enforcement.

Thank You