USP Policy Communications, Reporting Thresholds

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USP Policy Changes, Communication Strategy and Industry Considerations on Recent Compendial Notices
Policy Development and Stakeholder Awareness

Policy Development Evolving
- Events encountered drive need for changes, often swift attention needed
- Policy process involves multiple principle input
  - Pharmacopoeial Alert System
  - FDA Communications
  - Expert Committee / Stakeholder Feedback / Project Teams, etc
  - Continuous Improvement Initiatives

Communication of Policy / Process Changes Important
- Engagement Early with Key Stakeholders would be valuable
- Standardization of Process/ Approaches for addressing these matters
- Visibility to Changes (how shared, where to find, implementation timelines and scope of application.

• Challenges and Opportunities within Industry
  - Awareness and Rationale for changes
  - Visibility across the wider audience within companies
  - Respond and React accordingly, often needs dialogue and planning

• Intent: Raise awareness, increased visibility for swift response to issues
• Desired Outcome: Establish policy, processes and procedures to drive consistency, reliability and awareness to USP notices for stakeholders
Policy Changes and Visibility to Industry

• Ex#1: USP / NF Global Health Monographs
  • PF Briefing – Specific Monographs Discussion
  • Increased visibility and on-going engagement to assure proper utilization (mechanism for placement of content in USP)

• Ex #2 Inclusion of Pop-Up and Notice Sartan Monographs

General Information Notice:
“FDA Resources for Angiotensin II Receptor Blockers Voluntary Recalls”

*Doesn’t give front line visibility to Monographs within USP impact*

*Inclusion of “Pop-Ups and notice linked to actual monographs; understanding by end users (regulators) and knowing application varies –subject to interpretation*
Policy Discovery

• Ex#3: Reporting Thresholds
  • Discussion in later slides

• Ex #4 Prospectus Posting

• Previously covered by CPI project team update

- Broad Notification
- Policy Details
- Developmental Reference

- Right First Time
- Gauge Implementation Consistency
- Confirm Intended Value
Reporting Thresholds

• Need for organization across initiatives to give final picture before proceeding
  • Modernization
    • Content (ID / Impurities / Assay / etc.)
    • Technology (Chromatography / etc.)
  • Impacted monographs
    Policy for addressing existing and upcoming PF proposals vs official adopted text
  • Impurities
    • <476> Control of Organic Impurities in Drug Substances and Drug Products
      • ICH Q3A and Q3B
  • Reporting Thresholds
    • ICH Q3A and Q3B
  • Genotoxic Impurities
    • ICH M7 – Q3A / Q3B: limited guidance is provided for those impurities that are DNA reactive
      • Reporting threshold is not an identification threshold. How will policy address highly toxic impurities beyond current monograph content?
Reporting Thresholds

• Where will expectations be defined?
  • General Notices, General Chapter?
• What are the requirements
  • Impurities ICH Q3A and Q3B
  • DNA Reactive Impurities ICH M7
• Scope
  • ICH guidelines have defined scope. What about USP application?
• Timeline
  • ICH go forward guidelines
  • Monographs pre-ICH filed limits to the current monograph
  • Impact: Reporting Threshold is reduced
    • Total Imp limit may need to be redefined
    • Method changes need to be confirmed
Reporting Thresholds

• Changes to monographs are significant and must be presented in PF
• How are sensitivity solution concentrations being defined with different possible values?
• What if existing method is not suitable for proposed changes?

Timeline
• ICH go forward guidelines
• Monographs pre-ICH filed limits to the current monograph
• Impact: Reporting Threshold is reduced
  • May not reflect current filing
  • Total Imp limit may need to be redefined
Industry would like to continue the discussion on these topics and continue to leverage communication to further explore these topics.