### Regulatory Approval Process for Drug Products Containing New Excipients with Case Studies

Wendy Dulin, Ph.D. Nov. 16, 2010



### Disclaimer

The opinions expressed in this presentation are those of the speaker and do not reflect the opinion of the FDA, EMEA or any other regulatory agency nor do they provide specific regulatory guidance. Pharmaceutical company: will not use an excipient in a product unless it's been "approved".



FDA: will not approve an excipient unless it is used in a product

# Reasons for Selecting an Excipient in a Formulation:

- 1. Global Regulatory Acceptance.
- 2. Safety.
- 3. Function in the formulation.
- 4. Physical & chemical compatibility with the active and other excipients.
- 5. Cost.
- 6. Formulator preference.
- 7. Stability.
- 8. Compatibility with the package.

# **Types of New Excipients**

- New grade of excipient
  - Change in *physical* form of the excipient (e.g. particle size, moisture content, density)
  - Ex.: Avicel PH101, 102, etc.; low-moist. Pregel. Starch
- Co-processed excipients
  - Two established excipients combined via a physical process (e.g. spray-drying) to produce an excipient with improved physicomechanical properties
  - Ex.: ProSolv (MCC/SiO<sub>2</sub>); Advantose (Fructose/Starch)
- New excipient (novel)
  - New chemical entity (includes longer polymer chain length)
  - Ex.: Cyclodextrins; Solutol (Macrogol 15-Hydoxystearate)

# **Types of New Excipients**

- New route of administration for an established excipient
  - Ex.: Inhalation grade Lactose
- Larger amount of excipient per day by a previously approved route of administration

### Definitions

FDA: Inactive ingredient: "any component of a drug product other than the active ingredient"

In the past: excipients were "inactive ingredients" (sucrose, cornstarch)

We now know excipients may impact solubility, bioavailability, stability, etc.

FDA: "New Excipient" - ingredients intentionally added to therapeutic and diagnostic products, but that are
(I) not intended to exert any therapeutic effects at the intended dosage (although they may act to improve product delivery)
(ii) not fully qualified by existing safety data with respect to the currently proposed level of exposure, duration of exposure, or route of administration.

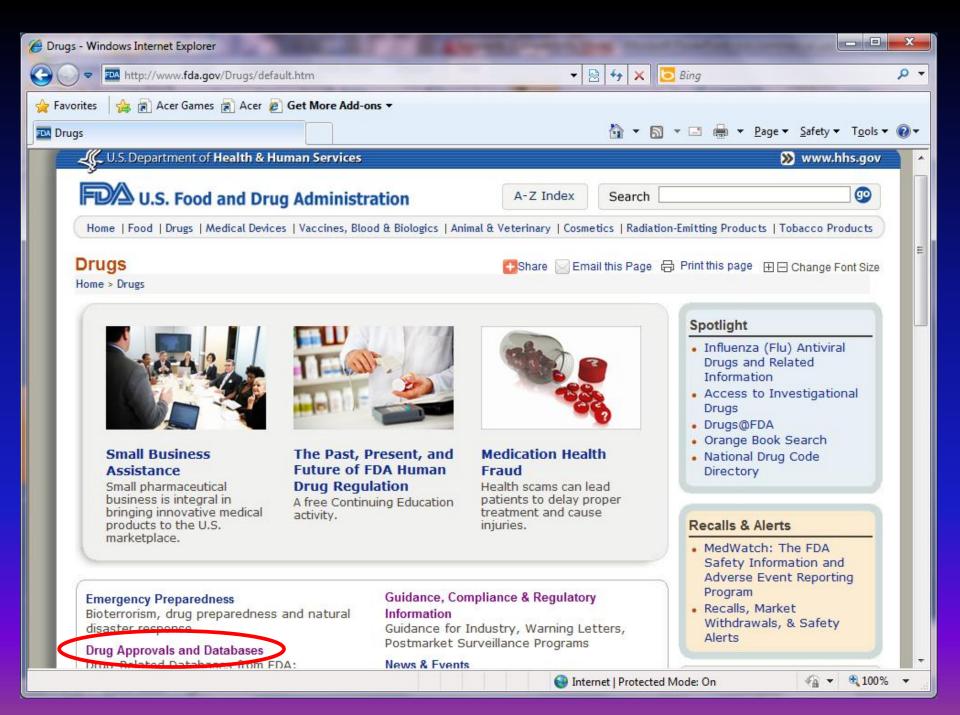
Guidance for Industry: Nonclinical Studies for the Safety Evaluation of Pharmaceutical Excipients, FDA, May 2005

### Acceptability of Excipients

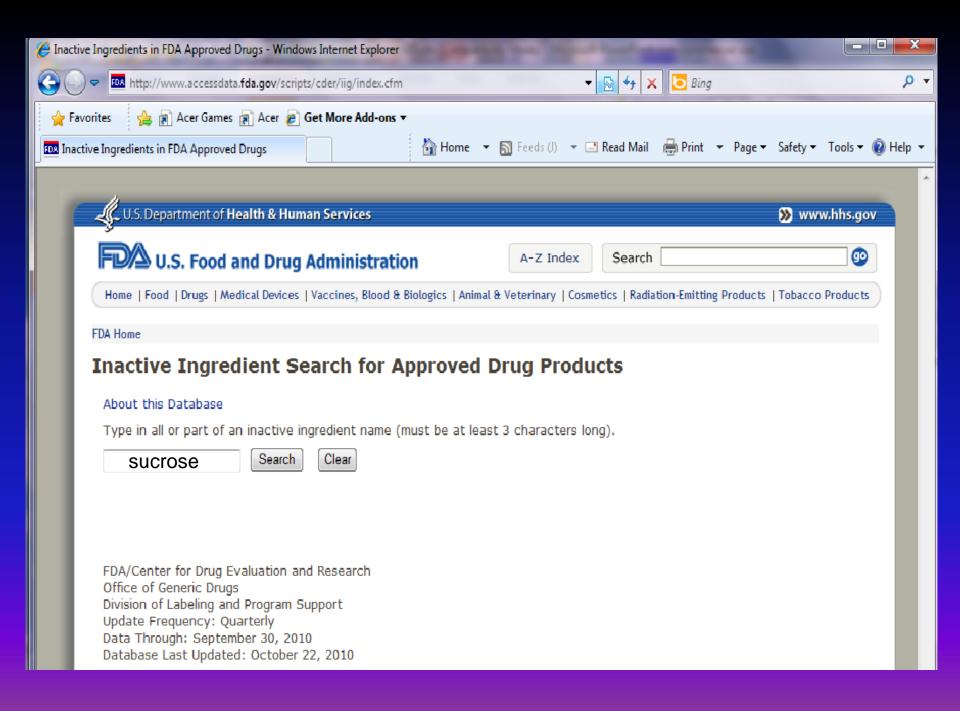
FDA Inactive Ingredients Database (IID) www.accessdata.fda.gov/scripts/cder/iig/ Ingredients in approved drug products Difficult to search; synonyms Amounts given in mg, %, mg/mL, etc. By route of administration Ingredient approved for parenteral administration may be considered "new" for oral use

### www.fda.gov

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Data package depends on what type of "new"

"As another example, excipients that are large polymers that differ from previously characterized excipients only in molecular weight (chain length) can be adequately characterized in an abbreviated manner using less safety data, provided that the new excipient and the previously studied excipient are sufficiently similar...We will consider such excipients on a case-by-case basis."

Guidance for Industry: Nonclinical Studies for the Safety Evaluation of Pharmaceutical Excipients, FDA, May 2005

FDA Guidance, May 2005, Nonclinical Studies for the Safety Evaluation of Pharmaceutical Excipients

 ICH Guidance: S7A Safety Pharmacology Studies for Human Pharmaceuticals
 S1A, S2B, S3A, S3B, S4A, S5A, S5B, M3
 Preclinical testing based on expected duration of exposure

- Short-term exposure (< 2 weeks)</li>
- Intermediate exposure (2 weeks to 3 months)
- Long-term exposure (> 3 months)

Will the new excipient be co-developed with a new drug substance?

If yes – "sponsors can develop new excipients concurrently with safety evaluation of new drug...by adding groups of animals that receive the excipient to studies that would have been conducted anyway to develop a drug substance"

If no – more resources for independent development of an excipient

Has the new excipient been used in humans?

Yes – food additive

"The Centers recognize that existing human data for some excipients can substitute for certain nonclinical safety data, and an excipient with documented prior human exposure under circumstances relevant to the proposed use may not require evaluation in the full battery of toxicology studies..."

#### Short-term Use (< 2 weeks)

Short-term and *infrequent* use. By the intended clinical route

 Acute tox - rodent & mammal not necessary to determine LD<sub>50</sub> may be omitted if high dose is used in repeat-dose studies
 ADME

3. Standard battery of genotoxicity studies

4. One-month repeat-dose tox studies – rodent & mammal

5. Repro tox

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Intermediate Use (2W – 3M)

3 months

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 ADME

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Intermediate Use (2W – 3M)

3 months ->6 months

Long-term Use (>3M) Long-term Use (>3 months) Carcinogenicity testing ref. ICH S1A The Need for Long-term Rodent Carcinogenicity Studies of Pharmaceuticals

- 2-year carcinogenicity bioassays in two appropriate species OR
- 2-year carcinogenicity study in one rodent species plus an *alternative* in-vivo model **OR**
- Documentation providing scientific justification that carcinogenicity data are not necessary

- Photosafety
- Sponsor is encouraged to contact the appropriate division for specific questions
- FDA may ask for additional studies
- Pulmonary, Injectable and Topical products have additional guidance

Previous slides describe *nonclinical* studies for safety evaluation of excipients

Additionally need clinical studies, usually a placebo in clinical trials for a new drug product

# DMFs

Drug Master Files - enable manufacturers of components used in a drug product to submit information to the FDA for review and the information remains <u>confidential</u>

Applicant – gets a *letter of authorization* from the manufacturer for their DMF – included in filing

DMFs are not approved Excipients are a Type IV DMF

Guideline for Drug Master Files, FDA, Sep 1989

Development of a USP/NF Monograph Proposed monograph data package for a new excipient goes to USP expert committee on excipients for review

- If accepted  $\rightarrow$  PF for public comment
  - If no comment  $\rightarrow$  committee may allow it to become official monograph in 60 to 90 days
  - Comments  $\rightarrow$  back to committee  $\rightarrow$  revise or leave as is  $\rightarrow$  publish revised monograph in PF
- Normally takes 6 to 15 months for monograph to be published
- \*NEW\* PENDING MONOGRAPHS authorized but not official, cannot use USP or NF

# **USP/NF** Monographs

Once published – recognized as official and gov't agencies are authorized to enforce them to assure that products in the US are in total compliance

Also, future filings may simply state that the excipient will comply with the USP/NF monograph without supplying the tests, methods or safety data.

"Inclusion of an excipient in a USP/NF monograph or other non-FDA document is not an indication that the substance has been reviewed by the FDA and found safe for use" (May 2005 Guidance)

### **Food Additives**

**Food Additive Petition** "Listing of Food Additive Status" GRAS (Generally Recognized as Safe) **JECFA** (Joint Food & Agriculture and World Health Organization Expert Committee) Japan – food additives are considered as new excipients when used in a drug formulation

Listing of Food Additive Status (FDA)

#### www.fda.gov/Food/FoodIngredientsPackaging/FoodAdditives/FoodAdditive Listings/ucm091048.htm

Food Additives > Listing of Food Additive Status Part II - Windows Internet Explorer			
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cakes, cake mixes, fillings, icings, pastries, and toppings - 1/2./65

- Sucralose NNS, REG, GMP, Sweetening agent -172.831
- Sucrose NUTRS, GRAS, GMP 184.1854
- Sucrose acetate isobutyrate (SAIB) STAB, REG, Used as a stabilizer of emu beverages not to exceed 300 milligrams/kilogram of the finished beverage - 172.
- Sucrose fatty acid esters REG, GMP, For use as emulsifier, texturizer, and confections, frostings, surimi-based seafood products, coffee and tea beverage

"...in an amount not to exceed that reasonably required to accomplish the intended effect"

# For JECFA: www.inchem.org/pages/jecfa

GRAS

GRAS distinguished from food additive in the common knowledge about the safety of the substance

GRAS notification  $\rightarrow$  90 days, FDA responds:

(1) agency does not question the determination

(2) notice does not provide sufficient basis for GRAS determination

Case Study: IPEC New Excipient Safety Evaluation Procedure

Minimize risk

NEEC – New Excipient Evaluation Committee, independent expert review

Minimize need for new studies to support safe use of an excipient

### Wyeth's approach to First-in-Human Formulation Development

- Bonafide formulations with Right-First-Time approach to avoid PK bridging between clinical trial phases
- One formulation from FIH to Proof-of-Concept 90%
- POC to commercial 80%
- Trend to APIs with low water solubility
- Across 55 FIH oral products from 2003 to 2009, 18.2% were solution or semisolid in capsule
- Goal: To have the best formulation in terms of delivering the drug, room temperature stability, global acceptability and reasonable cost

### **Cremophor vs Solutol**

Cremophor<sup>®</sup> EL (Polyoxyl 35 Castor Oil, NF)

Cremophor<sup>®</sup> RH40 (Polyoxyl 40 Hydrogenated Castor Oil, NF)

Two solubilizing excipients developed by BASF prior to the development of Solutol<sup>®</sup> HS-15

Polyoxyl 35 Castor Oil is in 8 FDA-approved drug products

Polyoxyl 40 Hydrogenated Castor Oil is in 7 FDA-approved drug products

In contrast to Cremophor<sup>®</sup>, Solutol<sup>®</sup> HS-15 is known to have less significant histamine release in animal toxicity studies. It is a non-ionic solubilizer and emulsifying agent composed of polyglycol mono- and di- esters of 12hydroxystearic acid (lipophilic part) and about 30% of free polyethylene glycol (hydrophilic part). Polyoxyl Stearates are used in about 35 FDAapproved drugs as seen from the FDA inactive ingredient database. Solutol<sup>®</sup> HS-15 - used in an injectable human drug, Oxidize<sup>®</sup> (Diclofenac sodium) manufactured by Beta S.A., Buenos Aires, Argentina. Solutol HS-15 has been used in Canada since 1989 in multivitamin injections in two injectable formulations, a 2 mg/mL formulation containing 7% Solutol HS-15, and a 10 mg/mL formulation containing 10% Solutol HS-15.

### Why Does a Pharmaceutical Company Take the Risk to Use a Novel Excipient?

Solutol HS-15 is classified as "new" excipient since it hasn't been used in the U.S. in any marketed product

JECFA established an Acceptable Daily Intake (ADI) for similar excipients, PEG-8-Stearate and PEG-40-Stearate. Solutol HS-15 is a PEG-15-HydroxyStearate and should have a very similar safety profile as the other PEG-Stearates.

While Solutol HS-15 does cause the release of histamine from mast cells, it is less allergenic than the closely related structure Cremophor approved by FDA.

### Collaboration Between Wyeth, BASF and IPEC

- In 2007, Jay Goldring (Wyeth Consumer) and the Chair of IPEC Safety Committee started a job rotation program in Wyeth Early Pharmaceutical Development.
- Dr. Sherry Ku approached several excipient suppliers for possible collaboration in the IPEC new excipient review process
- BASF took the challenge and agreed to collaborate and pay the Tox consultant fee.
- As the first excipient through the system, FDA agreed to review the package and reply with assessment.
- Dr. Goldring coordinated the information input, expert review, and review by FDA.

#### IPEC New Excipient Safety Evaluation Procedure - Solutol HS-15

- Aclairo independent toxicology consulting firm working under an IPEC agreement for novel excipient evaluation.
- BASF prepared a comprehensive preclinical package for Aclairo on Solutol<sup>®</sup> HS-15 that included:
  - Summary of CMC information
  - Toxicology reports oral and I.V.
    - Acute, subchronic, reproductive and genotoxicity
  - BASF's internal safety expert report
  - Safety evaluation assessment by EMEA
  - Information on Cremophor and other related excipients

Contributed Human Experience – Clinical Studies with Formulation containing Solutol HS-15

# Two (2) phase 1 studies were clinically completed in the United States

A single ascending dose (SAD) study conducted in healthy subjects and a multiple ascending dose (MAD) study conducted in healthy subjects.

In a Phase 2 POC study (6 weeks dosing), an endoscopic examination (7 days GI safety study) was performed at up to 5 capsules of the placebo.

No Adverse Events (AE) in 12 patients dosed.

Overall the AE profile from this study showed that a single oral dose of up to 10 capsules of the Wyeth formulation (containing 150 mg Solutol/capsule) are generally safe and well tolerated

#### IPEC Novel Excipient Safety Review-Review by Aclairo and FDA

Aclairo provided an independent safety evaluation report for Solutol HS-15.

IPEC Safety Committee Chair submitted Aclairo's report and all other documents submitted to Aclairo to the FDA for review for consistency with FDA's own review process.

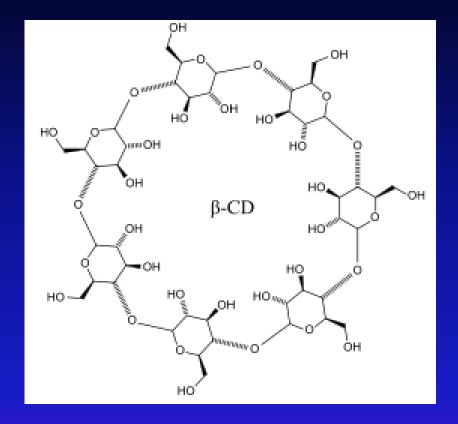
After receiving FDA feedback, BASF requested USP to consider a Solutol HS-15 monograph. USP consulted with FDA's Compendial group and published monograph in Jan/Feb 2009 issue of PF

New Technologies Can Drive the Introduction of New Excipients Hot Melt Extrusion (HME) Microprilled Poloxamer – BASF/Roche **Spray-Dried Solid Dispersions** HPMCAS – Shin-Etsu/Bend/Pfizer Need polymer levels higher than previous approved uses Excipient and pharma manufacturer work in partnership to put together the tox data package

### Case Study: Cyclodextrins

Solubilization of poorly soluble actives Taste-masking Stabilization

Natural parent Cyclodextrins: Alpha, beta, gamma: 6, 7, 8 glucose units



Parent CDs Approval First approved in Japan in 1983 as a food additive, and then as a pharmaceutical excipient Notification of GRAS status accepted by FDA JECFA ADI – alpha & gamma: "not specified" beta: 0 – 5 mg/kg bw (300 mg/60kg)

*not specified*: refers to a food substance of very low toxicity, which, based on the available data and the total dietary intake of the substance arising from its intended condition of use does not represent a hazard to health.

Alpha and Beta – USP/NF, Ph.Eur., JPE Gamma – USP/NF, Ph.Eur in process, not in JPE

Need for a Safe Parenteral CD Safer CD sought through chemical modification  $HP-\beta-CD$  – partially substituted poly(hydroxypropyl) ether of beta cyclodextrin improved solubility improved renal safety developed by Janssen as Encapsin<sup>®</sup> Sporanox<sup>®</sup> - oral solution and I.V. unexpected finding – pancreatic neoplasms limited use

#### Sulfobutylether-β-Cyclodextrin

Systematic approach to introduce anionic substituents onto  $\beta$ -CD to design renal safety into the molecule

- Developed by CyDex as Captisol®
- SBE sodium sulfonate salt separated from the lipohilic cavity by a butyl spacer group
- Degree of substitution : 7 (no unreacted  $\beta$ -CD)

Enhanced water solubility

CyDex worked with Pfizer to develop two products: Vfend<sup>®</sup> (voriconazole) I.V. and Geodon<sup>®</sup> (ziprasidone) I.M.

#### Sulfobutylether-β-Cyclodextrin

Extensive saftey studies

Especially renal function

Captisol<sup>®</sup> DMF – tox package for parenteral, ophthalmic, oral, nasal and inhalation administration

#### Listed in FDA IID:

- I.M. 44.14%
- I.V. 67.50%

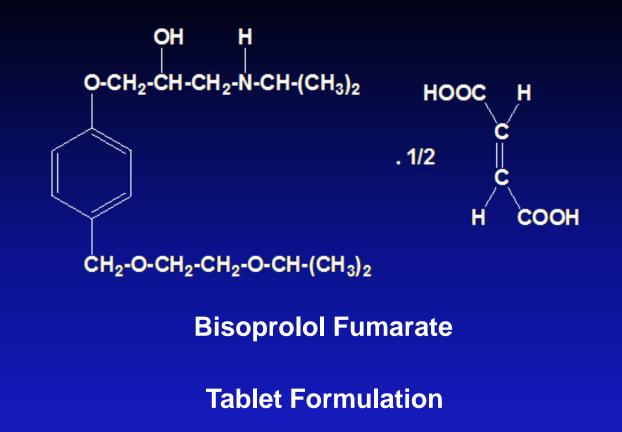
Stella & He Toxicologic Pathology, 2008, 36:30-42.

**Case Study: Calcium Phosphates** CaHPO<sub>4</sub>·H<sub>2</sub>O  $Ca_9(PO_4)_5(HPO_4)OH$ CaHPO<sub>4</sub>·2H<sub>2</sub>O  $CaHPO_4 \quad Ca_{10}(PO_4)_6(OH)_2$  $Ca_8H_2(PO4)_6(OH)_2 Ca_3(PO_4)_2$  $Ca(H_2PO_4)_2 H_2O$  $Ca_4(PO_4)_2O$ 

### **Dicalcium Phosphate**

Three types typically used in solid dosage forms: **Dibasic Calcium Phosphate Anhydrous Dibasic Calcium Phosphate Dihydrate Tribasic Calcium Phosphate** Available in powdered and granular form Dibasic Calcium Phosphate Dihydrate irreversibly gives off water above 40-45°C, and gives misleading stability predictions Formulators use Anhydrous to avoid potential or

real instability.



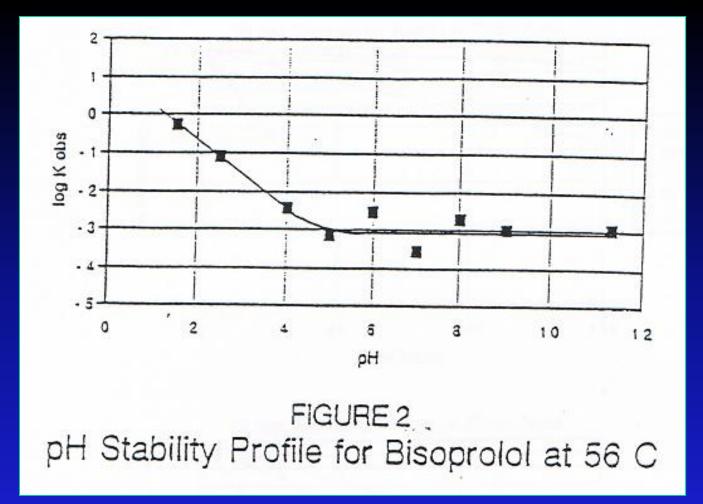
Anhydrous Dicalcium Phosphate USP  $\rightarrow$  Anhydrous Dicalcium Phosphate USP

Powdered stable

"NEW" Granular unstable

## **Non-USP Properties**

	Powdered DCPA	Granular DCPA
Particle size	Powder	Granular
Density (tapped)	~83 lb/ft <sup>3</sup>	~50 lb/ft <sup>3</sup>
pH 20% slurry	6.6 - 7.4	5.0 – 5.6
Surface area	0.5 – 2 m²/g	20 – 30 m²/g



Pretreating the Granular Dicalcium Phosphate to remove surface acidity  $\rightarrow$  product once again is stable

Dulin, W. Drug Dev Ind Pharm, 1995, 21(4), 393-409.

### **Calcium Phosphates and Bone**

Calcium Phosphate matrices have been tested for facilitating bone repair since 1920. In 1970s hydroxyapatites were used. In 1980s, calcium phosphates were introduced into the clinic.

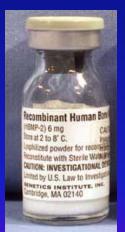
Chemistry, process and many functional properties (structure, crystal and particle size, specific surface area, and porosity) affect the ability of a calcium phosphate to perform as a bone cement.



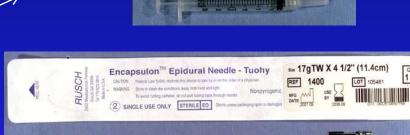
#### Calcium Phosphate Matrix (CPM) (Etex Corp)

Forms a paste easily injected by hand. Inject within 15 minutes from time of mix.









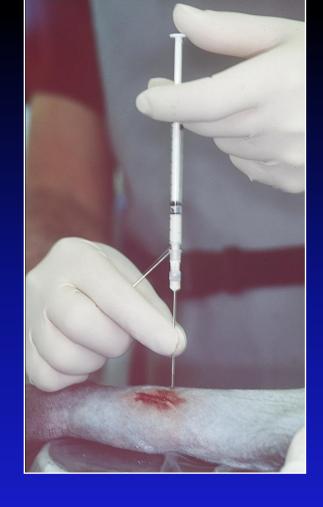
Recombinant Humanized Bone Morphogenic Protein-2 (rhBMP-2) (Wyeth Biopharma)

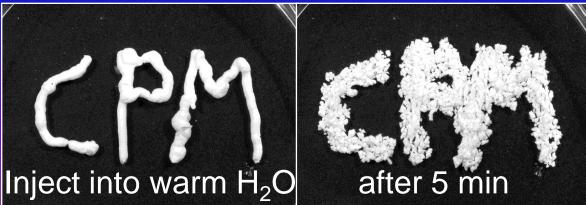
### CPM

- Endothermically-setting calcium phosphate paste with unique rhBMP-2 retention
- Formulated as an injectable biodegradable paste
- Specifically designed to particulate following administration

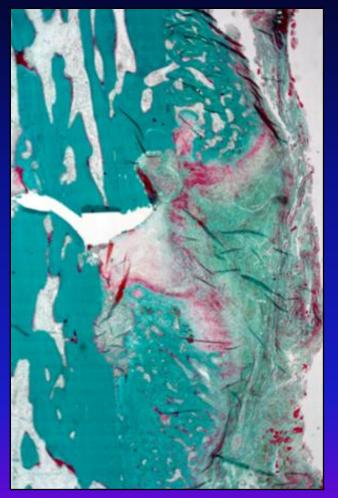
Amorphous Calcium Phosphate + Dicalcium Phosphate Dihydrate

Sodium Bicarbonate





### Histology: NHP fibula osteotomy (8 wks)



#### **Surgical Control**



rhBMP-2/CPM

# CASE STUDY

Partnering With Big-Pharma: Pfizer & CyDex's Positive Experience: A Case Study By: Contributor Guy Furness

#### Drug Delivery Technology, Jan 2006

