#### DRAFT CONSENSUS GUIDELINE

# GUIDELINE FOR ELEMENTAL IMPURITIES Q3D

Current *Step 2b* version dated 26 July 2013

At Step 2 of the ICH Process, a consensus draft text or Guideline, agreed by the appropriate ICH Expert Working Group, is transmitted by the ICH Steering Committee to the regulatory authorities of the three ICH regions (the European Union, Japan and the USA) for internal and external consultation, according to national or regional procedures.



## Q3D Document History

#### Current Step 2a version

Code	History	Date
Q3D	Approval by the Steering Committee under Step 2a.	6 June 2013

#### Current Step 2b version

Code	History	Date
Q3D	Approval by the Steering Committee under <i>Step 2b</i> and release for public consultation.	6 June 2013
Q3D	<ul> <li>Post sign-off corrigendum in:</li> <li>Table 4.1 W and Al were removed from the list of included elemental impurities in Class 2B and 3 respectively.</li> <li>Table A.2.1 the Class for Ni was changed to read 3 instead of 2.</li> </ul>	14 June 2013
Q3D	Post sign-off minor editorial corrections including: removal of references to Appendix 5 (pgs i & 13); deletion of redundant text (pg 4); change of Option 2 to Option 2a (pg 10); insertion of omitted text under Safety Limiting Toxicity (pg 35); removal of duplicated redundant text (pg 41); replacing references to "metals" in text and "metal" in Table A.4.7 title with "elementals" and "elements" (pg 73); and deletion of header Table A.4.10 (pg 75).	26 July 2013
Q3D	Addition of line numbers to facilitate the provision of comments by stakeholders.	30 September 2013

Legal notice: This document is protected by copyright and may be used, reproduced, incorporated into other works, adapted, modified, translated or distributed under a public license provided that ICH's copyright in the document is acknowledged at all times. In case of any adaption, modification or translation of the document, reasonable steps must be taken to clearly label, demarcate or otherwise identify that changes were made to or based on the original document. Any impression that the adaption, modification or translation of the original document is endorsed or sponsored by the ICH must be avoided.

The document is provided "as is" without warranty of any kind. In no event shall the ICH or the authors of the original document be liable for any claim, damages or other liability arising from the use of the document.

The above-mentioned permissions do not apply to content supplied by third parties. Therefore, for documents where the copyright vests in a third party, permission for reproduction must be obtained from this copyright holder.



# GUIDELINE FOR ELEMENTAL IMPURITIES

## **Draft ICH Consensus Guideline**

Released for Consultation on 26 July 2013, at Step 2b of the ICH Process

## TABLE OF CONTENTS

1.	INTRODUCTION	1
2.	SCOPE	1
3.	SAFETY ASSESSMENT OF POTENTIAL ELEMENTAL IMPURITIES	2
3.1	Principles of the Safety Assessment of Elemental Impurities for Oral, Parenteral and Inhalation Routes of Administration	2
3.2	Other Routes of Administration	
3.3	Justification for Element Impurity Levels Higher than the PDE	
3.4	Parenteral Products	
4.	ELEMENT CLASSIFICATION	4
<b>5.</b>	ASSESSMENT AND CONTROL OF ELEMENTAL IMPURITIES	5
5.1	General Principles	5
5.2	Potential Sources of Elemental Impurities	
5.3	Assessment – Identification of Potential Elemental Impurities	7
5.4	Assessment – Analysis and Evaluation	9
5.5	Converting Between PDEs and Concentration Limits	9
5.6	Assessment Summary	
5.7	Control of Elemental Impurities	
5.8	Periodic Verification Testing	
5.9	Special Considerations for Biotechnologically-Derived Products	
6.	SPECIATION	
7.	ANALYTICAL PROCEDURES	.14
8.	LIFE-CYCLE MANAGEMENT OF THE CONTROL STRATEGY FOR ELEMENTAL IMPURITIES	.14
9.	RECOMMENDATIONS FOR SUBMISSION OF ELEMENTAL IMPURITIES CONTROL STRATEGY.	
Dee		
	TERENCES	
	OSSARY	
App	endix 1: Method for Establishing Exposure Limits	.20
App	endix 2: Established PDEs for Elemental Impurities	.23
App	endix 3: Individual Safety Assessments	.25
	pendix 4: Illustrative Example – Calculation Options for Converting PDEs to acentrations	





### GUIDELINE FOR ELEMENTAL IMPURITIES

 $\mathbf{Q3D}$ 

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17 18

19

20

21

22

23

33

34

35

36

37

38

39

1

#### 1. Introduction

Elemental impurities in drug products may arise from several sources; they may be added intentionally in synthesis, or may be present as contaminants (e.g., through interactions with processing equipment or by being present in components of the drug product) and are consequently detectable in the drug product. Since elemental impurities do not provide any therapeutic benefit to the patient, element impurity levels should be controlled within acceptable limits in the drug product. There are three components of this guideline: the evaluation of the toxicity data for potential elemental impurities, the establishment of a Permitted Daily Exposure (PDE) for each element of toxicological concern, and development of controls designed to limit the inclusion of elemental impurities in drug products to levels at or below the PDE. It is not expected that an applicant tightens the limits based on process capability provided that the elemental impurities in drug products are held at or below the PDE. The PDEs established in this guideline are considered to be protective of public health for all patient populations, including pediatric patients. In some cases, lower levels of elemental impurities may be needed when levels below toxicity thresholds have been shown to have an impact on other quality attributes of the drug product (e.g., element catalyzed degradation of drug substances). In addition, in the case of high PDEs, other limits may have to be considered from a pharmaceutical quality perspective; other guidelines should be consulted.

- Developing a strategy to limit elemental impurities in the drug product is consistent with risk management processes identified in ICH Q9. The process is described in this guideline as a four step process to assess and control elemental impurities in the drug product: identify, analyse, evaluate, and control.
- The PDE of the elements may change if new safety data become available. The guideline may be updated to include other elemental impurities or other routes of administration as new data become available. Any interested party can make a request and submit the relevant safety data to be considered.

#### 32 **2. SCOPE**

- The PDEs in this guideline have been established based on acceptable safety limits of potentially toxic elemental impurities. The guideline applies to new finished drug products (as defined in ICH Q6A and Q6B) and new drug products employing existing drug substances. The drug products containing: proteins and polypeptides (produced from recombinant or non-recombinant cell-culture expression systems), their derivatives, and products of which they are components (e.g., conjugates) are in the scope of this guideline. In addition, drug products containing synthetically produced polypeptides, polynucleotides, and oligosaccharides are within scope of this guideline.
- polynucleotides, and oligosaccharides are within scope of this guideline.

  This guideline does not apply to herbal products, radiopharmaceuticals, vaccines, cell metabolites, DNA products, allergenic extracts, cells, whole blood, cellular blood components, crude products of animal or plant origin, dialysate solutions not intended for systemic circulation or drug products containing elements that are intentionally included for therapeutic benefit.



# DOCKET

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

# **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

# **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

#### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

### **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

