The European Agency for the Evaluation of Medicinal Products
Evaluation of Medicines for Human Use

London, 20 February 2003
CPMP/QWP/419/03

COMMITTEE FOR PROPRIETARY MEDICINAL PRODUCTS (CPMP)

<DRAFT>

NOTE FOR GUIDANCE ON EXCIPIENTS, ANTIOXIDANTS AND ANTIMICROBIAL PRESERVATIVES IN THE DOSSIER FOR APPLICATION FOR MARKETING AUTHORISATION OF A MEDICINAL PRODUCT

DISCUSSION IN THE QUALITY WORKING PARTY	April 2002, January 2003
TRANSMISSION TO CPMP	February 2003
RELEASE FOR CONSULTATION	February 2003
DEADLINE FOR COMMENTS	August 2003

Note:
This Note for Guidance replaces 3AQ9a Excipients in the Dossier for Application for Marketing Authorisation of a Medicinal Products and CPMP/CVMP/QWP/115/95 Note for Guidance on Inclusion of Antioxidants and Antimicrobial Preservatives in Medicinal Products

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NOTE FOR GUIDANCE ON EXCIPIENTS, ANTIOXIDANTS AND ANTIMICROBIAL PRESERVATIVES IN THE DOSSIER FOR APPLICATION FOR MARKETING AUTHORISATION OF A MEDICINAL PRODUCT

INTRODUCTION

This note for guidance is concerned with the application to excipients, antioxidants and antimicrobial preservatives of Module 3, sections P.1, P.2, P.4, P.5, P.8 of the Common Technical Document with a view to granting a marketing authorisation for a new medicinal product.

The data should be presented according to the standard format described in the CTD Module 3, part P.

Antioxidants and Antimicrobial Preservatives are substances which are used to extend the shelf-life of medicines by respectively retarding the oxidation of active substances and excipients, and by reducing microbial proliferation.

The properties of these substances are due to certain chemical groups which are usually aggressive towards living cells and which lead to certain risks when used in man.

If it is not absolutely necessary to add these substances in medicinal products they must be avoided.

The purpose of this note for guidance is to describe the information that needs to appear in application for marketing authorisations with regards to the addition of any antioxidants or antimicrobial preservatives.

For each antioxidants and antimicrobial preservative the application should contain :

- reason for inclusion
- proof of efficacy
- the method of control in finished product
- details of the labelling of the finished product
- safety information

Several guidelines should be also taken into account :

- ICH Topic Q 6 A : Specifications : Test Procedures and Acceptance Criteria for New Drug Substances and New Drug Products : Chemical Substances (3.3.2.2. Oral liquids : d) Antimicrobial preservative content, e) Antioxidants preservative content ; 3.3.2.3. Parenteral Drug Products : g) h) and Decision Tree 8 : Microbiological Attributes of Non-sterile drug products).
- Note for Guidance on Development Pharmaceutics : 3.3. Liquid and Semi-solid Formulations.
- 3BC7A : Excipients in the Label and Package leaflet of Medicinal Products for Human Use
- Note for guidance on maximum shelf-life for sterile products after first opening or following reconstitution.

SECTION P.1 Description and Composition of the Drug Product

Excipients must be listed, specifying their common name, their quantity and the use and reference to any relevant standard. When the common name is not sufficient to indicate functional specifications, the brand name with commercial grade should be specified. In the case of excipients presented as a mixture of compounds, details as to the composition should be provided in qualitative and quantitative terms. However, for flavouring agents and aromatic substances, it is permitted to give the qualitative composition only.

Antimicrobial preservatives and antioxidants should be chemically defined (reference to existing European Pharmacopoeia monographs may be used) and designated by the Chemical Abstract Service Registry Number (RN-CAS).

The purpose for the inclusion of any antioxidant or microbial preservative should be stated (antioxidant for the benefit of active substance or excipient or both, or antimicrobial preservative).

SECTION P.2 Pharmaceutical development

SECTION P.2.1 Components of the Drug Product

The section P.2.1.2 should comprise an explanation of the choice of the excipient (and grade where necessary) and the level of excipient according to the note for guidance "Development pharmaceutics and process validation".

For antimicrobial preservatives and antioxidants, during the pharmaceutical development of the product the applicant should demonstrate:

- the necessity to add an antioxidant or preservative to the finished product at the chosen level
- the physical and chemical compatibility of the antioxidant and of the preservative with other constituents of the finished product, the container and the closures.

The used concentration must be justified in terms of efficacy and safety, such that the minimum concentration of preservative is used which gives the required level of efficacy. The appropriate test method for efficacy of antimicrobial preservation is that of the European Pharmacopoeia. This should be used to determine whether the required level of activity is achieved.

In the case of antioxidants, these should only be used once it has been shown that their use cannot be avoided, even if the manufacturing process is optimised to minimise the potential for oxidation, for instance by manufacturing and filling products under an inert headspace gas.

The safety of the antioxidant or preservative should be supported by bibliographic and /or experimental data.

Some antioxidants or antimicrobial preservatives may be undesirable under certain circumstances :

- mercury containing preservatives : see the CPMP Position Paper on Thiomersal, Implementation of the Warning Statement Relating to Sensitisation (CPMP/2612/99) and EMEA Position Statement on recent developments concerning thiomersal in vaccines (EMEA/CPMP/1578/00). This kind of preservative should be strictly avoided except if no other possibility may be considered but in this case the choice should be fully justified.

- benzyl alcohol : when used in parenteral products for children under the age of two years. Its degradation product and metabolite is the benzaldehyde, toxic for the CNS.
- Benzoic acid esters (Para hydroxy benzoate and their derivates etc) : when used in any dosage-form for parenteral use.
- Sulphites and Metabisulphites.

Parenteral infusions do not contain any added antimicrobial preservatives and no antimicrobial preservatives are added when the medicinal product is intended for administration by routes where for medical reasons an antimicrobial preservative is unacceptable, such as intercisternally or by any other route of administration which gives access to the cerebrospinal fluid or retro-ocularly.

SECTION P.4 Control of Excipients

Examples of different kinds of excipients are given in the annex.

1. Specifications (P.4.1), Analytical Procedures (P.4.2), Validation of Analytical Procedures (P.4.3) and Justification of Specifications (P.4.4) :

1.1 Excipients described in the European Pharmacopoeia or, if not described in the European Pharmacopoeia, pharmacopoeia of a Member State

The routine tests which are to be carried out on each batch of starting materials must be stated in the application for marketing authorisation. If tests other than those mentioned in the pharmacopoeia are used, proof must be supplied that the test methods used are suitable to establish that the starting materials meet the quality requirements of that pharmacopoeia. When the monograph covers a family of related products, the particular specifications chosen for the excipients must be submitted. In addition and when necessary, the test used to determine the quality of the excipient should be shown to be in relation to the function that it fulfils in the medicinal product.

Data on microbiological contamination of the excipients used in the manufacture of sterile products should always be given where membrane filtration is used to achieve sterility.

Antimicrobial preservatives and antioxidants are defined as excipients and as such should be controlled following the rules governing medicinal products in the European Union. These data should be provided in part P.4.

1.2 Excipients not described in the European Pharmacopoeia or in the pharmacopoeia of a Member State

An appropriate specification of the excipient must be established, based on the following types of tests:

* Physical characteristics
* Identification tests
* Purity tests, including limits for total or individual impurities, which should be named. Purity tests may be physical, chemical, biological and, if appropriate, immunological.

  Where sterile filtration is used in the manufacture of a parental medicinal product, data and routine tests on microbiological contamination of excipients should always be given.
* Other relevant tests including, e.g. the tests on parameters which may influence the performance of the dosage form.

* Assay or limit tests if necessary.

When an excipient is not described in the European Pharmacopoeia or in the pharmacopoeia of a Member State or in an other compendium of established use (e.g. USNF Pharmacopoeia and Japanese Pharmacopoeia), validation data of the test methods used should be presented, where appropriate.

1.3 Justification of Specifications

Justifications of specifications takes into account the choice and use of an excipient which is used for a particular purpose: it will determine the properties which must be checked during the routine tests and which will be the subject of certain specifications in connection with the bioavailability of the product (see Note for Guidance "Specifications and control tests on the finished product").

Nevertheless, justification of specifications are not systematically required for well-known excipients. For example, they are not required for excipients which have been used in similar medicinal products for a long period of time and when their characteristics and properties have not changed significantly.

For solid and semi-solid dosage forms, the justification of specifications should, if necessary, provide information on the relevant characteristics of the excipient. Special tests are often necessary (e.g. to verify the capacity of the excipient to emulsify and disperse, or to measure the viscosity...).

Appropriate data are needed for excipients used in a new route of administration.

Justification of specifications on excipients already included in the European Pharmacopoeia, or if not included in the European Pharmacopoeia, in the pharmacopoeia of a Member State and other well-known excipients already used in a medicinal product.

For these excipients, justification of specifications will normally not be required. However, any particular specification concerning the characteristics, as defined in Section P.2.1.2, should be justified (e.g. sieve analysis, in relation to microcrystallinity).

Excipients of Human or Animal Origin (P.4.5)

Viral Safety and TSE Risk should be documented in accordance with the relevant directives.

Novel Excipients (P.4.6)

For novel excipients : a dossier should be established containing the same data as required for new active substances:

a) A strict definition of the excipient, its function and its conditions of use. If the excipient is complex or is made of a mixture of compounds, the composition must be specified in qualitative and quantitative terms.

b) For new excipients and for excipients presented as a mixture of compounds the following should be taken into consideration:

   i. Any bibliographical data on the chemistry and on the toxicology and the field in which the product is already used.

   ii. The Community provisions concerning additives in foodstuff: any criteria which are based on the toxicological data, with cross-references to these data.

   The quality specifications which have been laid down in the directives are satisfactory as long as the routine control tests used are validated.

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