Chair’s Note:

Looks like a long hot summer has settled in at least across Atlanta where the humidity is so thick that the air pushes back as you attempt to leave the comfort of air-conditioning. I hope everyone finds the time to relax and experience life this summer or at least work with a tall cold drink in hand. IPEC teams continue to hold teleconferences over the summer. The IPEC Federation held a very productive face-to-face meeting in Cincinnati during June. We completed the banking structure for hosting EXCIPIACT during their start up. We solidified our relationship with the PDG and agreed to continue meetings to work on harmonization of excipient monographs. We also shared the challenges of each PEC and the global issues from each region.

Given the current global nature of excipient manufacturing and distribution, these conversations help each PEC build an organization that can support its member companies. Continue to stay safe this summer and spend as much time as possible in your favorite place with your tall cold beverage of choice.
IPEC Federation Board Meets in Cincinnati

On June 13–15, in conjunction with the regularly scheduled semi-annual International Conference on Harmonization meetings that rotate among Europe, Japan, and the United States, IPEC Federation Board members met in Cincinnati, Ohio. In addition to working to resolve issues affecting IPEC Federation members on a global basis, the Board also met with the Pharmacopeial Discussion Group (PDG) to review progress in their ongoing monograph harmonization efforts which now include recognition of additives and handling of elemental impurities.

During the PDG meeting, IPEC noted that it plans to work with an industry coalition to collect data relating to elemental impurities in order for it to be considered in Stage 2 ICH Q3D meetings planned for November 2011.

It remains IPEC’s position that based on data currently available, an official timeline for implementation of impurity limits should not be established because of the likelihood of market disruption due to unavailability of key ingredients in formulations.

Full reports of these and other matters discussed during the Cincinnati meetings are being provided to members of involved IPEC–Americas Committees for their assistance and further advice.

PDG Press Release: Pharmacopoeial Discussion Group Achievements

Cincinnati, Ohio, USA 14-15 June 2011


At present, 28 of the 35 General Chapters and 41 of the 62 excipient monographs of the current work programme have been harmonised. The General Chapter for Microcalorimetry is newly harmonised.

Revised General Chapters include Bacterial Endotoxins and Bulk and Tapped Density. Excipient sign-offs include revisions to Benzyl Alcohol, Potato Starch, Wheat Starch, Calcium Phosphate Dibasic,
and \textit{Calcium Phosphate Dibasic Anhydrous} monographs. The latter four revisions are the outcome of PDG’s review of previously harmonised excipient monographs.

\textbf{Other Topics}

The three pharmacopoeias discussed other topics, including microbiological limits, additives in excipients, and metal impurities. Also, PDG decided to add the Isomalt monographs to its work programme.

\textbf{Excipients Council}

A meeting with the International Pharmaceutical Excipients Council (IPEC) Federation was held on June 14, 2011.

\textbf{Future of PDG}

The three Pharmacopoeias emphasized their commitment to further strengthen international harmonisation. PDG will utilise its monthly teleconferences for discussion of technical topics in addition to monitoring status updates. The next face-to-face PDG meeting will be hosted by EDQM on November 8–9, 2011 in Strasbourg, France.

\textbf{Phthalate Update}

\textit{The following update information was compiled by Rick Green of CP Kelco/Huber Engineered Materials and David Schoneker of Colorcon. It also will be posted on IPEC-Americas website for wider dissemination.}

There are many phthalates which are approved for use in pharmaceuticals such as Di-Ethyl Phthalate (DEP) and Di-Butyl Phthalate (DBP). These phthalates can be legally used in drug applications in many countries and they do not pose safety concerns in these applications.

There has also been some confusion within the industry, academic and regulatory communities in Asia regarding the use of the terms “plasticizer” vs. “phthalates”. There are many different kinds of plasticizers that are not phthalates which are commonly used in food and pharmaceutical applications and not only in the Chinese Pharmacopeia but are also listed in the USP–NF, FDA Inactive Ingredient Database and used in approved drug products here in the U.S. However, there is growing concern about some movements in China which could potentially impact the use of these safe substances.
they have been shown to be safe for this intended purpose by scientific studies. As mentioned above, there are also some phthalate plasticizers (such as DEP and DBP) which have been used and shown to be safe for use in oral pharmaceutical applications. The media has been using the terms “plasticizer” and “phthalate” interchangeably in certain news articles and this is incorrect. The recent incidents in Taiwan were related to the specific phthalate plasticizers, DEHP and DINP, not plasticizers in general.

IPEC members who supply excipients are receiving requests from customers sometimes listing over 20 types of phthalates as undesirable, even ones already approved for various drug uses. There doesn't appear to be a scientifically sound reason for concerns with many of these phthalates and IPEC believes that users and regulators should focus their questions on the phthalates which actually may have some risk associated with them as opposed to just investigating all types of phthalates, most of which have not been involved in the recent incidents. IPEC believes that the use of any excipient should be based on a sound scientific assessment of safety and suitability for the intended use. Additionally all suppliers and supply chains should be qualified by users before using an excipient to verify the integrity of that supplier and supply chain and to determine what risks may exist for potential adulteration.

FDA recently published a Notification titled: "FDA Notification to Industry Regarding Potential Adulteration of Pharmaceutical Ingredients used as Emulsifying Agents and Flavorings" which outlines FDA's concerns related to the Taiwan contamination incident. This notification can be accessed at the following website: http://www.fda.gov/Drugs/DrugSafety/ucm259844.htm

FDA makes a few recommendations in this notification on actions that should be taken by Pharmaceutical Manufacturers and they state that "Manufacturers, pharmacy compounders, and distributors should determine if their supply chain is at risk."

To try to get alignment throughout the industry on the Taiwan phthalate issue, IPEC plans to coordinate an industry coalition of trade associations from the maker and user community to address communication and develop value-added actions to help control the efforts that everyone is making to deal with this difficult developing issue. It is important that everyone knows the actual facts as they are discovered so that appropriate actions can take place which truly impact patient safety and do not just result in a paperwork exercise with little benefit.
Press Announcement> FDA unveils New Global Strategy to Help Ensure Safety and Quality of Imported Products

As announced by the U.S. Food and Drug Administration on June 20 and passed on to IPEC–Americas member company official representatives, “a new strategy to meet the challenges posed by rapidly rising imports of FDA–regulated products and a complex global supply chain” has been outlined in a report named

“Pathway To Global Product Safety and Quality”

Which is available online at: [http://www.fda.gov/globalproductpathway](http://www.fda.gov/globalproductpathway)

Four key elements are needed to make the strategy effective:

1. “global coalitions of regulators focused on ensuring and improving global product safety and quality”;
2. development of “international data information systems and networks” and “sharing data and regulatory resources across world markets” by regulators;
3. “additional information gathering and analyzers capabilities” within FDA “with an increased focus on risk analytics and information technology;” and
4. “The FDA increasingly will leverage the efforts of public and private third parties and industry and allocate FDA resources based on risk.”

To review the announcement in its entirety go to:
[http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm259848.htm](http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm259848.htm)

FDA Statement of Organizations, Functions, and Delegations of Authority

Published June 24

FDA is announcing that it has reorganized the Center for Drug Evaluation and Research (CDER), Office of Compliance. This reorganization includes the organizations and substructure components as listed in this document. This document is announcing availability of the Staff Manual Guide that explains the details of this reorganization which includes establishing four Offices and their substructures under the Office of Compliance: Office of Drug Security, Integrity and Recalls (ODSIR), Office of Unapproved Drugs and Labeling Compliance (OUDLC), Office of Manufacturing and Product Quality (OMPQ), and Office of Scientific Investigations (OSI).

- ODSIR will consist of the Division of Import Operations and Recalls and the Division of Supply Chain Integrity.
- OUDLC will consist of the Division of Prescription Drugs and the Division of Non-Prescription Drugs and Health Fraud.
- OMPQ will consist of the Division of International Drug Quality, the Division of Domestic Drug Quality, the Division of Policy, Collaboration and Data Operations, and the Division of GMP Assessment.
- OSI will consist of the Division of Bioequivalence and Good Laboratory Practice Compliance, the Division of Good Clinical Practice Compliance, and the Division of Safety Compliance.
- The Division of Compliance Risk Management is abolished.

FDA Guidance Documents Update

This information has recently been updated and is now available. [http://www.fda.gov/RegulatoryInformation/Guidances/ucm122047.htm](http://www.fda.gov/RegulatoryInformation/Guidances/ucm122047.htm)

Links to new draft guidance documents:

Classification of Products as Drugs and Devices and Additional Product Classification Issues [http://www.fda.gov/RegulatoryInformation/Guidances/ucm258946.htm](http://www.fda.gov/RegulatoryInformation/Guidances/ucm258946.htm)


CONVENTION

USP Officers and Trustees /Appoint Four New Trustees
At its May meeting, the Board of Trustees appointed four new trustees to serve until 2015. Two of the new trustees will replace two resigning Board members, At–Large Trustee Frank J. Sasinowski, M.S., M.P.H., J.D. and Medicinal Sciences Trustee Lisa A. Cooper, M.D., M.P.H., who resigned from the Board in April for personal reasons. The Board appointed two additional trustees to provide leadership in newly evolving areas for the organization. The Bylaws give the Board authority to fill vacancies and add up to three At–Large Trustees during the cycle. It is, therefore, our pleasure to introduce USP’s four newest Trustees:

Medical Sciences Trustee
Michael D. Maves, M.D., M.B.A., Executive Vice President and CEO of the American Medical Association and a speaker at the 2010 Convention

At–Large Trustees
Robert L. Buchan, Ph.D., Professor and Director, Center for Food Safety and Security Systems, University of Maryland

Thomas E. Menighan, B.S.Pharm, M.B.A., Sc.D., FAPhA, Executive Vice President and CEO of the American Pharmacist Association

Jeffrey L. Sturchio, Ph.D., President and CEO of the Global Health Council

Eurand Becomes Aptalis Pharmaceutical Technologies

Last month, following the acquisition of IPEC–Americas member Eurand N.V. by Axcan Intermediate Holdings Inc., a new company was born, Aptalis Pharmaceutical Technologies! According to its President, Mr. John Fraher, and as reported in the June issue of Drug Development & Delivery magazine, Aptalis “.... will
continue to develop and manufacture products for its partners, as well as support the drug development process for The Aptalis Pharma pipeline and portfolio of oral drug delivery technology platforms: Customized Drug Release, Bioavailability Enhancement, and Taste–Masking for ODTs (orally disintegrating tablets) and other dosage forms.”

SAFYBI Translation of the IPEC-PQG GMP Guide Approved for Publication

As the result of an August 2010 agreement between the Argentine Association of Industrial Pharmacy and Biochemistry (SAFYBI) and the three organization’s which published the guidance in 2006, a Spanish language translation of the IPEC–PQG GMP Guide for Pharmaceutical Excipients has been approved for publication and use by companies and regulators in Argentina! This is just the first of several planned Spanish translation and implementation of IPEC guidance by SAFYBI for use in Argentina and other Spanish–speaking countries throughout Latin America, according to SAFYBI association authorities. Presently the IPEC Good Distribution Practices Guide also is undergoing translation and both the IPEC–PQG GMP Audit Guide and IPEC GDP auditing guidance also are reported under consideration for translation.

Member Alert Regarding Upcoming PQRI Workshop on Sample Sizes

Noted below among the list of future industry meetings, the September 12–13 PQRI Workshop on Sample Sizes for Decision Making in New Manufacturing Paradigms is likely to be of particular interest to IPEC–Americas members and particularly contract manufacturers and suppliers of finished pharmaceutical products. This is because of the Scope and Objectives of the Workshop, its co–sponsors, speakers and topics to be covered. According to the program available on the PQRI website at www.pqri.org

“The ability of pharmaceutical manufacturers to deliver quality product to the market place has become increasingly important. Technological advancements have made it possible to collect
significantly larger amounts of data, but it is not always clear how to convert this data into statistically relevant information to enable decision making throughout the lifecycle of the product. The purpose of this workshop is to:

1. Clarify the roles and expectations of USP/EP and Regulatory Agencies with respect to statistical differences between acceptance criteria and process controls;

2. share approaches used to date to deal with large sample sizes;

3. discuss how information gained from larger sample sizes can be used to make better decisions during development and release of pharmaceutical products; and

4. identify technical gaps or other challenges that prevent further progress for routine implementation.

While clearly a portion of this workshop will deal with statistical approaches, the material is intended to be understood by non-statistical workshop participants.”

Very Interesting!

IPEA Workshops

Register Early! This popular workshop offers participants training in the assessment of excipient manufacturer conformance to appropriate GMP requirements. The workshop contains exercises to hone observation skills, including participation in a hands-on mock excipient GMP audit.

3 Day Excipient Auditing Workshop in Arlington, VA (DC Metropolitan area) October 25–27, 2011
About the Xavier Conference:

- Co-Sponsored by the FDA
- Bringing pharma (i.e., pharma, biotech, generics, OTC) together with contract organizations to not only address the dysfunction in contract relationships, but also to identify what can be done together to increase overall patient safety – including supply chain security.
- The October agenda has a heavy focus on suppliers, but also provides an understanding of how to conduct effective audits that meet FDA and Global expectations.

For information on the Xavier Conference, including conference registration go to: [http://medxu.com/goc/](http://medxu.com/goc/) or contact Sue Bensman at 513–745–3396 (Bensman@xavier.edu)

**Important Industry Meetings**

**July 31–August 5**

43rd Annual IUPAC World Chemistry Conference organized by the Colegio de Quimicos de Puerto Rico
Puerto Rico Convention Center
San Juan, Puerto Rico
August 1–5

51st Annual Land O’Lakes Pharmaceutical Analysis Conference
“Challenges for the Analytical Laboratory: Today and tomorrow”
Devils Head Resort and Conference Center
Merrimac, Wisconsin
Register: http://ce.pharmacy.wisc.edu/courseinfo/2011AugustLOL

August 8–10

16th Annual GMP By The Sea
Grand Hyatt Hotel
Tampa Bay, Florida
Register: www.pharmaconference.com

August 17–18

Extension Services in Pharmacy (ESP) School of Pharmacy
The Role of CMC Quality in Ensuring Patient Safety: From Development through Commercialization
Hilton Washington, D.C./Rockville Hotel
Rockville, Maryland
Register: http://cepharmacy.wisc.edu/courseinfo/2011safety

September 12–13

PQRI Workshop on Sample Sizes for Decision Making in New Manufacturing Paradigms
Co-sponsored by AAPS, IQ Consortium, FDA, IFPAC, and ASTM
Hyatt Regency Bethesda
Bethesda, Maryland
Register: http://www.signmeup.com/7591 and additional information is available at www.pqri.org

September 12–14

2nd Annual West Coast Forum on Supplier Audits
“Ensure Compliance through Proper Risk Assessment, Supplier Qualification and Audit Programs”
Sponsored by Institute of Validation Technology
San Diego, California
September 19–21

2011 PDA/FDA Joint Regulatory Conference & TRI Courses
Quality and Compliance in Today’s Regulatory Enforcement Environment
Renaissance Hotel
Washington, D.C.
Register: www.pda.org/pdafda2011

September 20–21

IPA’s 7th Annual: GMP Update 2011
Global Perspectives for Pharmaceutical, Biopharmaceutical and Allied Industries
Montreal, Canada
Register: http://www.ipacanada.com/viewcourse.php?id=gmp0911mon

October 6–7

CHPA’s 2011 OTC Product Quality & Operations Workshop
Hyatt Regency Bethesda
Bethesda, Maryland
Register: www.chpa-info.org