# FDA Briefing Document

# Pharmacy Compounding Advisory Committee (PCAC) Meeting

# December 4, 2024

The briefing packages for CJC-1295-related bulk drug substances (CJC-1295 (free base), CJC-1295 acetate, CJC-1295 with drug affinity complex (DAC) (free base), CJC-1295 DAC acetate, and CJC-1295 DAC trifluoroacetate), AOD-9604-related bulk drug substances (AOD-9604 (free base) and AOD-9604 acetate), and Thymosin alpha-1-related bulk drug substances (Thymosin alpha-1 (free base) and Thymosin alpha-1 acetate) topics contain background information prepared by the Food and Drug Administration (FDA or Agency) for the panel members of the Pharmacy Compounding Advisory Committee (advisory committee). We are bringing certain compounding issues to this advisory committee to obtain the advisory committee's advice. The background package may not include all issues relevant to the final committee recommendation and instead is intended to focus on issues identified by the Agency for discussion by the advisory committee. The FDA will not issue a final determination on the issues at hand until input from the advisory committee process has been considered and all reviews have been finalized. The final determination may be affected by issues not discussed at the advisory committee meeting.

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# I. Introduction

Section 503A of the Federal Food, Drug, and Cosmetic Act (FD&C Act) describes the conditions that must be satisfied for human drug products compounded by a licensed pharmacist in a State-licensed Pharmacy or Federal facility, or by a licensed physician, to be exempt from the following three sections of the FD&C Act: section 505 (concerning the approval of drugs under new drug applications (NDAs) or abbreviated new drug applications (ANDAs)); section 502(f)(1) (concerning the labeling of drugs with adequate directions for use); and section 501(a)(2)(B) (concerning current good manufacturing practice (CGMP) requirements).

## A. Bulk Drug Substances That Can Be Used by Compounders under Section 503A

One of the conditions that must be met for a compounded drug product to qualify for the exemptions in section 503A of the FD&C Act is that a licensed pharmacist or licensed physician compounds the drug product using bulk drug substances that:

(1) Comply with the standards of an applicable United States Pharmacopeia (USP) or National Formulary (NF) monograph, if a monograph exists, and the USP chapter on pharmacy compounding;
(2) If such a monograph does not exist, are drug substances that are components of drugs approved by the Secretary; or
(3) If such a monograph does not exist and the drug substances are not components of drugs approved by the Secretary, appear on a list developed by the Secretary through regulations issued by the Secretary under subsections (c) of section 503A (the 503A Bulks List).

(*See* section 503A(b)(1)(A)(i) of the FD&C Act.)

### 1. *Process for Evaluating Bulk Drug Substances Nominated for Inclusion on the 503A Bulks List*

FDA is considering substances for inclusion on the 503A Bulks List. In the *Federal Register* of February 19, 2019 (84 FR 4696), FDA published notice of a final rule establishing the criteria for evaluation of bulk drug substances for inclusion on the 503A Bulks List:

(1) The physical and chemical characterization of the substance;
(2) Any safety issues raised by the use of the substance in compounded drug products;
(3) The available evidence of the effectiveness or lack of effectiveness of a drug product compounded with the substance, if any such evidence exists; and
(4) Historical use of the substance in compounded drug products, including information about the medical condition(s) the substance has been used to treat and any references in peer-reviewed medical literature.

In evaluating bulk drug substances for the 503A Bulks List under these criteria, FDA will use a balancing test. Specifically, the Agency will consider each criterion in the context of the others

and balance them, on a substance-by substance basis, to evaluate whether a particular substance is appropriate for inclusion on the list.

### 2. *Bulk Drug Substances Under Evaluation for Inclusion on the 503A Bulks List*

The Agency is considering CJC-1295-related bulk drug substances (CJC-1295 (free base), CJC-1295 acetate, CJC-1295 with drug affinity complex (DAC) (free base), CJC-1295 DAC acetate, and CJC-1295 DAC trifluoroacetate), AOD-9604-related bulk drug substances (AOD-9604 (free base) and AOD-9604 acetate), and thymosin alpha-1-related bulk drug substances (thymosin alpha-1 (free base) and thymosin alpha-1 acetate) for inclusion on the 503A Bulks List. See links provided for the background material that forms the basis for FDA's proposals regarding these bulk drug substances.

# II. Substances Nominated for Inclusion on the 503A Bulks List (in order of discussion at the meeting)

## A. CJC-1295-related bulk drug substances (CJC-1295 (free base), CJC-1295 acetate, CJC-1295 DAC (free base), CJC-1295 DAC acetate, and CJC-1295 DAC trifluoroacetate)

1. FDA Evaluation

2. Nominations
   a. LDT Health Solutions, Inc. on behalf of International Peptide Society[1]
   b. Wells Pharmacy Network[2]

## B. AOD-9604-related bulk drug substances (AOD-9604 (free base) and AOD-9604 acetate)

1. FDA Evaluation

2. Nominations
   a. LDT Health Solutions, Inc. on behalf of International Peptide Society[3]

[1] This nomination was withdrawn by the nominator (FDA-2015-N-3534-0472). However, FDA is electing to proceed with the presentation of CJC-1295-related bulk drug substances (CJC-1295 (free base), CJC-1295 acetate, CJC-1295 DAC (free base), CJC-1295 DAC acetate, and CJC-1295 DAC trifluoroacetate) to the PCAC.
[2] This nomination was withdrawn by the nominator (FDA-2015-N-3534-0470). However, FDA is electing to proceed with the presentation of CJC-1295-related bulk drug substances (CJC-1295 (free base), CJC-1295 acetate, CJC-1295 DAC (free base), CJC-1295 DAC acetate, and CJC-1295 DAC trifluoroacetate) to the PCAC.
[3] This nomination was withdrawn by the nominator (FDA-2015-N-3534-0472). However, FDA is electing to

b. Wells Pharmacy Network[4]

3. Nomination Clarification
   a. Wells Pharmacy Network

### C. Thymosin alpha-1-related bulk drug substances (Thymosin alpha-1 (free base) and Thymosin alpha-1 acetate)

1. FDA Evaluation

2. Nomination
   a. Wells Pharmacy Network[5]

## III. Points to Consider

### A. December 4, 2024, a.m. session

### Points for the PCAC to Consider Regarding Whether FDA should Include Certain Bulk Drug Substances on the 503A Bulks List

1. FDA is proposing that CJC-1295 (free base) NOT be included on the 503A Bulks List.

2. FDA is proposing that CJC-1295 acetate NOT be included on the 503A Bulks List.

3. FDA is proposing that CJC-1295 DAC (free base) NOT be included on the 503A Bulks List.

4. FDA is proposing that CJC-1295 DAC acetate NOT be included on the 503A Bulks List.

5. FDA is proposing that CJC-1295 DAC trifluoroacetate NOT be included

proceed with the presentation of AOD-9604-related bulk drug substances (AOD-9604 (free base) and AOD-9604 acetate) to the PCAC.

[4] This nomination was withdrawn by the nominator (FDA-2015-N-3534-0471). However, FDA is electing to proceed with the presentation of AOD-9604-related bulk drug substances (AOD-9604 (free base) and AOD-9604 acetate) to the PCAC.

[5] This nomination was withdrawn by the nominator (FDA-2015-N-3534-0470). However, FDA is electing to proceed with the presentation of thymosin alpha-1-related bulk drug substances (thymosin alpha-1 (free base) and thymosin alpha-1 acetate) to the PCAC.

on the 503A Bulks List.

6. FDA is proposing that AOD-9604 (free base) NOT be included on the 503A Bulks List.

7. FDA is proposing that AOD-9604 acetate NOT be included on the 503A Bulks List.

## B. December 4, 2024, p.m. session

### Points for the PCAC to Consider Regarding Whether FDA should Include Certain Bulk Drug Substances on the 503A Bulks List

8. FDA is proposing that Thymosin alpha-1 (free base) NOT be included on the 503A Bulks List.

9. FDA is proposing that Thymosin alpha-1 acetate NOT be included on the 503A Bulks List.