



***NIPTÉ*** The National Institute for  
Pharmaceutical Technology & Education  
***Improving quality and lowering costs of pharmaceuticals***

# Integrated Approach for Evolving Standards for Analytical Characterization: Case Example – Excipient Variability

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# Disclosure

I am a partial owner of Kansas Analytical Services, a company that provides solid-state NMR services to the pharmaceutical industry.

The results presented here are from my academic work at the University of Kansas and the University of Kentucky, and no data from Kansas Analytical Services is presented here.

# Quality Risk Management

“The only difference between an innovator product and a generic product is the formulation” – paraphrase from a comment made at last year’s GDUFA meeting

## Analyze the Product

### Intrinsic – Ingredients and Process

- Formulation – what’s in it
- Manufacturing – how’s it made

### Extrinsic – What is the Product?

- Ingredient variability
- Drug-excipient interactions
- Impact of processing

## Analyze the Performance

### Functional Properties

- *in vitro* composition, disintegration, dissolution,

### Bioequivalence

- *in vivo* clinical performance

# Quality Risk Management

“The only difference between an innovator product and a generic product is the formulation” – paraphrase from a comment made at last year’s GDUFA meeting

## Analyze the Product and its Performance

### Advanced Analytical Methodology

- Drug Substance
- Excipients
- Drug Product
- Interactions
  - Impact on physical properties
  - Physical/chemical stability
  - Transformations



### Functional Properties

- *in vitro* composition, disintegration, dissolution, Bioequivalence
- *in vivo* clinical performance

# Quality Risk Management

## Risk Reduction Opportunities: two “very” common causes

- Deficient Facilities and Processes
- Ingredient Variability – Excipients

### Recalls due to Excipient Variability:

“Oral powder for suspension product **failed dissolution** due to glyceryl behenate acid value”

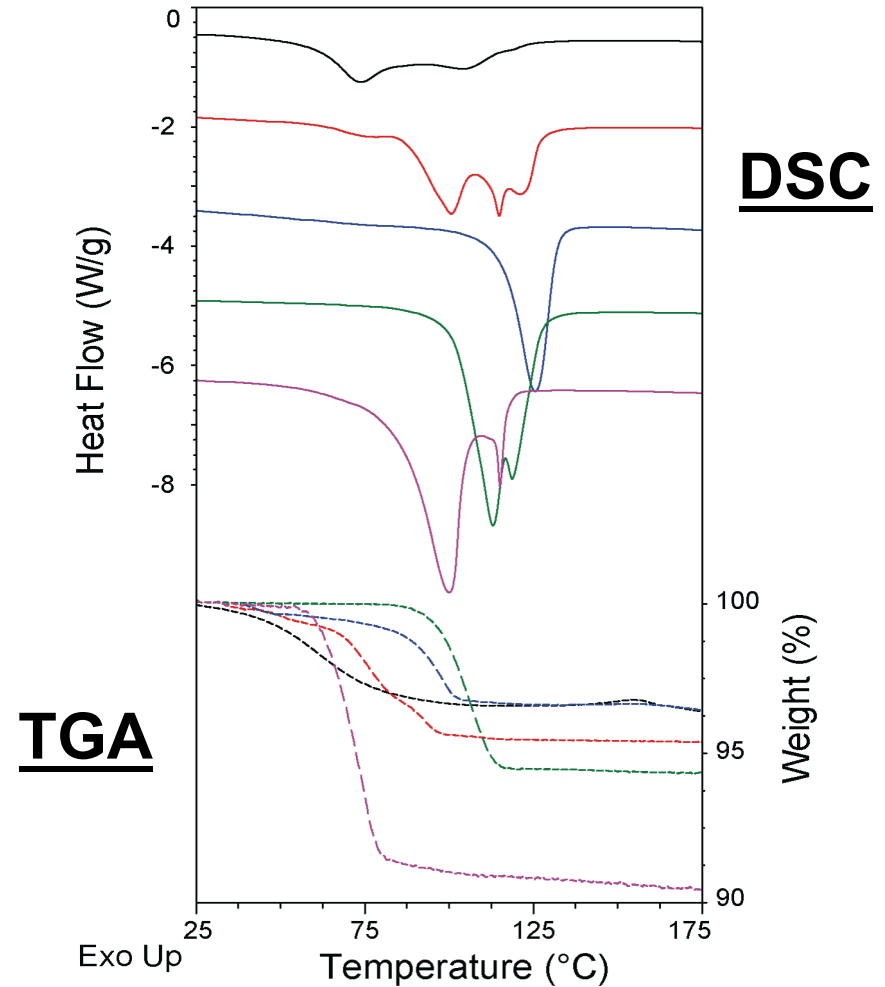
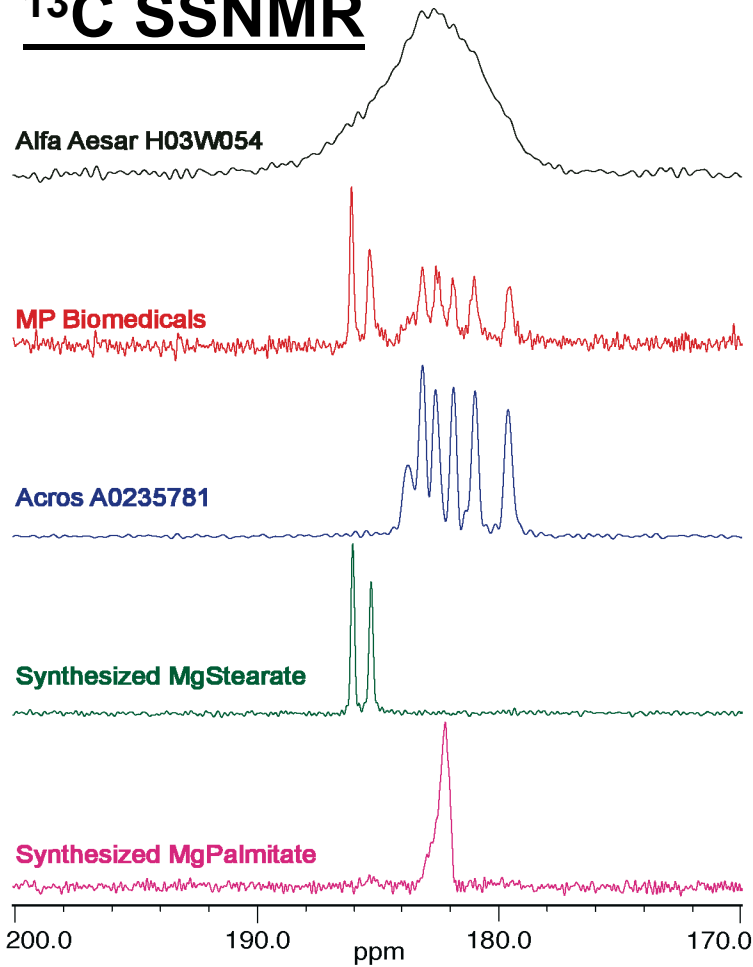
“Extended release tablet **failed dissolution** due to variability of ethyl cellulose excipient”

“Tablet lots had **significant dissolution failures** due to variation in the coating agent, Zein NF...”

“**Dissolution failure** in soft gel capsules as a result of cross-linking of short chain aldehydes and other liquid components”

# Magnesium Stearate: SSNMR, DSC, and TGA correlations

## <sup>13</sup>C SSNMR



# SSNMR Spectroscopy of Formulations Containing MgSt

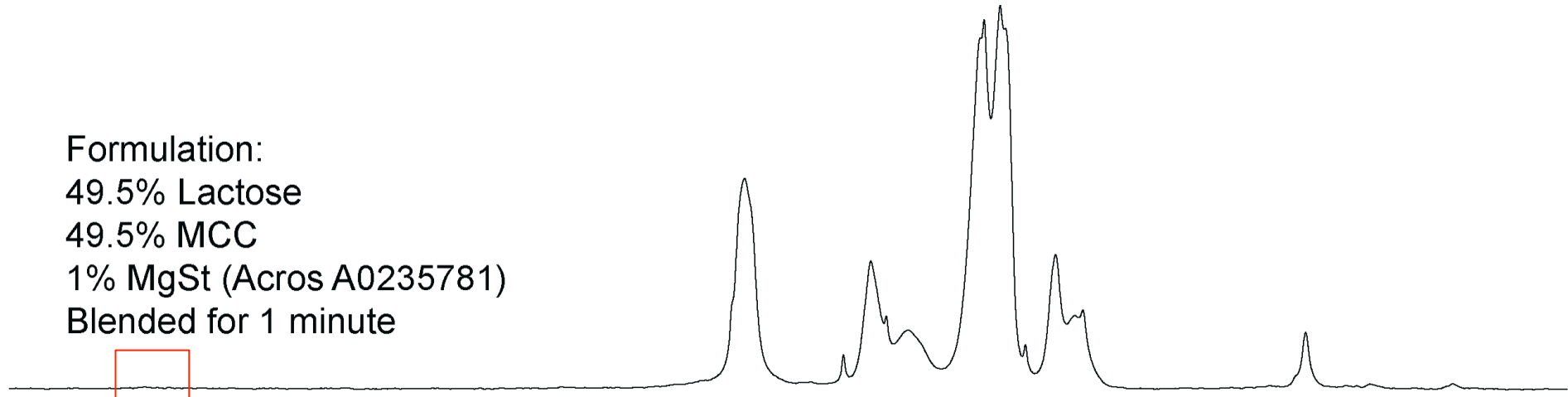
Formulation:

49.5% Lactose

49.5% MCC

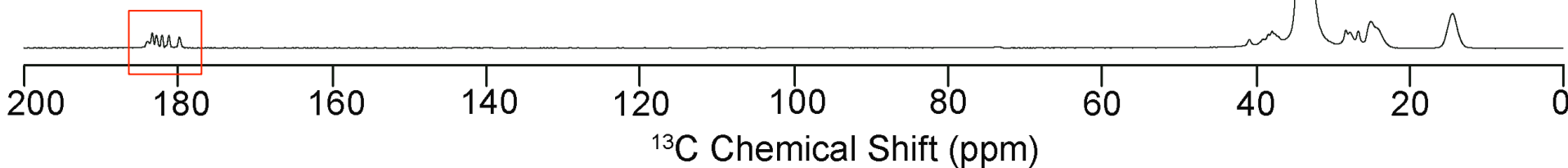
1% MgSt (Acros A0235781)

Blended for 1 minute



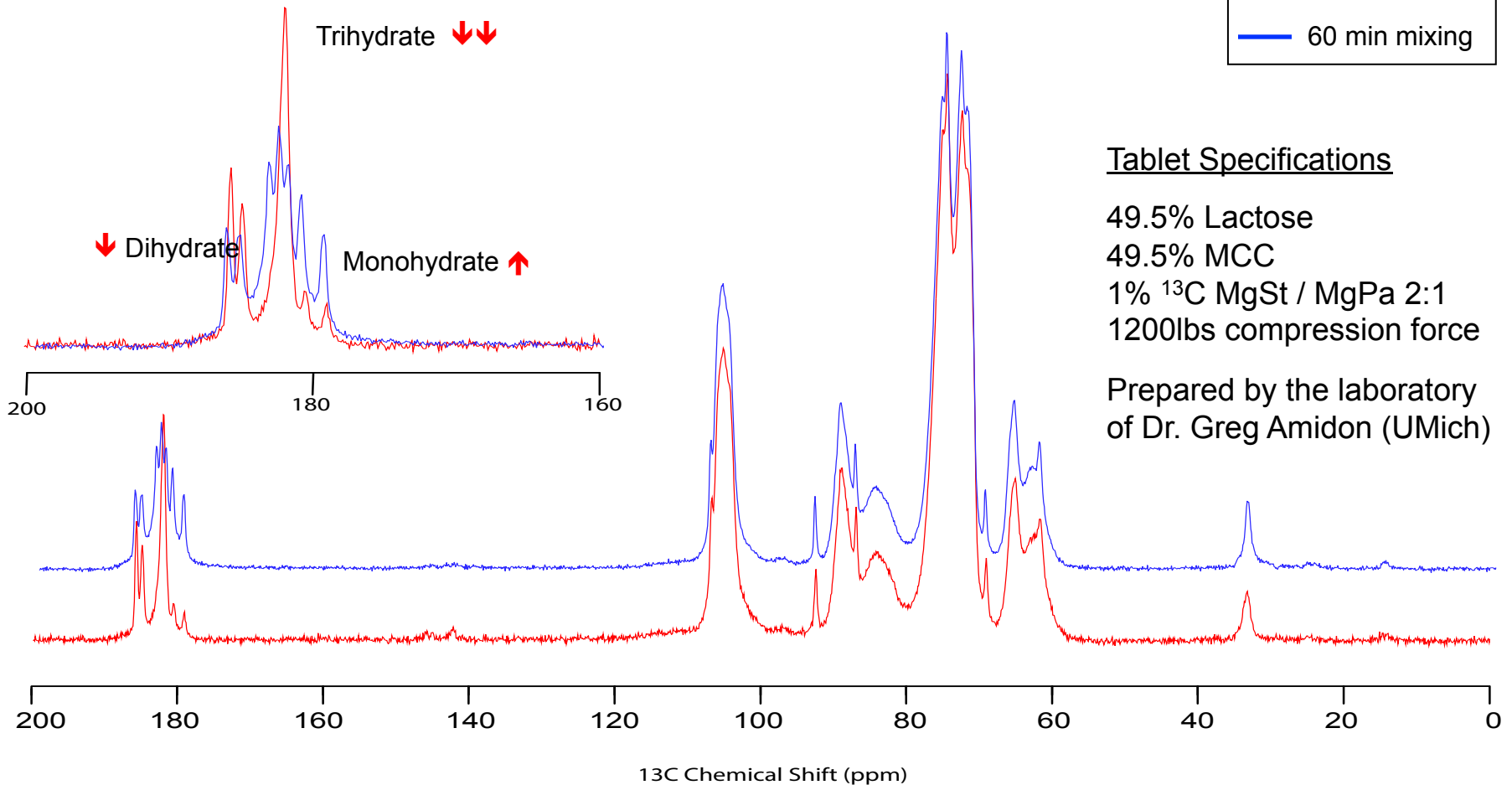
Universal Problem – How do you see a complex excipient at 1% in a formulation?

MgSt (Acros A0235781)



# SSNMR Spectroscopy of Tablets Containing MgSt

2x magnification of carbonyl region



## Tablet Specifications

49.5% Lactose

49.5% MCC

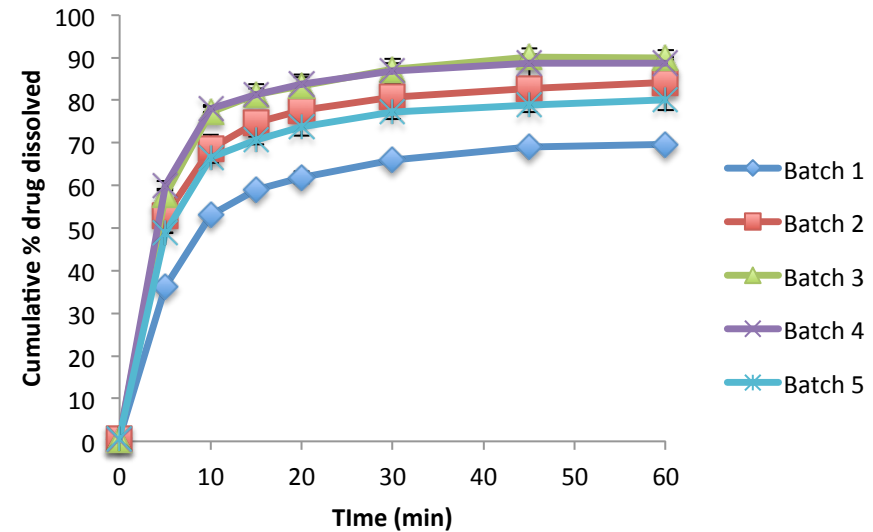
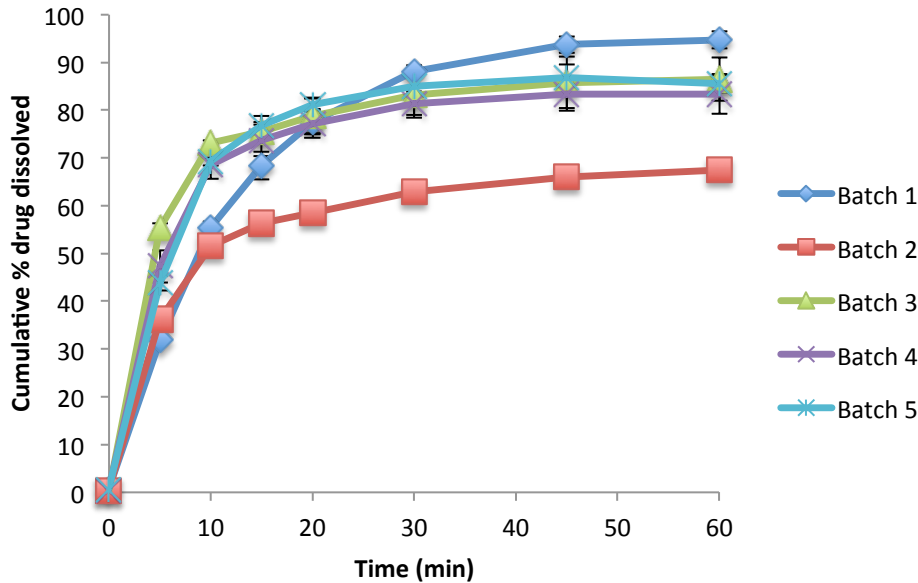
1% <sup>13</sup>C MgSt / MgPa 2:1

1200lbs compression force

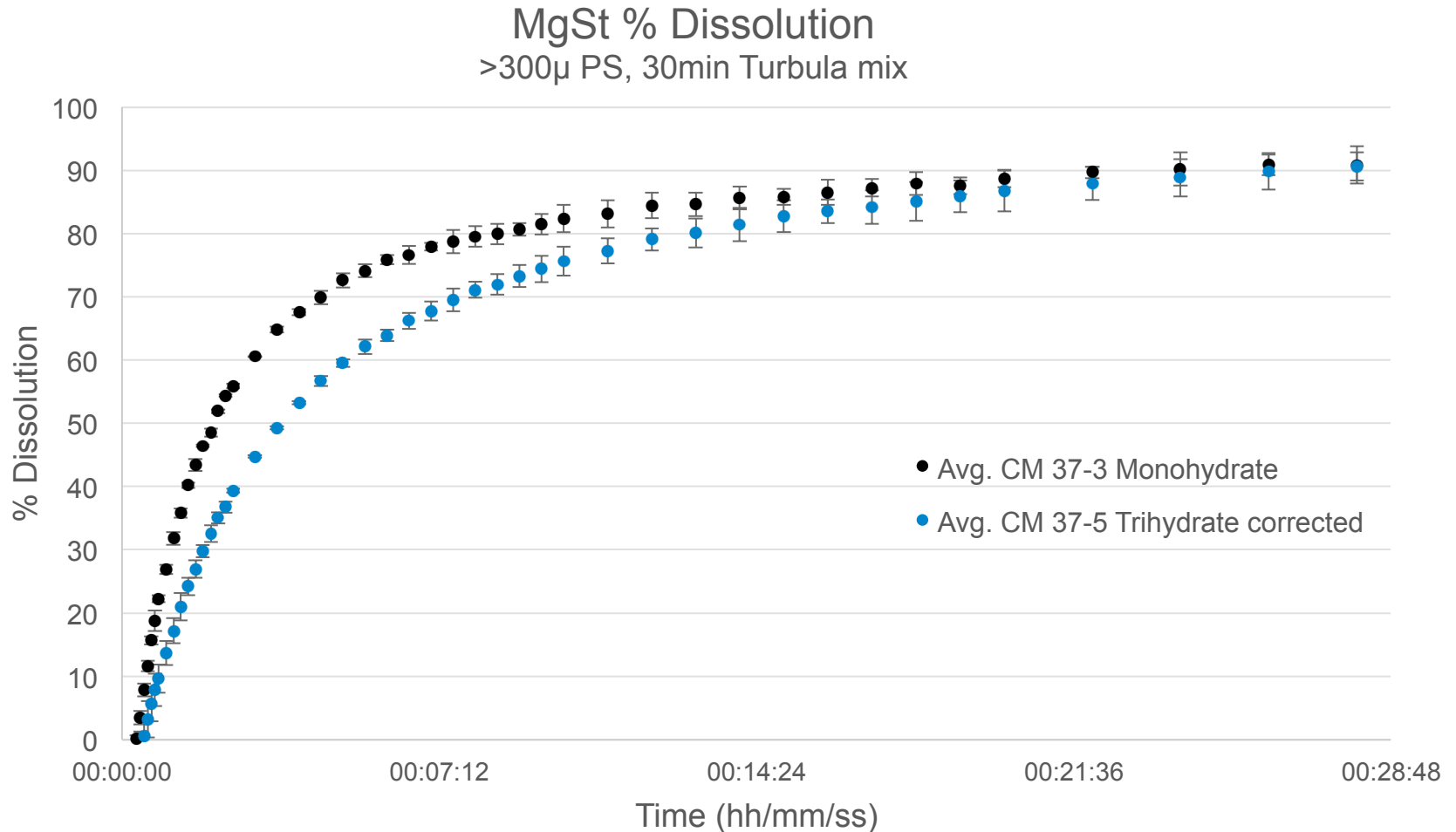
Prepared by the laboratory  
of Dr. Greg Amidon (UMich)



# Impact of MgSt on Dissolution – Mixing Variability



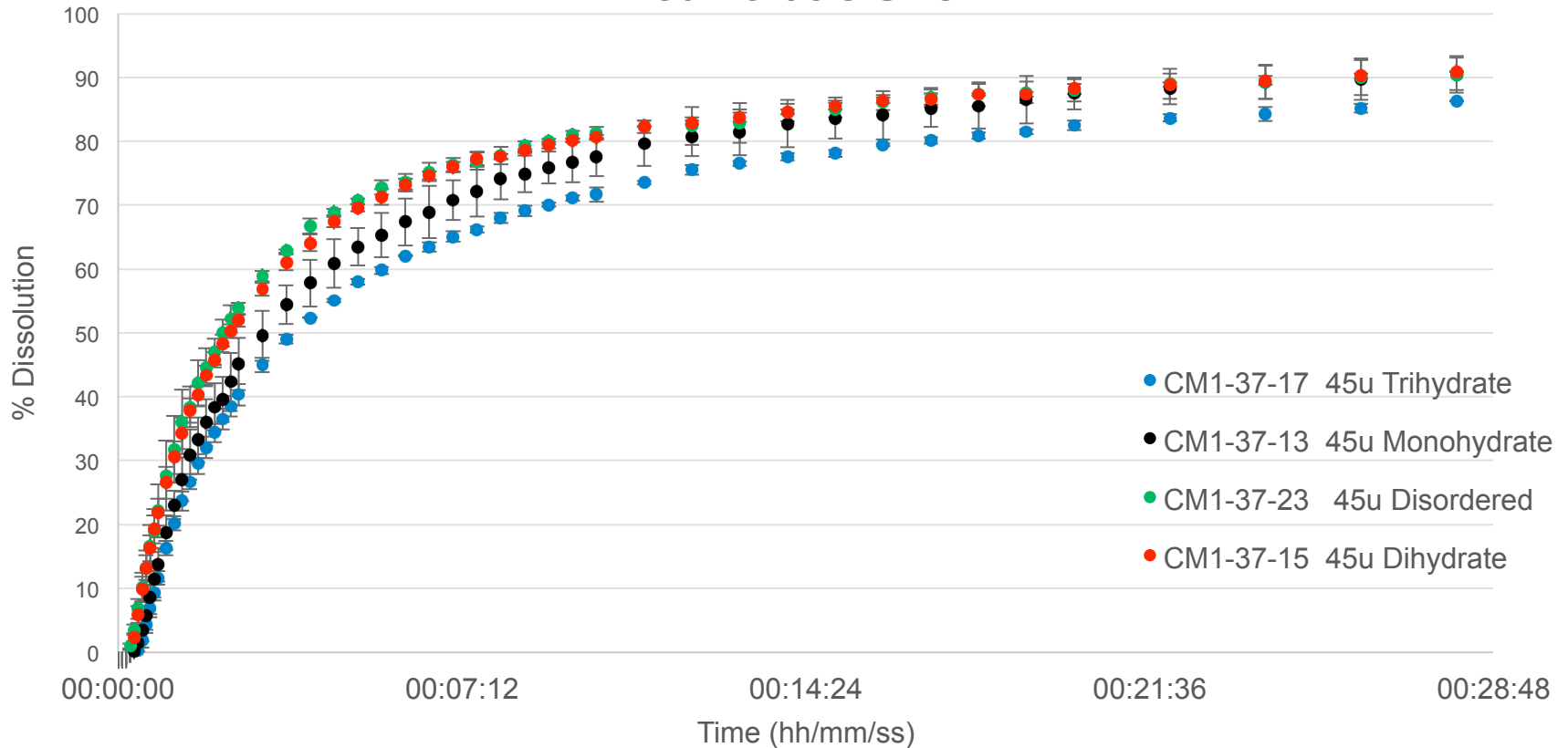
# Impact of MgSt Form on Dissolution – Consistent Mild Mixing



# Impact of MgSt Form/Particle Size on Dissolution

Other parameters  
60 min Turbula mix  
1g/20mL vial  
500psi compression

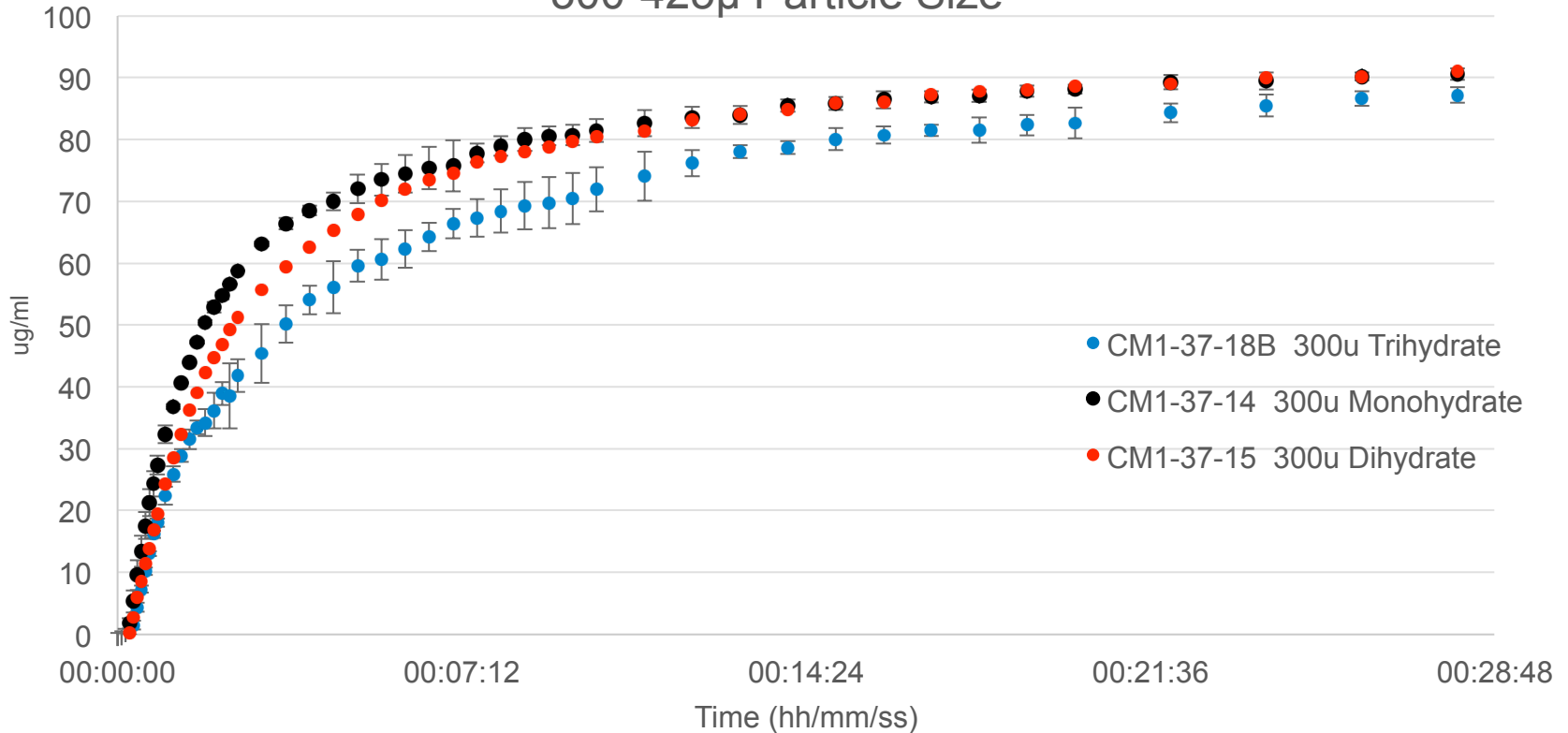
MgSt Tabs - % Dissolution  
All Forms Comparison  
<45u Particle Size



# Impact of MgSt Form/Particle Size on Dissolution

Other parameters  
60 min Turbula mix  
1g/20mL vial  
500psi compression

MgSt Tabs - % Dissolution  
All Forms Comparison  
300-425 $\mu$  Particle Size



## FDA Quality Risk Management

### Analyze the Product and its Performance – **Advanced Analytical Characterization of Dosage Forms**

Integrated approach to understand complex dosage forms, convert it to a knowledge base that is accessible, and translate that to reviewers through education

### Recommendations for FDA Support – Establish Research Priorities for Generic Drug Product Characterization

- What is the optimum portfolio of orthogonal analytics that are needed for product characterization?
- How should these be integrated in design/development space?
- What should be the validation criteria for R&D analytics?
- What is the utility across dosage forms for these analytics?
- What is the relationship between R&D analytics, QC testing, and effective methods for root cause investigations?