

Case study 2: Parenteral Drug Product

1 **Purpose of Case Study 2:** The following case study provides one example of a summary of an elemental
2 impurities risk assessment for a hypothetical new drug product, Greatdrug sterile solution,
3 manufactured by a hypothetical applicant, NewCo. This example assumes that this is the first dossier to
4 be assembled for the drug product. The case study describes one approach to summarizing a risk
5 assessment for elemental impurities in a drug product, and is only intended as an example to help
6 illustrate the risk assessment process describe in ICH Q3D: Guideline for Elemental Impurities. Case
7 Study 2 provides one example of the execution and documentation of an elemental impurity risk
8 assessment that will be maintained in the NewCo Pharmaceutical Quality System. This case study is
9 examples intended to illustrate one approach to implementing the recommendations described in Q3D.
10 They are **not** intended as a template for performing these tasks, and other approaches to performing
11 and documenting the risk assessment may also be acceptable. The data used in this example are
12 fictitious, and are **not** intended to illustrate expectations for elemental impurity levels typically found in
13 drug substances and excipients or contributions to elemental impurity levels in drug products from
14 utilities, processing equipment or container/closure systems. The specific examples chosen are for
15 illustrative purposes only.

16 It should be noted that this specific risk assessment and recommended controls are a small part of the
17 overall product risk assessment and drug product control strategy. Further, the risk associated with
18 direct toxicity from elemental impurities is expected to be low in most drug products.

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33 Case Study 2: Parenteral drug product (small molecule)
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69

70 Introduction

71 This document provides a summary of the product risk assessment prepared in response to the
72 requirements set forth in ICH Q3D: Elemental Impurities. This specific assessment has been prepared
73 for the Greatdrug drug product.

74

75 Key Components of the Quality Target Product Profile (QTPP)

76 Greatdrug is a new therapy intended to treat Type I diabetes. It represents a novel class of insulin
77 mimetic compounds and is formulated as a ready to use (RTU) liquid formulation provided as a 100
78 mg/mL sterile solution. Typical dosing is up to 3x per day (typically 0.2 – 0.4 mL per injection) with a
79 recommended maximum daily dose of 100 mg (1 mL total volume per day). The formulation
80 composition of the drug product is shown in Table 1. The drug product is packaged in individual septum
81 cap Type 1 glass vials (10 and 20 mL fill volumes).

82

83 **Table 1: Greatdrug RTU liquid – quantitative formulation composition**

Component	Formulation composition (per 1000 L)	Formulation composition per unit dose (1 mL)
Greatdrug drug substance	100 kg	100 mg
Sodium chloride	8 kg	8 mg
Potassium chloride	0.2 kg	0.2 mg
Sodium dihydrogen phosphate dihydrate	1.44 kg	1.44 mg
Dipotassium phosphate	0.24 kg	0.24 mg
Hydrochloric acid (1 M)	1 L	0.001 mL
Water for Injection	980 L	0.98 mL

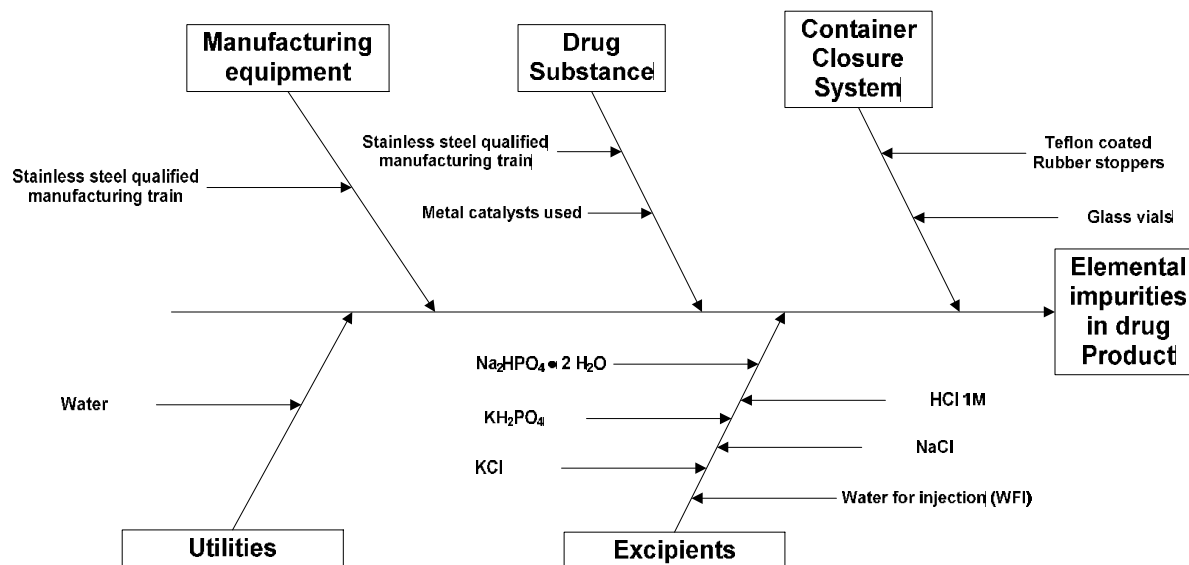
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85 Drug product elemental impurity risk assessment

86 The following elemental impurities risk assessment is an integral part of the overall drug product control
87 strategy. Figure 1 shows a summary of the potential sources of elemental impurities that will be
88 considered in the risk assessment.

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89 **Figure 1: Potential Sources of Elemental Impurities in Greatdrug RTU Liquid**



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92

93

94 Of the five main categories of potential sources of elemental impurities (drug substance, excipients,
95 manufacturing equipment, water and the container closure system), the components with the greatest
96 potential for transfer of elemental impurities to the drug product are the drug substance and several of
97 the excipients used in the drug product. In considering whether to approach the risk assessment from a
98 drug product perspective or through an assessment of the components, a decision was made to conduct
99 the assessment based on an evaluation of the components of the drug product. This approach was
100 selected for several reasons:

- 101
- The manufacturing processes and equipment used do not have a high risk for inclusion of elemental impurity.
 - All of the excipients selected are common excipients of compendial/pharmacopeial grade procured from qualified vendors and are well characterized in the literature and through the internal qualification program.
 - The assessment of the components provides an improved ability to control any identified elemental impurities upstream of the drug product
- 106
107

108

109 Each category and the potential to contribute elemental impurities to the drug product will be discussed
110 in the following sections.

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111 **Drug substance**

112 The synthesis of Greatdrug drug substance involves five (5) steps combining three starting materials
 113 (SMs). Each of the SMs has an associated specification controlling the quality of the material. The
 114 preparation of SM1 uses a Rh catalyst in the penultimate step. Based on the development data for this
 115 SM, its specification includes a 100 µg/g (ppm) limit for Rh. Purging studies that evaluated the removal
 116 of residual Rh during the execution of the drug substance synthetic route showed that there was a 100
 117 fold reduction of Rh levels after the second of five reaction steps. If this level (1 µg/g) was carried over
 118 into the drug product, it would represent 0.1 µg/day Rh in the drug product at that maximum daily dose.
 119 Since this is below the control threshold no additional monitoring of Rh will be performed in the drug
 120 substance (or drug product). The remaining 2 SMs utilize no catalysts in their synthesis.

121 The final drug substance is assembled in five chemical reactions, the penultimate step of which employs
 122 a Pd/C catalyst. During development, the synthetic scheme underwent three separate process changes
 123 from the enabling route used to prepare the preliminary clinical drug substance used in Phase 1 clinical
 124 trials. The final changes in the process (included in process IV, the proposed commercial process)
 125 included optimization of the isolation and washing sequences for the isolated intermediate that
 126 resulted from the catalytic conversion using Pd catalyst in the penultimate step. Purging studies and
 127 monitoring of the final four commercial scale batches confirmed that Pd levels were maintained
 128 reproducibly below 3 µg/g in the drug substance.

129 As part of the release testing of the drug substance throughout development, elemental impurity
 130 monitoring data were collected for each drug substance lot manufactured. The validated method
 131 monitored for the presence of levels of the following potential elemental impurities: Rh, Pd, As, Cd, Hg,
 132 Pb, Cr, V, Ni and Co. The results of these analyses are provided in Table 2 (reference 4). It should be
 133 noted that the screening data collected provided monitoring for the catalysts used in the process but
 134 also for potential inclusion of the class 1 elements (As, Cd, Hg, and Pb) and for potential elemental
 135 impurities related to the manufacturing equipment (primarily comprised of stainless steel).

136 **Table 2: Greatdrug drug substance elemental impurity profile**

Lot number	Process	Scale, kg	Observed levels, ug/g									
			Rh	Pd	As	Cd	Hg	Pb	Cr	V	Ni	Co
ABC-10-01	I	5	nd ²	15.4	nd	nd	nd	nd	nd	nd	nd	nd
ABC-10-02	I	5	nd	14.8	nd	nd	nd	nd	nd	nd	nd	nd
ABC-10-03	II	25	nd	8.9	nd	nd	nd	nd	nd	nd	nd	nd
ABC-10-04	II	25	nd	8.5	nd	nd	nd	nd	nd	nd	nd	nd
ABC-11-01	III	25	nd	3.6	nd	nd	nd	nd	nd	nd	nd	nd
ABC-11-02	III	50	nd	4.2	nd	nd	nd	nd	nd	nd	nd	nd
ABC-11-03	III	50	nd	4.7	nd	nd	nd	nd	nd	nd	nd	nd
ABC-12-01	IV ¹	200	nd	2.5	nd	nd	nd	nd	nd	nd	nd	nd
ABC-12-02	IV ¹	200	nd	2.4	nd	nd	nd	nd	nd	nd	nd	nd
ABC-12-03	IV ¹	200	nd	2.3	nd	nd	nd	nd	nd	nd	nd	nd
ABC-12-04	IV ¹	200	nd	2.2	nd	nd	nd	nd	nd	nd	nd	nd

137 ¹ Proposed commercial route

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138 ² nd = not detected below the method limit of quantitation of 0.000001 µg/g for all elemental
139 impurities.

140 **Manufacturing equipment**

141 While manufacturing equipment presents a potential source of elemental impurities during the
142 production of the Greatdrug drug substance and drug product, the current quality system of NewCo has
143 been designed to minimize and control any potential contribution from the manufacturing equipment.
144 The typical manufacturing equipment used to produce the drug substance consists exclusively of
145 stainless steel (various grades) suitable for parenteral products and a few specialty glass lined stainless
146 steel vessels. The quality system procedures that ensure control of elemental impurities include:

- 147 • Equipment design and installation qualification
- 148 • Reaction compatibility studies for the Greatdrug process
- 149 • Equipment cleaning verification and validation
- 150 • Visual inspection/line clearance procedures
- 151 • Routine maintenance inspections and schedules

152 As part of the development process, an elemental impurities monitoring procedure has been a part of
153 the drug substance release testing program for several years. This monitoring program was established
154 to collect data to support the conclusion that the manufacturing equipment does not contribute to the
155 overall impurity profile of the drug substance. A general, validated method, employing ICP-OES and ICP-
156 MS was established to monitor the following potential elemental impurities: As, Cd, Hg, Pb, Ni, Cr, Co,
157 and V. The synthetic routes cover a broad range of reaction chemistries including acidic, alkaline, high
158 temperature, and aggressive reaction conditions (e.g. high pressure/high temperature/high reactivity
159 reagents). The results of these analyses confirmed the conclusion of the overall manufacturing
160 equipment assessment that there were no substantial contributions of the targeted elements in the
161 drug substances examined. The data for the Greatdrug drug substance lots analyzed in this monitoring
162 program (Table 2) also confirm the assumption that there is no contribution of elemental impurities
163 from the manufacturing equipment used in the drug substance process.

164 Given that the drug substance manufacturing equipment does not significantly contribute to the overall
165 elemental impurities profile, it can be concluded that the contribution from the drug product
166 manufacturing equipment would also not have a significant contribution. The drug product
167 manufacturing process is conducted at ambient temperatures using buffered aqueous solutions. These
168 conditions are significantly less aggressive unit operations than experienced in the drug substance
169 process. As a result, the probability of inclusion of elemental impurities from the drug product
170 manufacturing equipment is less than that observed from the drug substance. Therefore, no additional
171 consideration is required with respect to potential contributions of elemental impurities from the drug
172 product manufacturing equipment.

173 **Container Closure Systems**

174 The drug substance is a solid that is packaged in polyethylene bags prior to final formulation. There are
175 no significant mechanisms that would permit transfer of elemental impurities from the polyethylene bag

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176 to the drug substance. Therefore, contribution of elemental impurities to the drug product from the
177 drug substance container closure system will not be considered further.

178 The Greatdrug RTU Liquid is provided in two different sizes of Type 1 glass vials designed to contain 10
179 and 20 mL of the drug product. The vials sourced are borosilicate glass and have been shown to provide
180 suitable protection and stability for the drug product. The vials are sealed with a fluoropolymer
181 bromobutyl rubber stopper which is then crimp sealed in place with an aluminum seal.

182 In considering the potential for the container closure system to contribute elemental impurities to the
183 drug product, a literature review was completed as well as consultation of vendor supplied information.
184 Recently, Jenke, *et al.*, (*PDA J Pharm Sci and Tech* **2015**, 69 1-48), published a paper that represented a
185 survey of the literature regarding elemental impurities in common packaging components. Summaries
186 of the available elemental impurity data in the review article, related to the vials and stoppers used in
187 the drug product, are provided in Tables 3 and 4.

188 **Table 3: Measured amount of elemental impurities from Type 1 Glass (Total extraction)**

Container closure component	Amount of elemental impurity in the material ppm (µg/g)					
	As	Cd	Hg	Pb		
Type 1 glass vial	0.3	0.5	<0.5	1.0		
	Cr	Ba	Cu	Sb	Co	Ni
	0.2	21	0.1	0.5	<0.1	0.1

189

190 **Table 4: Measured amount of elemental impurities from Stoppers (Total extraction)**

Container closure component	Amount of elemental impurity in the material ppm (µg/g)					
	As	Cd	Hg	Pb		
Bromobutyl rubber	3.0	<0.1	<0.1	1.1		
	Cr	Ba	Cu	Sb	Co	Ni
	2.6	3.6	2.3	<0.1	0.2	1.0

191 It should be noted that the data are obtained through the use of total extraction methods using
192 exhaustive conditions to remove all possible elemental impurities in the components.

193 Tables 5 and 6 were constructed to determine if either of these components would have a substantial
194 impact on the introduction of elemental impurities into the drug product. The calculation summarized
195 below assumes 100% transfer of the observed level of each elemental impurity into the drug product.

196 The amount of additional elemental impurity that could be included in the drug product from vials and
197 stoppers is calculated using the following equations:

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198 *Predicted elemental impurity level*
 199 $= (\text{observed level of elemental impurity}) \times \text{weight of the component}$

200

201 *Potential additional elemental impurity in the drug product*
 202 $= \frac{(\text{predicted elemental impurity in the vial})}{\text{total amount of liquid in the vial}} \times \text{daily dose}$

203

204 **Table 5: Potential contribution of elemental impurities to the drug product – Type 1**
 205 **glass vials**

Element	Observed level, ug/g	Predicted elemental impurity level per vial in the drug product ¹	Potential additional elemental impurity contributed in each daily dose (µg) ²	Parenteral PDE, µg/day
Co	< 0.1	<2 µg	<0.1	5
Pb	1.0	20 µg	1.0	5
Sb	0.5	10 µg	0.5	90
Cd	0.5	10 µg	0.5	2
Cu	0.1	2 µg	0.1	300
As	0.3	6 µg	0.3	15
Hg	<0.5	<10 µg	<0.5	3
Cr	0.2	4 µg	0.2	1100
Ba	21	420 µg	21	700
Ni	0.1	2 µg	0.1	20

206 ¹ Assumes the vial weight is 20 g (representing the 20 mL vial)

207 ² The total daily dose is administered in 1 mL

208

209 **Table 6: Potential contribution of elemental impurities to the drug product – stoppers**

Element	Observed level, ug/g	Level per vial in the drug product ¹	Potential additional elemental impurity in each daily dose (µg) ²	Parenteral PDE, µg/day
Co	0.2	0.4 µg	<0.1	5
Pb	1.1	2.2 µg	0.1	5
Sb	<0.1	<0.2 µg	<0.1	90
Cd	<0.1	<0.2 µg	<0.1	2
Cu	2.3	4.6 µg	0.2	300
As	3.0	6 µg	0.3	15
Hg	<0.1	<0.2 µg	<0.1	3
Ba	3.6	7.2 µg	0.4	700
Cr	2.6	5.2 µg	0.3	1100
Ni	1.0	2 µg	0.1	20

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210 ¹ Assumes the stopper weight is 2 g

211 ² The total daily dose is administered in 1 mL

212

213 The results of the calculations in Tables 5 and 6 show that in all cases the estimated elemental impurity
214 levels is significantly below the control threshold. This is the case even considering that the estimate
215 assumed total extraction of the elemental impurities from each component. Since the conditions, cited
216 in the referenced publication, used to remove the elemental impurities from the vials and stoppers are
217 significantly more exhaustive than the conditions to which the drug product will be exposed during
218 manufacture, shipment and storage, the potential for elemental impurity contribution to the drug
219 product from the container closure system is negligible and requires no additional consideration or
220 control.

221 **Excipients**

222 In order to assess the potential for the inclusion of elemental impurities from the excipients used in the
223 Greatdrug RTU Liquid(see Table 1), three approaches were explored:

- 224 • A literature survey was conducted to identify the potential elemental impurities that could be
225 found in any of the excipients used.
- 226 • The vendors and manufacturers of the excipients were contacted to obtain information on their
227 knowledge of potential elemental impurities in the excipients provided. This information was
228 collected in the form of a standard questionnaire.
- 229 • Generation of potential elemental impurity data for key or critical excipients for which the
230 literature or vendor information was limited.

231

232 The excipients used in the drug product have pharmacopeial requirements (USP, Ph.Eur. and/or JP
233 monographs) with associated elemental impurity limits. During the assessment, it was confirmed that
234 Hg, Cd, Li., Sb, and Cu (and/or related compounds) were not used in the manufacture of any of the
235 excipients. For sodium chloride, the use of compendial grade material (< 1 µg/g As and < 5 µg/g Pb)
236 ensures that the respective contributions are < 0.008 µg/day As and < 0.04 µg/day Pb. For potassium
237 chloride, the use of compendial grade material (< 10 µg/g Pb) ensures that the respective contribution is
238 < 0.002 µg/day Pb. All these contributions are less than the corresponding PDEs. The only excipient that
239 had an elemental impurity that necessitated further analysis was sodium dihydrogen phosphate
240 dihydrate. The current USP monograph permits arsenic (As) levels of up to 16 µg/g and in the current
241 Ph. Eur. monograph As is limited to 2 µg/g. To determine if the compendial limits provide suitable
242 control for Greatdrug RTU liquid, calculations were performed using the following equation.

243 Potential µg/day Arsenic = (USP limit, µg/g) x (wt of excipient in solution, g/mL) x (volume of
244 solution/day)

245 Potential µg/day Arsenic = (Ph. Eur. limit., µg/g) x (wt of excipient in solution, g/mL) X (volume of
246 solution/day)

247

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248 Assessment for As in sodium dihydrogen phosphate dihydrate:

249 USP grade $(16 \mu\text{g/g As}) \times (1.44 \text{ mg Na}_2\text{HPO}_4/\text{mL}) \times (1 \text{ g}/1000 \text{ mg}) \times 1 \text{ mL}/\text{day} = 0.023 \mu\text{g}/\text{day As}$

250 Ph. Eur grade $(2 \mu\text{g/g As}) \times (1.44 \text{ mg Na}_2\text{HPO}_4/\text{mL}) \times (1 \text{ g}/1000 \text{ mg}) \times 1 \text{ mL}/\text{day} = 0.003 \mu\text{g}/\text{day As}$

251 The calculation of the potential level of As in sodium dihydrogen phosphate dihydrate used in the
252 Greatdrug RTU liquid formulation indicates that the control provided by using a compendial grade
253 excipient limits will limit the contribution of As to below the control threshold. There were no other
254 excipients with elemental impurities of concern in the formulation based on the risk assessment and
255 information provided by the vendors. As a result, no additional controls are necessary to ensure
256 compliance with elemental impurity limits in the drug product.

257 **Water**

258 Water for injection is used in the preparation of Greatdrug RTU Liquid. The use of WFI ensures that the
259 potential for introduction of EIs into the drug product is limited. However, this assurance of limited
260 impact has not resulted in global acceptance of exclusion of water from risk assessments even in small
261 volume products. In order to confirm the observed levels of elemental impurities in the WFI produced
262 in the Greatdrug manufacturing facility, periodic testing of the water was performed using a validated
263 elemental impurity screening method (ICP-MS, internal method 2014-143-001M) (reference-3). This
264 method included the elements listed in Table 7 as the target analytes. The potential elemental
265 impurities were selected as they represent the Class 1 elemental impurities and the potential elemental
266 impurities most often found in various stainless steel alloys. The method performance and target
267 analytes are included in Table 7.

268 **Table 7: Method limit of quantitation (Method 2014-143-001M)**

Elemental impurity	Limit of Quantitation, pg/mL
Arsenic	1.0
Cadmium	0.1
Mercury	3.0
Lead	0.3
Chromium	0.2
Molybdenum	7.0
Nickel	1.5
Vanadium	0.1

269

270 The observed elemental impurity levels in the WFI water produced in the manufacturing facility is
271 summarized in Table 8 below. Based on the observed results, the WFI produced has sufficient controls
272 to ensure that the level of elemental impurities will be maintained at or below the PDE for the
273 respective elemental impurity. In order to generate additional data, the water quality will be monitored
274 at a frequency defined by internal procedures.

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275 **Table 8: Representative Elemental Impurity screening results for WFI**

WFI sample description	Elemental impurity level, µg/mL							
	As	Cd	Hg	Pb	Cr	Mo	Ni	V
Jan 2014	<0.001	<0.0001	<0.003	<0.0003	<0.0002	<0.007	<0.0015	<0.0001
April 2014	<0.001	<0.0001	<0.003	<0.0003	<0.0002	<0.007	<0.0015	<0.0001
July 2014	<0.001	<0.0001	<0.003	<0.0003	<0.0002	<0.007	<0.0015	<0.0001
Oct 2014	<0.001	<0.0001	<0.003	<0.0003	<0.0002	<0.007	<0.0015	<0.0001
Dec 2014 (Pre-plant maintenance shutdown)	<0.001	<0.0001	<0.003	<0.0003	<0.0002	<0.007	<0.0015	<0.0001
Dec 2014 (post-plant shut down)	<0.001	<0.0001	<0.003	<0.0003	<0.0002	<0.007	<0.0015	<0.0001
January 2015	<0.001	<0.0001	<0.003	<0.0003	<0.0002	<0.007	<0.0015	<0.0001
April 2015	<0.001	<0.0001	<0.003	<0.0003	<0.0002	<0.007	<0.0015	<0.0001
Daily Exposure vs PDE								
Maximum observed level ¹ , µg/day	0.001 µg	0.0001 µg	0.003 µg	0.0003 µg	0.0002 µg	0.007 µg	0.0015 µg	0.0001 µg
PDE, µg/day	15	2	3	5	1100	1500	20	10
Control threshold, µg/day	4.5	0.6	0.9	1.5	330	450	6	3
Additional controls needed?	no	no	no	no	no	no	no	no

276 ¹ The LOQ for each element was used to calculate a maximum level of each elemental impurity in water
 277 using the maximum daily dose (1 mL) of Greatdrug RTU.

278

279 Based on the screening results, it is clear that the WFI used to produce Greatdrug RTU liquid does not
 280 contribute to the elemental impurities in the drug product. Periodic WFI testing will be performed in
 281 alignment with internal procedures.

282

283 Conclusion of product risk assessment

284 **Components that contribute elemental impurities to the drug product**

285 **Drug substance**

286 Based on the review of the development data as well as the data obtained from four primary
 287 stability/Phase 3 clinical lots manufactured at the proposed commercial manufacturing site it is clear
 288 that the drug substance has some residual Pd associated with the process. In the evolution of the drug
 289 substance process, improvements were made to ensure that the level of Pd was reduced to a limit that
 290 would ensure that the level of Pd in the drug product was at or below the PDE.

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291 The observed Pd level in the Greatdrug drug substance, manufactured using the proposed commercial
292 process (also used in pivotal Phase 3 clinical trials) approaches 3 µg/g but does not exceed 3 µg/g . Since
293 the planned maximum daily dose of Greatdrug is 100 mg/day, the resultant Pd contribution in the drug
294 product would be expected to less than 0.3 µg. This level of Pd in the drug product is below the
295 parenteral PDE (10 µg/day) and below the control threshold for Pd (3 µg/day). The process has been
296 validated and has been shown to be robust. As a result, the controls that are currently associated with
297 the drug substance process ensure the quality of the drug product (from an elemental impurity
298 perspective). At this time, the recommendation is not to include a Pd limit in the specification for the
299 Greatdrug drug substance.

300 **Excipients**

301 The product risk assessment evaluated the current excipients, suppliers and compendial monographs to
302 determine if the predicted and monitored levels of elemental impurities would result in inclusion in the
303 drug product. The only excipient that demonstrated levels of any elemental impurities of concern was
304 sodium dihydrogen phosphate dihydrate. The compendial limits for arsenic for sodium dihydrogen
305 phosphate dihydrate are currently set at 8 µg/g (USP) and 2 µg/g (Ph Eur). If this level was observed in
306 lots of the excipient used to produce Greatdrug RTU liquid, the contribution of arsenic to the drug
307 product is less than 0.1% of the parenteral PDE for arsenic. With the current controls and use of
308 compendial excipients, the elemental impurity levels in the drug product will be maintained below the
309 PDE.

310 The water for injection used to in the Greatdrug RTU Liquid process has been shown to not contribute
311 elemental impurities to the drug product. The controls in place are appropriate to ensure that any
312 contribution of elemental impurities is controlled.

313 **Container closure system**

314 The Greatdrug drug product is a ready to use injectable product. The assessment of the container
315 closure system showed that there were no contributions of elemental impurities to the drug product.

316 **Manufacturing equipment**

317 Based on the results of the elemental impurity monitoring program implemented for the drug substance
318 batches produced during development and the results of the specific testing of representative lots of
319 Greatdrug drug substance produced using the proposed commercial process, it can be concluded that
320 the manufacturing equipment does not contribute any elemental impurities to the drug product. In
321 addition, the periodic monitoring of the WFI used to produce the drug product demonstrates no
322 contribution from the manufacturing equipment used to produce the WFI.

323
324 Control strategy development

325 During the risk assessment, three potential sources of elemental impurities were identified, Greatdrug
326 drug substance, the container closure system and one excipient, sodium dihydrogen phosphate
327 dihydrate. Upon further review and evaluation of the available literature, vendor information, and data,

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328 it was determined that no additional controls are required to ensure that the Greatdrug RTU liquid
329 complies with the limits described in ICH Q3D.

330 For the drug substance, Pd was identified as an elemental impurity. However, the process controls
331 currently in place demonstrate that the Pd will be controlled to at or below the control threshold for Pd,
332 therefore, no additional controls are proposed..

333 The assessment and evaluation of the container closure system (specifically the vial and stopper)
334 identified potential low level elemental impurities arising from these two components. However, if the
335 total amount of each elemental impurity were introduced into the drug product, all levels would remain
336 below the control threshold for each element.

337 The evaluation of the excipients (sodium dihydrogen phosphate dihydrate and WFI) concluded that the
338 use of compendial grades of the excipients used to produce Greatdrug RTU liquid provided appropriate
339 controls to ensure product quality. No additional controls beyond the compendial monograph testing
340 and limits are required.

341 Testing recommendations

342 The conclusion of the risk assessment identified that routine elemental impurity testing was not
343 required. All potential sources of elemental impurities are maintained in a state of control through
344 quality system procedures and processes or process controls included in the drug substance, in-coming
345 material controls and material specifications and drug product processes.

346 No elemental impurity testing of the drug product is proposed at this time since all of the elemental
347 impurity controls have been established up stream of the drug product.

348 **Conclusion**

349 Based on ICH Q3D, a risk assessment was performed to determine the probability of inclusion of
350 elemental impurities in the Greatdrug RTU liquid and to establish the appropriate controls to ensure the
351 quality of the drug product. The assessment examined the sources of elemental impurities and
352 identified several components that had the potential to transfer elemental impurities into the drug
353 product. The risks and the actions taken are summarized in Table 9 below.

354 ***Table 9: Elemental impurity assessment and controls for Greatdrug RTU Liquid***

Potential risks	Action/mitigation
Elemental impurities from drug substance	No action required; process controls sufficient
Elemental impurities from equipment	No action required, Quality system controls sufficient
Elemental impurities from container closure systems	No action required, negligible risk
Excipients	No action required, negligible risk
Water for injection	Negligible risk, periodic confirmatory elemental impurity screening

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355 The risk assessment for elemental impurities in Greatdrug RTU Liquid was completed. The design and
356 implementation of the inherent controls in the manufacturing and quality system processes ensure that
357 the levels of identified elemental impurities are maintained at or below their respective PDEs. If the
358 process is modified or suppliers of the drug product components are changed, the impact of the changes
359 will be evaluated and this risk assessment and control strategy will be updated as necessary.

360 References

- 361 1) ICH Q3D: Elemental Impurities
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367 TR-2015-002
- 368 7) Current JP, Ph. Eur. and USP monographs for <glass containers for pharmaceutical use>,<rubber
369 closures for containers for aqueous parental preparations>, <purified water>, <water for
370 injections>, <sodium chloride>, <sodium dihydrogen phosphate dihydrate>, <dipotassium
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