





From synthesis to bio-transformation: control and management of the quality of APIs

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Qualità di un principio attivo

Nuovi farmaci: EMEA (ICH Guide line)

Farmaci Generici: ICH Guide line Farmacopea INTERNATIONAL CONFERENCE ON HARMONISATION OF TECHNICAL REQUIREMENTS FOR REGISTRATION OF PHARMACEUTICALS FOR HUMAN USE

ICH HARMONISED TRIPARTITE GUIDELINE

IMPURITIES IN NEW DRUG SUBSTANCES Q3A(R2)

Current Step 4 version dated 25 October 2006

This Guideline has been developed by the appropriate ICH Expert Working Group and has been subject to consultation by the regulatory parties, in accordance with the ICH Process. At Step 4 of the Process the final draft is recommended for adoption to the regulatory bodies of the European Union, Japan and USA.

2. CLASSIFICATION OF IMPURITIES

Impurities can be classified into the following categories:

- Organic impurities (process- and drug-related)
- Inorganic impurities
- Residual solvents

Organic impurities can arise during the manufacturing process and/or storage of the new drug substance. They can be identified or unidentified, volatile or non-volatile, and include:

- Starting materials
- By-products
- Intermediates
- Degradation products
- Reagents, ligands and catalysts

Inorganic impurities can result from the manufacturing process. They are normally known and identified and include:

- Reagents, ligands and catalysts
- Heavy metals or other residual metals
- Inorganic salts
- Other materials (e.g., filter aids, charcoal)

Relevance of the impurity content in APIs

Thresholds

Maximum Daily Dose ¹	Reporting Threshold ^{2,3}	Identification Threshold ³	Qualification Threshold ³	
≤ 2g/day	0.05%	0.10% or 1.0 mg per day intake (whichever is lower)	0.15% or 1.0 mg per day intake (whichever is lower)	
> 2g/day	0.03%	0.05%	0.05%	

Isolation could be impossible:

levels should be reduced by improving purification processes

Identification by:

GC or HPLC-MS analysis (hypothesis of the possible structure/s) Chemical synthesis (structure correlation)

General monograph "Substances for pharmaceutical use" (2034)

- To be applied to "all" substances for pharma use
- Describes the general requirements with regards quality and purity
- In particular when a specific monograph is not in compliance with its principles
- Most sections are applicable to fermentation products and products obtained by bio-processes

General monograph 2034 (cont)

- the Related substances Section does not apply to fermentation products, but gives principles to be applied, namely:
 - Qualify and specify main impurities
 - As much as possible identify impurities and specify them
 - Set a limit of « other impurities »

General monograph (2034)

Related substances. Unless otherwise prescribed or justified and authorised, organic impurities in active substances are to be reported, identified wherever possible, and qualified as indicated in Table 2034.-1.

Use	Maximum daily dose	Reporting threshold	Identification threshold	Qualification threshold
Human use or human and veterinary use	≤ 2 g/day	> 0.05 per cent	> 0.10 per cent or a daily intake of > 1.0 mg (whichever is the lower)	> 0.15 per cent or a daily intake of > 1.0 mg (whichever is the lower)
Human use or human and veterinary use	> 2 g/day	> 0.03 per cent	> 0.05 per cent	> 0.05 per cent
Veterinary use only	Not applicable	> 0.1 per cent	> 0.2 per cent	> 0.5 per cent

Table 2034.-1. - Reporting, identification and qualification of organic impurities in active substances

Specific thresholds may be applied for impurities known to be unusually potent or to produce toxic or unexpected pharmacological effects.

If the individual monograph does not provide suitable control for a new impurity, a suitable test for control must be developed and included in the specification for the substance.



The requirements above do not apply to biological and biotechnological products, peptides, oligonucleotides, radiopharmaceuticals, products of fermentation and semi-synthetic products derived therefrom, to crude products of animal or plant origin or herbal products.

Peptides

- Generally used at low daily dose
- Many potential related substances: isomers, results of failures in sequences, cleavages or coupling
- Requirements for related substances included in the general monograph 2034 from 1/07/2009:

Table 20342. – Reporting, identification and qualification of organic impurities in peptides obtained by chemical synthesis					
Reporting	Identification	Qualification			
threshold	threshold	threshold			
> 0.1 per cent	> 0.5 per cent	> 1.0 per cent			

Qualification of Impurities

The level of any **impurity present in a new drug substance** that has been adequately tested in safety and/or clinical studies would be considered qualified.

Impurities in known active ingredient can be qualified comparing the impurity profile with existing commercial products

New impurity in known active ingredient (as reported in Eur. Ph) should be adequately tested in safety and/or clinical studies for qualification.

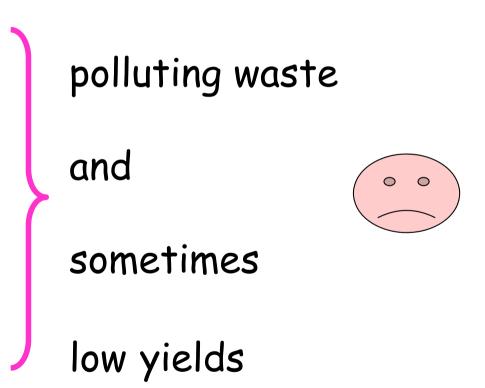
- Genotoxicity studies (point mutation, chromosomal aberration)
- General toxicity studies (one species, usually 14 to 90 days)
- Other specific toxicity endpoints, as appropriate

Time consuming

Delayed registration and commercialization of the product

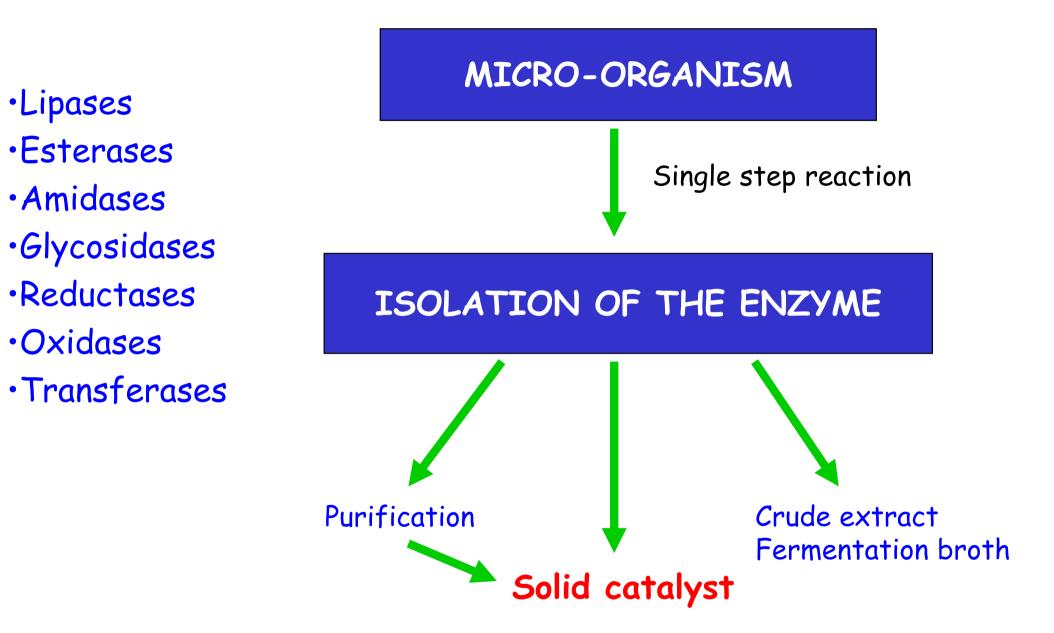
PROBLEMS OF THE CHEMICAL SYNTHESIS

- Use of toxic solvents
 and reagents
- •Time-consuming multi-step procedures
- Formation of by-productsresidual solvents



Use of enzymes in the synthesis of active ingredients

- i. Reaction in aqueous medium (low environmental impact);
- ii. Use of no toxic and no pollutants reagents;
- iii. Soft reaction conditions;
- iv. Avoiding of protection and deprotection steps;
- v. Reduction of the purification steps;
- vi. High purity of the final product.



ENZYME PREPARATION

Free soluble enzymes

Insoluble preparations of pure or almost pure enzymes

Enzymes immobilized on solid supports

Isolated Enzymes

Fermentation BrothCrude extract

Mixture of several proteins

<u>Fermentation-like</u>

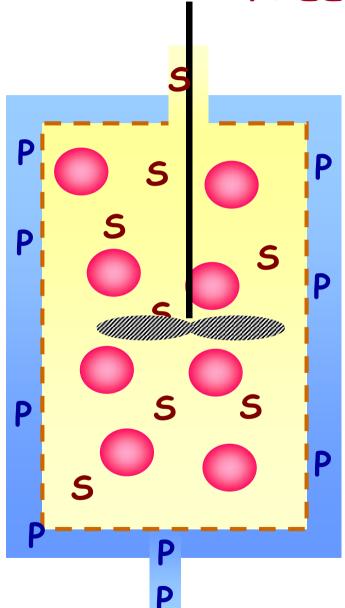
•Residuals arising from micro-organism

• Complex downstream

Purified EnzymesSolid or Immobilised Enzymes

Potential Residual Proteins

No use of animal origins raw material in the production of the enzyme



FREE SOLUBLE ENZYMES

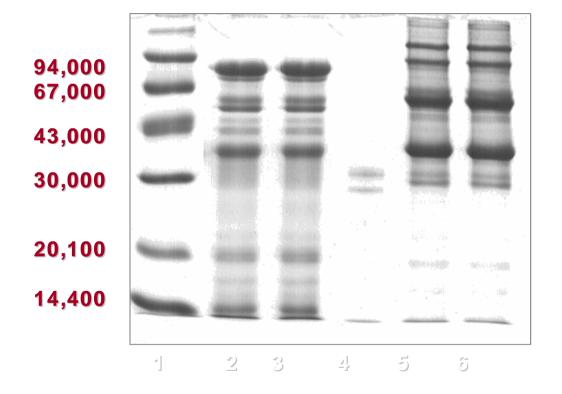
REACTORS WITH ULTRAFILTRATION

- SOLUBLE ENZYMES CAN BE RE-USED
- ALL INACTIVATION MECHANISMS ARE POSSIBLE:

aggregation proteolysis interaction with interfaces

FREE ENZYME ARE OFTEN COMPLEX MIXTURES

SDS-PAGE RML



- Contamination by different proteins
- ·Side reactions catalyzed by different enzymes
- •Other contaminants contained in the crude extract

OPTIMIZATION OF THE BIO-CATALYST: SOLID AND INSOLUBLE ENZYMES

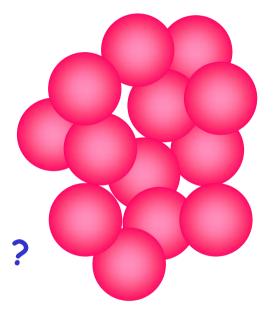
OPTIMIZED ENZYMES

Re-use of the biocatalyst Stabilisation of the biocatalyst Simplification of the downstream

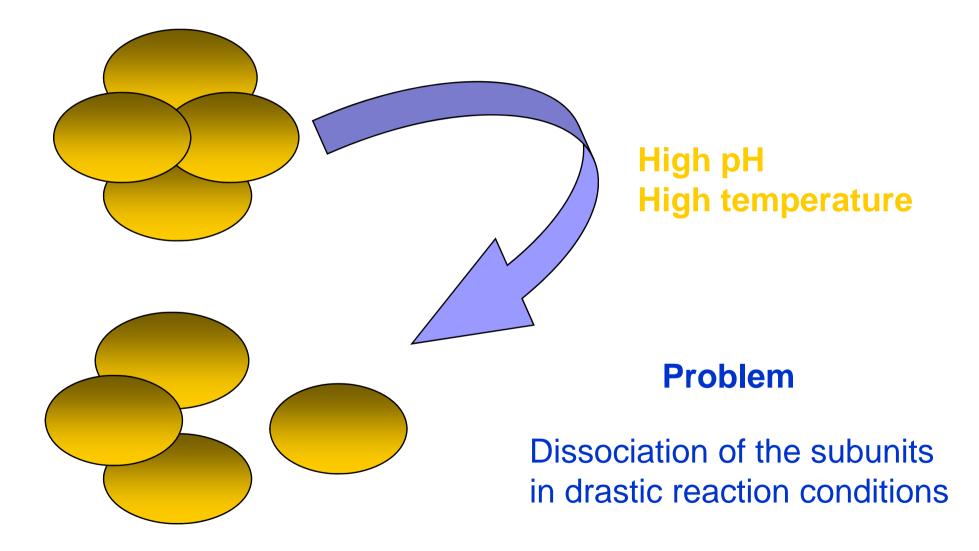
Improved stability Improved yields No contamination

ENZYME DERIVATIVES WITHOUT SUPPORT

All the solid is enzyme
No cost of the support
mechanical stability
Rigidificaction of the enzyme ?
Micro-environment ?



Stabilization of Multimeric Enzymes



POSSIBILITIES

Crosslinked Enzyme Crystals

Crosslinked Enzyme Aggregates

<u>CLECs</u>

Pure crystalline enzyme:

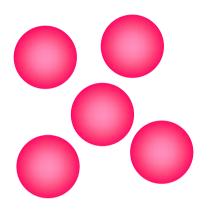
requirement of extreme pure enzyme

Stabilization of Multimeric enzymes Crude enzyme: Co-aggregation of enzyms Aggregation of enzyme and polymer Stabilization of multimeric enzymes

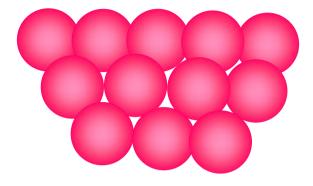
CLEAs

Preparation of CLEAs

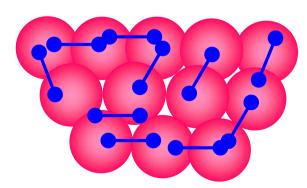
CLEAs



+ Floculating agent: PEG Salts, solvents







Cao L. et al; Org. Lett (2000) 2: 1361-64

IMMOBILIZATION OF ENZYMES ON PREEXISTING SUPPORTS

• covalent multi-point attachment

•reversible immobilization by adsorption

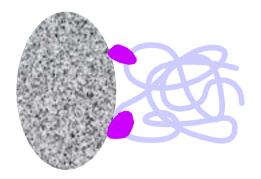
cost of the support

residues after inactivation of the catalyst (covalent derivatives)

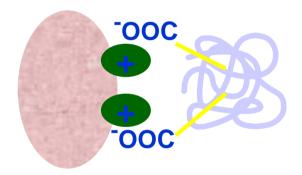
• possible release of protein in the reaction medium

Extreme temperature and presence of co-solvents

Extreme temperature and pH HYDROPHOBIC ADSORPTION

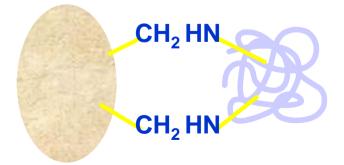


IONIC ADSORPTION



No release; Special case: multimeric enzymes

COVALENT ATTACHMENT



Optimisation of the catalyst

Design of the enzyme derivative

StabilityCatalytic properties

Avoid the Release of protein in the reaction medium

IMMOBILIZATION BY ADSORPTION

• Easy protocols of immobilization

• The support can be re-used after enzyme inactivation

^CReduction of residues

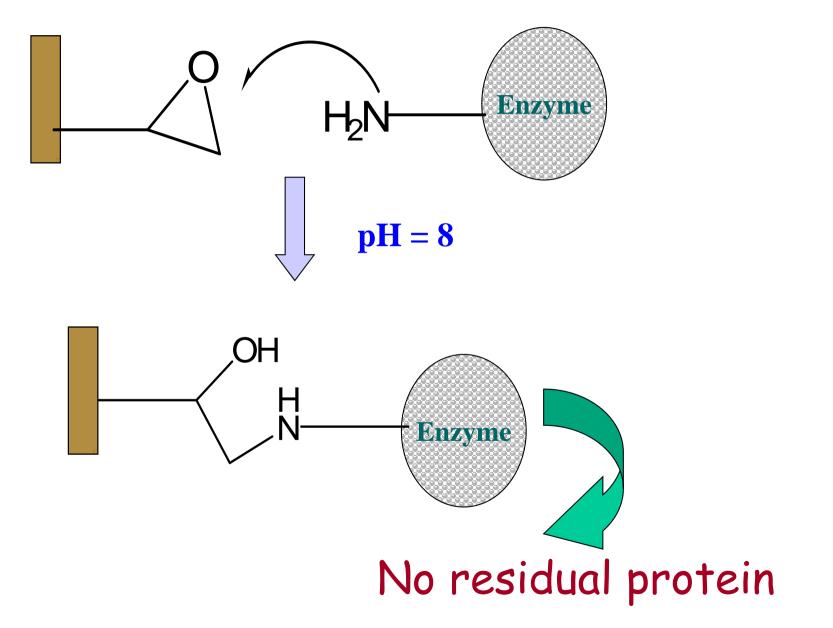
 Possible product contamination with the enzyme



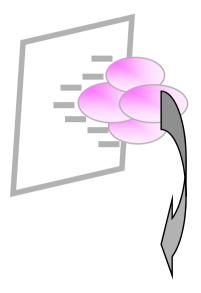




Covalent Immobilisation on Epoxidic Supports



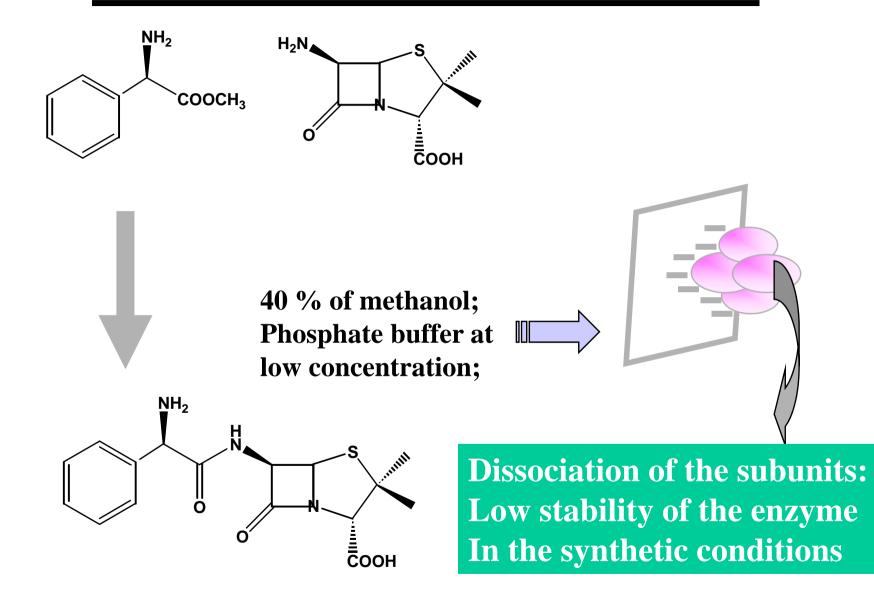
Special case: Multimeric enzymes



Covalent immobilisation

Dissociation of the subunits:Low stability of the enzymeResidual protein in the final product

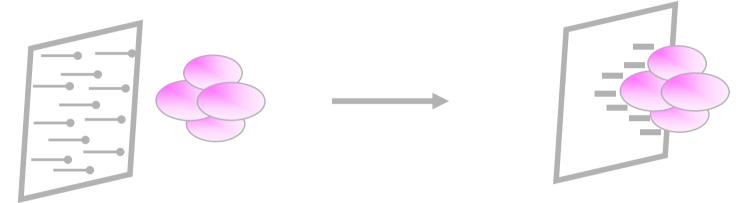
Enzymatic synthesis of Ampicillin



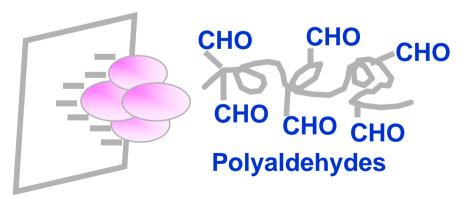
Enz. Microb. Technol. 25 (1999) 336-343

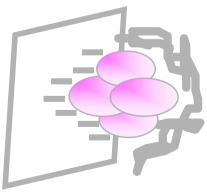
AN INTEGRATED APPROACH TO THE STABILIZATION OF MULTIMERIC ENZYMES

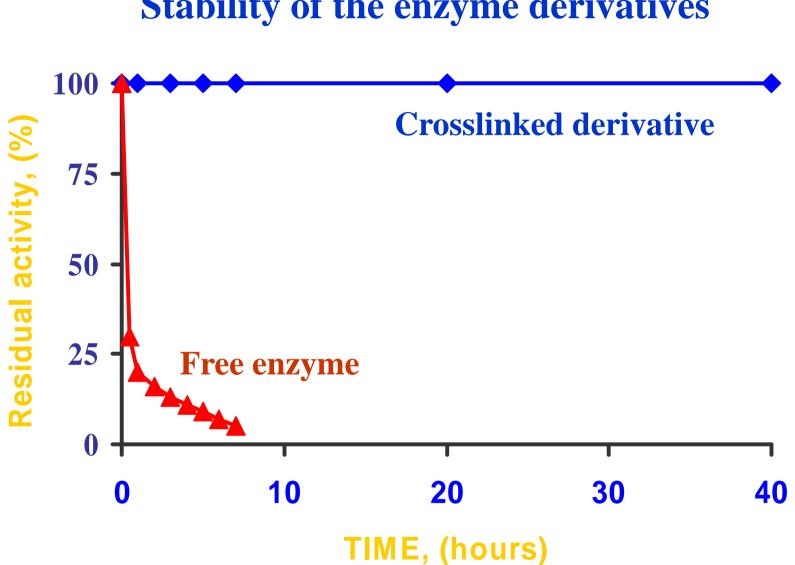
1. MULTI - SUBUNIT COVALENT IMMOBILIZATION



2. SUBUNIT CROSSLINKING WHIT POLYFUNCTIONAL MOLECULES







Stability of the enzyme derivatives

Immobilised Enzyme

Control of residual proteins

Knowledge of the catalyst engineering

Suitability of the downstream process

Test for release of proteins in the reaction condition

Test for residual proteins in the final product

1. Fermentation Processes

01/2008 1468

PRODUCTS OF FERMENTATION

Producta ab fermentatione

This monograph applies to indirect gene products obtained by fermentation. It is not applicable to:

- monographs in the Pharmacopoeia concerning vaccines for human or veterinary use;
- products derived from continuous cell lines of human or animal origin;
- direct gene products that result from the transcription and translation from nucleic acid to protein, whether or not subject to post-translational modification;
- products obtained by semi-synthesis from a product of fermentation and those obtained by biocatalytic transformation;
- whole broth concentrates or raw fermentation products.

General monograph « Products of fermentation » (1468)

- Scope:
 - « Indirect » gene products obtained by fermentation
- Out of the scope:
 - Vaccines, products from continuous cell lines, of animal/human origin
 - Direct gene products
 - Semi-synthetic products, biocatalytic process
- Provides general requirements for manufacture of fermentation products. Compliance mandatory for these products

FERMENTATION

<u>Advantages</u>

•One step reaction: synthesis of complex molecules

• Low costs

<u>Disadvantages</u>

Complex mixtures

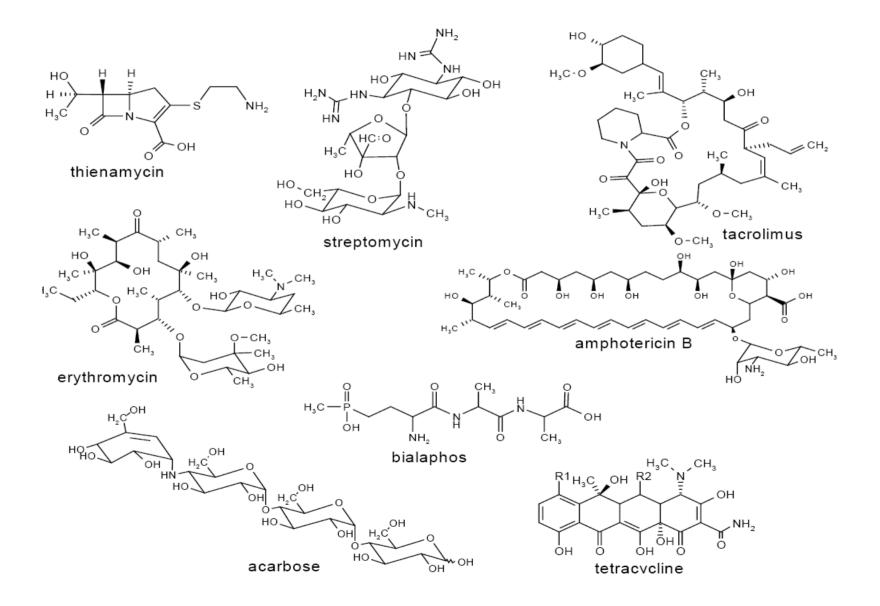
Contaminants with different structures

Residuals arising from micro-organisms

Complex downstream

•Complex separation and analytical procedure for control of impurities

Product of fermentation Complex structures



Simple compounds, normally prepared by chemical synthesis, are more and more prepared by fermentation. For example:

- Aminoacids
- Nucleosides and nucleotides
- Vitamins

Control of the quality is depending from the process used.

Requirements

- Source and history of the producer micro-organism
- Characterisation, stability, of the producer microorganism
- Detailed description of fermentation, incl materials, preparation of media, downstream processing
- In-process controls at all stages
- Purity of the final substance: impurity profile and specification

Impurity profile

- Impurities (3.2.S.3)
 - Describe all potential related substances (sometimes complex), focus on actual impurities
 - Address residual solvents according to European guidelines
 - Discuss particular impurities arising from fermentation: residues of substrates, cells residues, proteins,...

Limits for related substances

- Set limits according to the monograph
- Set limits for the other known impurities
 - Qualify impurity profile by comparison with products already on the market, or tox data
 - In line with levels found in batches
- Set limits for unknown impurities + total impurities

Limits for residual solvents

- According to ICH and CHMP guidelines on Residual solvents
- Show absence of the solvents used during purification
- Set limits and propose methods for solvents used during purification

Other impurities

- Demonstrate that there are no residues from fermentation
- Proteins: not a concern for oral use (a lime proposed), to be addressed if parenteral use (absence should be demonstrated)

• DNA

• The **Ph. Eur** provides **general methods** which can be used

downstream:

Elimination of residuals from micro-organism

•Extraction with organic solvents

allows complete elimination of residuals. Presence of residual indicate a not well separation of phases.

Crystallization in organic solvent

Most adequate for residuals elimination

Ultra filtration

Residuals of low molecular weight proteins and peptides

Chromatographic columns

Complete elimination of protein is ensured depending from the chromatographic conditions

Problems for high water soluble products:

- Peptides
- •Amino acids
- •Oligosaccharides
- Nucleosides and nucleotides

Evaluation of residuals arising from the micro-organism

Absence of residuals from the microorganism should be demonstrated during process validation
Product for injection should be carefully controlled

Nucleic acids

Absorbance testsRT-PCR or PCR

Proteins

Colorimetric tests: Bradford, Lowry or other according to the *Monograph for Assay of Total Protein 2.5.33* (01/2008:20533)
Electrophoresis

Example of fermentation product: L-serine

Isolation from fermentation broth:

- Filtration of biomass
- Anionic and cationic exchange resins

Purification:

- Ultrafiltration of water solution (cut-off m.w.>6000)
- Crystallization from water

Possible impurities:

Aminoacids. Analysis performed with A.A. analyzer (each NMT 0.2%; total NMT 1.0%).

Absence of protein demonstrated by Bradfford assay (colorimetric: LOD 1ug/mL)

Example of Enzymatic bioprocess: L-serine



Enzyme Isolation from fermentation broth:

- Filtration of biomass
- Solution is directly used without purification of the enzyme

Purification:

- Ionic exchange colums
- Crystallization from organic solvent/water solution
- Ultrafiltration of water solution (cut-off m.w.>5000)
- Crystallization from water

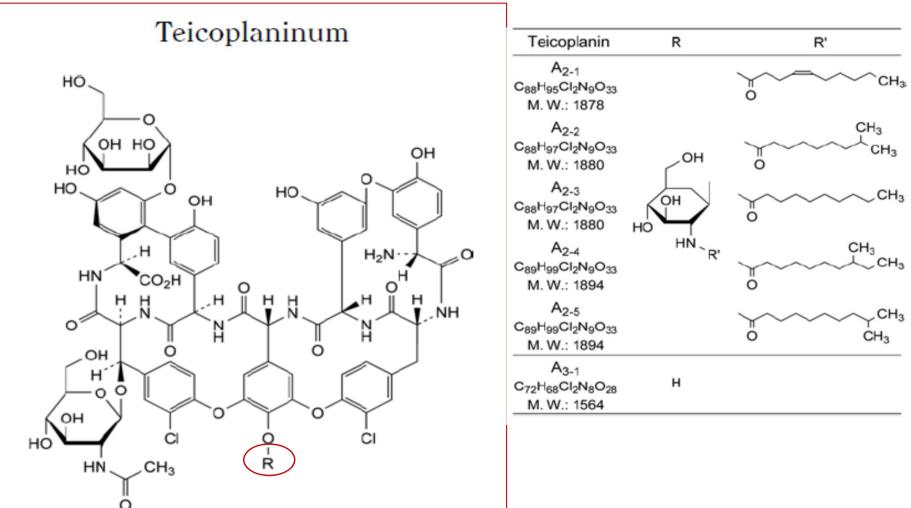
Possible impurities:

Glicine (starting material) and other A.A. Analysis performed with A.A. analyzer (each NMT 0.5%; total NMT 1.0%).

Absence of protein demonstrated by adsorbance at 650 nm (LOD 40 ppm)

Example of fermentation product: Teicoplanine....a long story

01/2009:2358 corrected 6.6



Is a Complex mixture of products. Problems related to:. •Identification •Quality

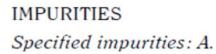
Teicoplanine

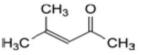
Limits:

- teicoplanin A₂ group: minimum 80.0 per cent;
- teicoplanin A₂₋₂: 35.0 per cent to 55.0 per cent;
- teicoplanin A₂₋₁ group: maximum 20.0 per cent;
- teicoplanin A₂₃ group: maximum 20.0 per cent;
- teicoplanin A₂₄: maximum 20.0 per cent;
- teicoplanin A₂₅ group: maximum 20.0 per cent;
- teicoplanin A₃ group: maximum 15.0 per cent;
- total of impurities other than mesityl oxide with a relative retention more than 1.25: maximum 5.0 per cent;
- disregard limit: the area of the peak due to teicoplanin A₂₋₂ in the chromatogram obtained with reference solution (b) (0.25 per cent).

Composition of the "Complex" and related substances are strictly dependent from:

- •Microorganism
- Control of the Fermentation process
- Raw material used for fermentation process





A. 4-methylpent-3-en-2-one (mesityl oxide).

Teicoplanine New Producer Japan Pharcopoea (JP)

JP Specification	Teico Batch A	Teico Batch B	Teico Batch C
TA2 Group NLT 80%	95.24	94.04	90.50
TA3 Group NMT 15%	3.71	4.45	8.28
Other NMT 5%	1.05	1.51	1.22

Commercial Medicinal product (Tangosit) and the new Teicoplanine API meet specification for JP

Csilla Frank; Controllo della qualità di un prodotto di fermentazione: aspetti tecnici e regolatori Thesis "Master in Discipline Regolatorie 2008"; University of Pavia; Pavia; Italy

Teicoplanine: satisfaction of EP Specification

Out of Specification

EP Specification	Teico Batch A	Teico Batch B	Teico Batch C
TA2-1 Group NMT 20%	10.65	6.32	8.62
TA2-2 Group NMT 35-55%	59.54	56.54	55.01
TA2-3 Group NMT 20%	9.04	10.69	8.95
TA2-4 Group NMT 20%	4.27	7.51	5.05
TA2-5 Group NMT 20%	2.79	5.26	3.57

Conform with the Specification

EP Specification	Teico Batch A	Teico Batch B	Teico Batch C
TA2-1 Group NMT 20%	9.3	8.3	7.7
TA2-2 Group NMT 35-55%	47.7	47.7	48.7
TA2-3 Group NMT 20%	8.2	7.5	7.0
TA2-4 Group NMT 20%	14.8	14.1	13.5
TA2-5 Group NMT 20%	6.7	7.1	7.1



Modulation of fermentation condition Selection of the ingredient used during fermentation

Csilla Frank; Controllo della qualità di un prodotto di fermentazione: aspetti tecnici e regolatori Thesis "Master in Discipline Regolatorie 2008"; University of Pavia; Pavia; Italy



30 June 2012 EMA/CHMP/CVMP/QWP/199250/2009 corr Committee for Medicinal Products for Human Use (CHMP)/ Committee for Medicinal Products for Veterinary Use (CVMP)

Guideline on setting specifications for related impurities in antibiotics

5.1. Active substances manufactured by semi-synthesis

Semi-synthetic substances are obtained from a fermented starting material by a process involving at least cleavage and formation of covalent bonds and including extraction/purification steps. Acceptance criteria for related impurities should be set in accordance with the thresholds given below.

The ICH Q3A thresholds for reporting, identification and qualification apply.

Reporting threshold: 0.05%/0.03% Identification threshold: 0.10%/0.05% Qualification threshold: 0.15%/0.05%

5.2. Active substances manufactured by fermentation, single compound

Acceptance criteria for related impurities should be set in accordance with the thresholds given below.

Reporting threshold: 0.10% Identification and qualification thresholds: 0.15%

5.3. Active substances manufactured by fermentation, family of compounds

Acceptance criteria for related impurities should be set in accordance with the thresholds given below.

Reporting threshold: 0.10% Identification threshold: 0.15% Qualification threshold: 0.50%/0.2%

The qualification threshold of 0.50% for structurally closely related impurities (see definition) is combined with a qualification threshold of 0.2% for other related impurities. Justification for claiming that a related impurity (compound not defined to be included in the active substance) is structurally closely related to the parent compounds should at least be based on evidence such as HPLC/mass spectrometry or the use of reference materials. The proposed 0.50%/0.2% limits are suggested to apply even for daily doses of ≥ 2 g, which may be relevant for some of these antibiotics.

6.3.3. Existing active substances subject to Ph. Eur. monograph, without transparency statement

The impurity profile should be characterised and individual impurities identified, when necessary to comply with this guideline.

Impurities should be qualified, when necessary to comply with this guideline as described in the General requirements section.

6.3.4. Revision of Ph. Eur. monographs

A revision of the Ph. Eur. monograph should be initiated when:

- The means of identification of known impurities have been established
- New impurities have been identified or qualified

According to Directives 2001/82/EC and 2001/83/EC as amended, the Pharmacopoeia should be informed by the relevant authority when a monograph is insufficient to control the quality of a substance.

Limit for impurities in Teicoplanin?

According to Guide line on setting specification for related impurities in antibiotics

Proposed limits for Active Substances manufactured by
fermentation: Fanmily of compound
Reporting threshold:0.10%
0.10%
0.15%Identification threshold unknown0.15%Qualification threshold related0.50%Identification at least by HPLC-MS0.50%



Assessment report

Review under Article 5(3) of Regulation (EC) No 726/2004

Teicoplanin

Additional limits and tests proposed for the active substance subcomponents, based on the batch results and proposal for the Ph. Eur. monograph revision

Teicoplanin A3 group	4.0 - 12.0%
Teicoplanin A2 group	84.0 - 93.0%
Teicoplanin A2-1 group	10.0 - 19.0%
RRT about 0.85 (RS3):	0.5-5.5%
RRT about 0.88 (RS4)	0.5-4.0%
RRT about 0.93 (A2-1)	2.0-7.0%
Teicoplanin A2-2	37.0% - 50.0%
Teicoplanin A2-2 Teicoplanin A2-3 group	37.0% - 50.0% 5.0 - 11.0%
•	
Teicoplanin A2-3 group	5.0 - 11.0%
Teicoplanin A2-3 group RRT about 1.03 (A2-3)	5.0 - 11.0% 4.0-8.5%

Related substances

NMT 5.0%

Any non-teicoplanin like impurity	NMT 0.5%
RRT about 1.38	NMT 2.5%
RRT about 1.30 (RS2)	NMT 1.5%
RRT about 1.25 (RS1):	NMT 1.5%

Any other peak in the chromatogram should be identified and confirmed to have a teicoplanin-like structure.

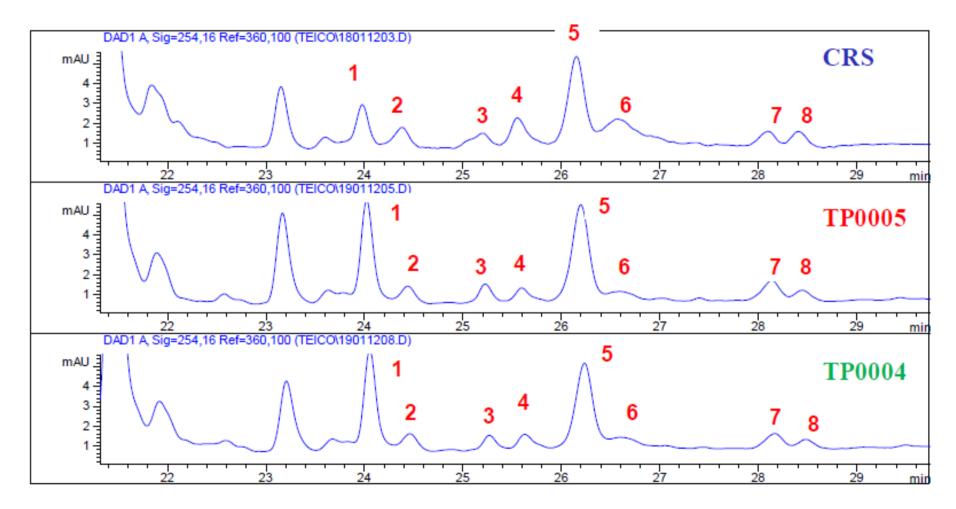
Analysis of teicoplanin chromatogram available (EDQM web site)

A2-2 A2-4 Mesityl oxide m A3 A2-1 A2-3 A2-5 R.S.

The following chromatogram is available at the EDQM website, knowledge database:

EVALUATION OF TEICOPLANINE QUALITY

- 1. Evaluation of the complex according to the EMA guide line.
- 2, Comparission of the new product with EP-CRS and commercial product



- 3. Confirmation of Teicoplanine-like impurities by HPLC-MS analysis
- 4. Specification for impurities >0.5% specified by RRT
- 5. Revision of the EP monograph under evaluation accordingly

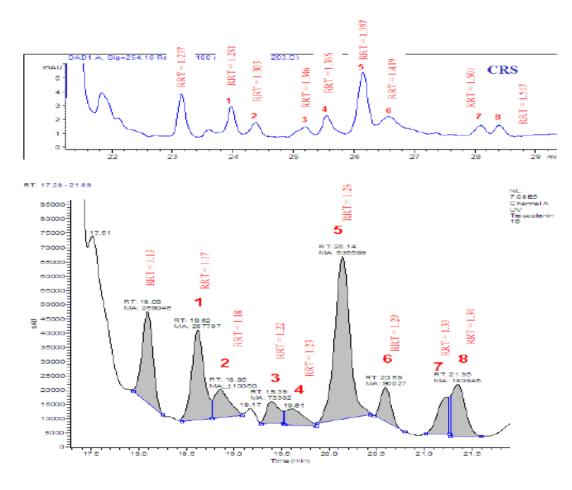


Figure 9: UV traces of the unknown impurity region obtained with method D (top) and method E (bottom). Peak with RRT = 1.13 belongs to A2-5 impurities. Unknown impurities with RRT>1.25 are labeled from 1-8.