

Impianti dedicati e multipurpose per la produzione di principi attivi  
e medicinali: aspetti regolatori ed operativi

**L'impatto della nuova linea-guida sul  
calcolo dei limiti dell'API residuo  
negli studi di cleaning**

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## Normative di riferimento

*DRAFT Guideline on setting health based exposure limits for use in risk identification in the manufacture of different medicinal products in shared facilities (EMA/CHMP/CVMP/SWP/169430/2012)*

*Guideline on the Limits of Genotoxic Impurities (EMA/CHMP/CVMP/QWP/251344/2006 and CHMP/SWP/5199/02)*

*ICH Impurities: Guideline for Residual Solvents Q3C(R4)*

*Updated on revision of Chapters 3 and 5 of the GMP Guide: «Dedicated facilities» (EMA/INS/GMP/809387/2009)*

## *La linea-guida viene presentata come ...*

*The new Guideline became necessary because of the more scientific approach of the Chapters 3 and 5 in the EU GMP Guideline:*

«[...] GMP/GDP Inspectors Working Group has agreed that the use of dedicated facilities should normally be required when beta-lactam antibiotics are produced. [...] when live pathogenic organisms are handled. [...] certain product categories may also be found in the GMP Annexes. [...] In the meantime, for other products, manufacturers introducing a product into shared facilities should carry out an assessment of all relevant product and process characteristics to evaluate whether it is suitable for production in shared facilities. This assessment should include input from a toxicologist. [...]»

## *La linea-guida viene presentata come ...*

*10ppm or 1/1000 dosage criterion in the cleaning validation is not taking into consideration specific toxicological/pharmacological data.*

*Above approach is now abandoned for active substances for which a safe threshold level is known or can be established in favour of an approach that calculates the PDE (or ADE).*

*PDE determination is carried out substance-specific on the basis of all available toxicological and pharmacological data from clinical, preclinical or toxicological studies by means of NOEL.*

*PDE is derived by dividing the NOEL by various safety factors*

## *La linea-guida viene presentata come ...*

*NOEL x Weight Adjustment*

$$PDE = \frac{\text{-----}}{F1 \times F2 \times F3 \times F4 \times F5}$$

*From this approach are excluded active substance with a **GENOTOXIC** or **SENSITISING** potential*

*For active substances with a **genotoxic potential**, EMA refers to the Guideline «limits of Genotoxic Impurities» and to the TTC concept (Threshold of Toxicological Concern). A threshold of 1.5 microg/person/day is established for genotoxic impurities. In contrast to impurities intrinsic to production, residual active substance principally are avoidable and therefore the EMA sets a stricter limit dose of **0.15 microg/person/day**.*

*For **sensitising potential** for which no threshold values are known, point 3.6 of the updated EU GMP Guideline is valid which requires the use of **dedicated facilities**.*

## *La linea-guida viene presentata come ...*

*In cleaning validation practice this new way of determination of the threshold leads in most cases to less strict threshold compared to the 1/1000 dosage or the 10ppm criterion established so far.*

*Merely in those cases in which the critical affect is not the pharmaceutically desired effect, this can result in drastically stricter limits.*

# La Linea-guida (draft)

In order to accommodate a more scientific approach, Chapters 3 and 5 of the GMP guideline have been revised and refer to a «toxicological evaluation» for establishing threshold values for risk identification.

In case where scientific data does not support threshold values or where the risk cannot be adequately controlled by operational and/or technical measures, dedicated facilities are required for manufacturing these high risk medicinal products.

This guideline applies to all human and veterinary medicinal products, including investigational medicinal products, and all active substances that are intended for manufacture in premises used for the manufacture of other products or active substances.

# *Che calcolo applico se introduco un nuovo prodotto in impianto?*

Prodotto X:

NOEL = non disponibile

NOAEL = 1mg/kg/day, sul **ratto**, **short study**, non genotossico, non teratogeno

Calcolo PDE:

$$\text{PDE} = \frac{1\text{mg/kg/day} \times 60\text{kg}}{5 \times 10 \times 10 \times 1 \times 1} = 1.2 \text{ mg/day}$$

Calcolo residuo per ICH Q3C:

$$\text{ppm} = \frac{1000 \times 1.2\text{mg/day}}{10 \text{ g/day}} = 120\text{ppm}$$





## Considerazioni ... *dubbi...incertezze...*

- ❑ La linea-guida è applicabile a Investigational Medicinal Product.  
*Sono sempre disponibili valori sperimentali di NOEL/NOAEL/LOAEL?*
  
- ❑ Il limite 10ppm (o 1/1000th lowest clinical dose) non tiene conto dei dati farmacologici e tossicologici.  
*Qualora non siano disponibili in letteratura, vanno determinati sperimentalmente (NOEL?)*  
*Per prodotti in fase di sviluppo (innovator) è ancora applicabile l'approccio «non scientifico» dei 10ppm?*
  
- ❑ *Il fatto che il calcolo non preveda la valutazione del Batch Size, come impatta sulla mia attuale cleaning validation?*  
*I limiti di accettabilità sono ancora validi?*  
*Il worst case approach in essere è ancora valido?*

# Metodi di Calcolo per i Criteri di Accettazione utilizzati ad oggi

Esempio:

Prodotto A: TDD 20 mg BS 136kg

Prodotto B: LD50 400mg/kg (NOEL 14mg/Kg) BS 349kg

## MACO

Residuo di A ammesso in B:

$$\text{MACO} = \frac{\text{TDD1} \times \text{MBS}}{\text{SF} \times \text{TDD2}} = \frac{20\text{mg} \times 349000\text{g}}{1000 \times 14\text{mg}} = 499 \text{ g}$$

$$\text{ppm} = \frac{1000 \times 499\text{g}}{349\text{kg}} = 1430 \text{ ppm}$$

Residuo di B ammesso in A:

$$\text{MACO} = \frac{\text{TDD2} \times \text{MBS}}{\text{SF} \times \text{TDD1}} = \frac{14 \times 136000}{1000 \times 20} = 95 \text{ g}$$

$$\text{ppm} = \frac{1000 \times 95\text{g}}{136\text{kg}} = 699 \text{ ppm}$$

Policy aziendale limite 10ppm:

$$\begin{aligned} \text{MACO} &= \text{Max Conc} \times \text{min BS} \\ &= 10\text{ppm} \times 136\text{kg} \\ &= 1.36\text{g} \end{aligned}$$



*10 ppm nella maggior parte dei casi è più conservativo*

## ... ricalcolandoli come da Draft guideline & ICH Q3C ...

Serve almeno il NOEL sperimentale ...

Esempio:

Prodotto A: TDD 20 mg BS 136kg

Prodotto B: LD50 400mg/kg (NOEL 14mg/Kg) BS 349kg

### PDE

Prodotto A:

$$\text{PDE} = \frac{\text{NOEL} \times \text{Weight Adj}}{\text{F1} \times \text{F2} \times \text{F3} \times \text{F4} \times \text{F5}} = \frac{20\text{mg/kg/day} \times 60\text{kg}}{5 \times 10 \times 10 \times 1 \times 1} = 2.4\text{mg/day}$$

Prodotto B:

$$\text{PDE} = \frac{1\text{mg/kg/day} \times 60\text{kg}}{5 \times 10 \times 1 \times 1 \times 1} = 1.2\text{mg/day}$$

### ICH Q3C Option 1

Residuo ammesso (Prodotto A):

$$\text{Ppm} = \frac{1000 \times 2.4\text{mg/day}}{10\text{g/day}} = 240 \text{ ppm}$$

➤ **240ppm < 1430ppm con min BS**

Residuo ammesso (Prodotto B):

$$\text{Ppm} = \frac{1000 \times 1.2\text{mg/day}}{10\text{g/day}} = 120\text{ppm}$$

➤ **120 ppm < 699ppm con min BS**

## ... ricalcolandoli come da ICH Q3C ...

*quando è nota la max dose terapeutica è utilizzabile la ICH Q3C Option 2?*

Residuo ammesso Prodotto A:

$$\text{Ppm} = \frac{1000 \times 2.4\text{mg/day}}{0.02\text{g/day}} = 120000\text{ppm}$$

➤ **120000 ppm Option 2** > 240ppm Option 1 < 1430ppm con min BS

*Se il prodotto B è ad uso umano (raro) e veterinario, si utilizza la PDE / Dose terapeutica per l'uso umano?*

Residuo ammesso Prodotto B:

$$\text{Ppm} = \frac{1000 \times 0.01\text{mg/day}}{10\text{g/day}} = 1 \text{ ppm (opzione 1)}$$

$$\text{Ppm} = \frac{1000 \times 0.01\text{mg/day}}{0.6\text{g/day}} = 16.7 \text{ ppm (opzione 2)}$$

➤ **1 ppm** < 120ppm < 699ppm con min BS

➤ **16.7 ppm** < 120ppm < 699ppm con min BS

## *Considerazioni ... dubbi...incertezze...*

- ❑ *I metodi analitici impiegati per la cleaning validation dovranno avere elevata sensibilità. I limiti di quantificazione dovranno essere adeguati per un'accurata determinazione del residuo.*
  
- ❑ *Il worst case approach sarà da verificare (indipendente dal batch size)*
  
- ❑ *Il Risk Assessment dovrà tener conto di:*
  - *lay-out dell'impianto produttivo, la multifunzionalità delle attrezzature, spesso usate in step di processo differenti;*
  - *Molteplicità delle procedure di pulizia dovuta all'impiego di differenti solventi organici di lavaggio*
  - *Flusso e gestione dei materiali e del personale*
  - *Apparecchiature di grandi dimensioni*
  - *Razionale per la definizione dei punti di campionamento e recovery factor*