



PHARMSOL NEWS

NAVIGATING REGULATORY REQUIREMENTS FOR DRUG SUBSTANCES

JULY 2020 EDITION

PSNL/0012/07/2020



With a central focus on human safety, high quality standards for drug products are upheld worldwide through various drug agencies. In order to ensure that drug products intended for human use fulfil the safety needs of patients, regulatory approval must be granted before they make it to market.

Medicinal products can enter the market once a marketing authorisation (MA) has been granted by the relevant regulatory authorities. MA for a drug product must demonstrate robust evidence of efficacy, safety and quality of the drug product, which will be showcased in quality documentation on the active substance. Drug substance information will usually be placed in the section 3.2.S of the registration dossier of a drug product in an application or in a drug master file (DMF).

Another regulatory route for the API is through Certificate of Suitability (CEP) whereby CEP is compiled as per regulatory requirements and submitted to EDQM which is independent of finished product registration. However, this route is applicable only for the APIs in Ph Eur. In addition, standalone EU inspection of the API facility can be triggered by EDQM in specific cases either before or after the grant of CEP.

Drug substance regulatory documentation: key challenges

Control strategy and impurity profiling

There has been a growing interest in impurity profiling within the pharmaceutical industry. Following the recognition that trace level impurities can adversely affect both the safety and efficacy of the drug product, impurity profiling has subsequently gained significance in pharmaceutical product development.

The presence of these, has the potential to affect the efficacy and safety of pharmaceutical products hence based on the Critical Quality Attributes (CQAs) a control strategy must be devised specifically

Key Starting Materials (KSMs)

It's essential that drug substance synthesis is performed under Good Manufacturing Practice (GMP) conditions from the very first use of a defined starting material. The selection of KSMs and justifications of their designation in the DMF has become a central focus as a measure of mitigating regulatory risks as non-compliance of KSM manufacturer can lead to invalidation of the regulatory documentation for the API and hence the drug product.

The invalidation of regulatory documents by authorities due to GMP issues in KSM facility is well controlled & avoided with proper planning with selection mechanism for such outsourced KSMs.

Final thought

Regulatory documentation procedures for the filing of information on APIs in the context of a registration dossier differs from region to region hence it is important to prepare for the potential challenges and accordingly speed up the registration process.

Considering the complexities involved in regulatory submission, it is important to work with experts like PharmSol Group who are a pioneer in providing end to end services listed below;

- ***Custom synthesis & manufacturing of APIs***
- ***Conducting facility GMP assessment audit towards DMF/CEP filing & EU inspection***
- ***DMF, CEP review and / or compilations and submissions***
- ***Handling regulatory queries***
- ***Third party audits for APIs, Intermediates and KSMs***

Get in touch with our experts info@pharm-sol.com