4th PQRI Workshop on ICH Q3D Elemental Impurities Requirements 2020

Breakout Session #2

Impact of the Phase 2 Study on Industry and Regulators

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Impact of the Phase 2 Study on Industry and Regulators

Methods

- What are your immediate reactions to the Phase 2 Study results?
- What was outside of and/or missing from your standard lab practices?
  - Specific example: use of ammonia gas for analysis of V, etc
  - Did your lab make any changes to your own procedures?
- What total digestion/exhaustive extraction strategies are being used with respect to considering the extensive infrastructure and safety considerations?
  - How are you demonstrating equivalence between exhaustive extraction and total digestion methods?
- How do your internal SOP's for validation account for variability and address regulatory requirements for method development?

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Implications for compliance

- What are your immediate reactions to the Phase 2 Study results?
- How do these results make you think about method transfers, verifications, and other implications for daily activities?
- How might this influence your use of data for risk assessments and raw materials specifications?
- What level of error or uncertainty would represent a compelling indicator for adjusting analytical methods?
- How does your company/lab account for variability when the levels in your products begin to approach the PDE or control limit (e.g. additional steps)?

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Implications for compliance

- What are your immediate reactions to the Phase 2 Study results?
- Are comparable levels of analytical uncertainty and variability of results acceptable for risk assessment purposes as for routine release testing of products?
- What role do statisticians and analytical experts play in the development of risk assessments to account for potential uncertainties?
  - Is there a difference in developing risk assessments for finished products vs summation?
- Are the observations with respect to mercury recovery in tablets (i.e. loss over time) consistent with real-world products, and if so, what can be done to account for hold time?