Table 20: Considerations for Introducing Novel Excipients in DP Formulations, Across All Modalities

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Scope:

Novel excipients are used in the development of alternative routes of administration for special populations (e.g. pediatrics), drug delivery systems, and delivery of poorly soluble materials. There are significant challenges in the development of innovative excipients in the use of pharmaceutical formulations. This is partly due to the large amount of additional data required for regulatory approval in a format that is similar to that submitted for the API. In addition, the generated novel excipient data contains commercially sensitive and proprietary details, and therefore not publicly available to support other uses by the scientific/drug development community.

In recognition of these challenges and in an effort to speed up innovation, the FDA introduced the Novel Excipient Review Pilot Program in order to foster development of novel excipients. This is a new pathway for excipient manufacturers to obtain FDA review of certain novel excipients prior to their use in drug formulation. This would allow companies to know if a new excipient was acceptable from a regulatory perspective without running the risk of an IND/NDA/BLA being rejected or delayed because of questions over a novel excipient. The pilot will consist of a two-part selection process to occur over a two-year period. Two proposals will be selected per year to proceed through the program based on several criteria with full toxicology and quality information to be submitted in the second stage of the program.

During this roundtable, we hope to discuss the innovative approaches for use of novel excipients as well as development challenges for use of novel excipients including the regulatory review / approval process, quality information and toxicology studies.

Questions for Discussion:

1. What are challenges with novel excipient toxicology studies?
2. Concerning the FDA pilot program: What are some considerations that need to be taken into account for the FDA pilot program? Specifically in terms of the supporting information that is needed. What improvements would you like to see from the FDA pilot program? What are the key decision-making factors that will determine whether you choose to participate in this program?
3. Based on the FDA pilot program safety data which needs to be demonstrated in the proposed formulation, what are the impacts to development timelines and studies?

4. At what stage of development should you start collecting the required safety / toxicology data?

Discussion Notes:

Reviewed the FDA Novel Excipient Pilot Program and discussed the program.

- Not sure what it means by the full data package
- Roundtable expressed that it was difficult to see the incentive of the program for the Sponsor. Especially if pre submitting the full data package.
- Possibly might not work well because of the excipient manufacturers

Also discussed in general characterization of raw materials.

- Looking for better control of raw materials / degradation over time
- Current approach is to rely on the C of A of raw materials
- Part of the initiative is to ask the USP more from the suppliers and force additional information from the raw material companies as crucial information is missing

Discussed with S the procedure in Peru

- HA will take into account the guidances from other HAs such as FDA/ EMA/ Health Canada