

Continuous manufacturing experiences from regulatory perspectives in Japan

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Introduction of PMDA



Headquarters, Tokyo

- Name : Pharmaceuticals and Medical Devices Agency
- Date of Establishment : In April 2004
- Established as an Incorporated Administrative Agency



Kansai branch



Hokuriku branch

https://www.pmda.go.jp/english/index.html



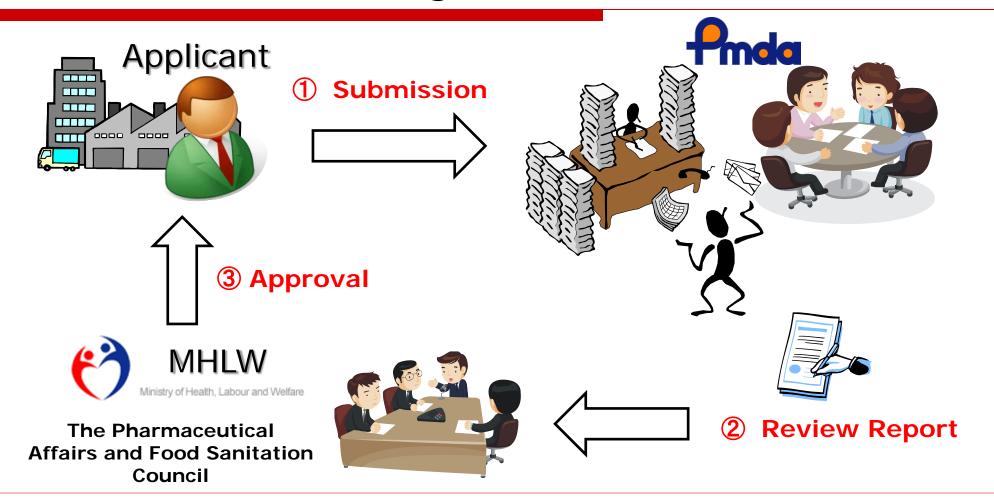
Regulatory authorities for drugs and medical devices

 PMDA Pmda	 MHLW
Scientific review for drugs and medical devices	Authorization of applications Publication of guidelines
Consultation on clinical trials etc.	Supervision of PMDA activities
Inspection (GCP, GLP, GMP, QMS etc.)	
Supporting MHLW's activities	

PMDA: Pharmaceuticals and Medical Devices Agency MHLW: Ministry of Health, Labour and Welfare

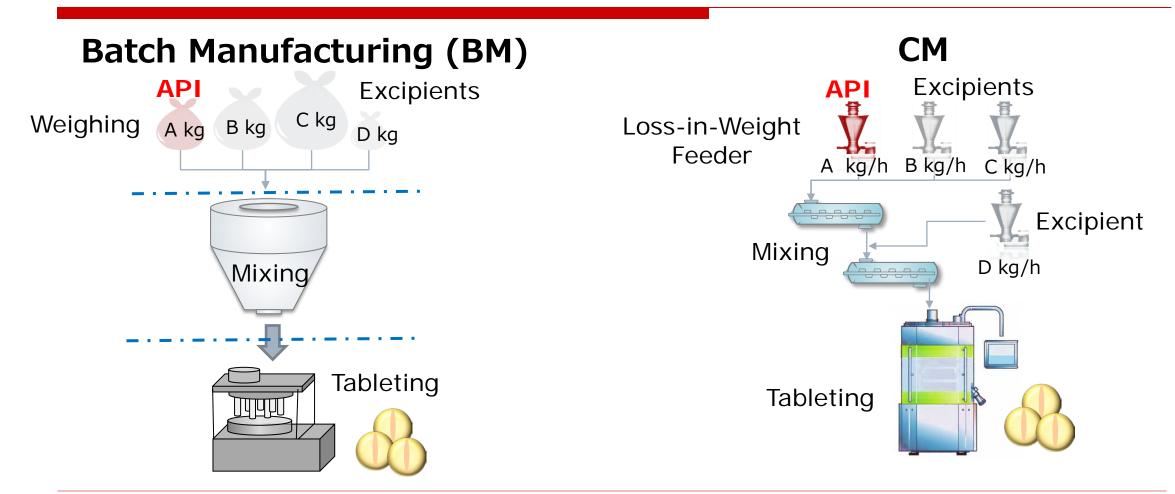


Flowchart of Reviewing Process





What is continuous manufacturing (CM)?





Why is CM drawing attention?

□ Are there any problems with conventional BM?

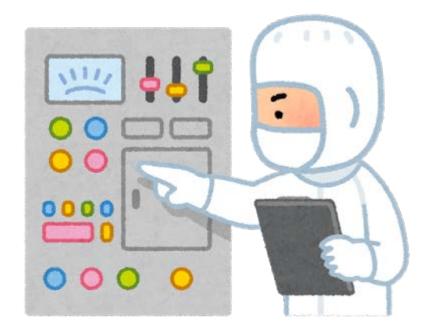
- □ There is nothing wrong with BM, which should remain one of the manufacturing methods to be used in the future.
- □ However, CM may offer us what is challenging to achieve with BM.



Expectations for CM

- □ Flexible manufacturing
 - Production in response to demand
- Detectability of poor-quality products
 - Prevention of drug shortage problems
- Prevention of waste
 - Promotion of Green chemistry
 - Cost reduction

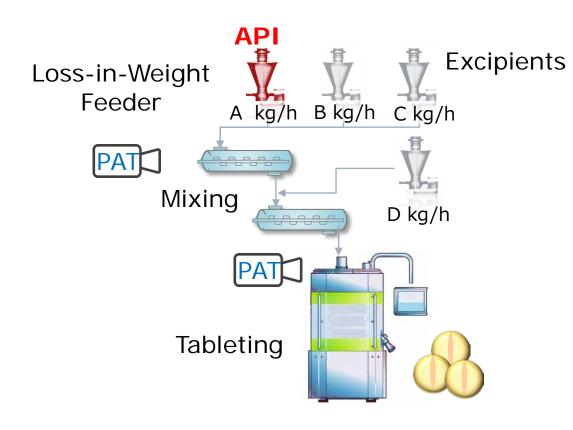
and so on



CM offers us a wider choice of manufacturing methods



What is the difference in control strategy between BM and CM?



In CM, fluctuations in the upstream process directly affect the downstream process, so more integrated system management is required compared to conventional BM.



How to control CM specific matters?

- □ CM specific matters
 - Equipment design and system integration
 - Material traceability
 - Process dynamics, etc.



- Controls
 - Traditional off-line testing
 - Models
 - NIRS (Chemometric models)
 - Process models (Mechanistic models)
 - Multivariate Statistical Process Control (MSPC), etc.



Specialized teams for CM at the EMA, FDA and PMDA

- - Process Analytical Technology (PAT) team
- US FDA
 - Emerging Technology Team (ETT)
- - Innovative Manufacturing Technology Working Group (IMT-WG)
 - AMED research group for small molecule
 - □ Study on quality assurance of pharmaceutical CM
 - AMED research group for large molecule
 - Study on quality control strategies for the practical application of CM of biopharmaceuticals

AMED: Japan Agency for Medical Research and Development



PMDA's Milestones

- PMDA IMT-WG
 - PMDA Views on Applying Continuous Manufacturing to Pharmaceutical Products for Industry (provisional draft)

https://www.pmda.go.jp/rs-std-jp/standards-development/cross-sectional-project/0018.html

- □ AMED research group
 - Document: "Points to Consider Regarding Continuous Manufacturing"

http://www.nihs.go.jp/drug/section3/AMED_CM_PtC.pdf

Document: "State of Control in Continuous Pharmaceutical Manufacturing"

http://www.nihs.go.jp/drug/section3/AMED_CM_CONTROLST.pdf

Approach to establishment of control strategy for oral solid dosage forms using continuous manufacturing

Chemical and Pharmaceutical Bulletin 69(2), 211-217, 2021

Control strategy and methods for continuous direct compression processes

Asian Journal of Pharmaceutical Sciences 16, 253-262, 2021

State of Control

State of control means a condition in which a change remains within the control range under the predetermined control even if the condition changes over time due to the fluctuation of external factors.

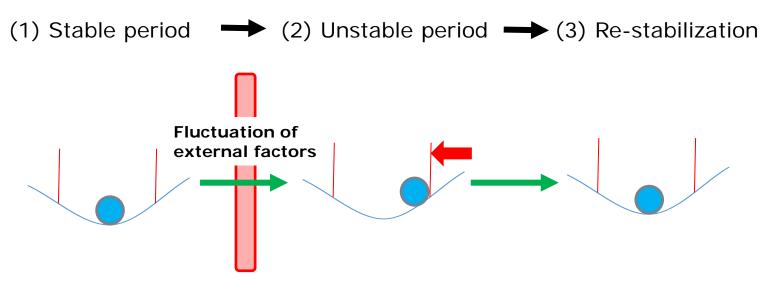
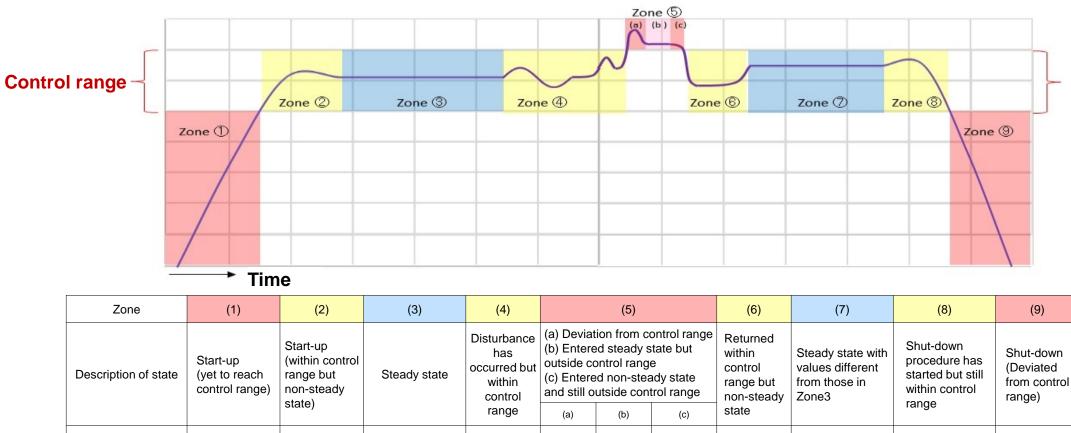


Figure : Conceptual diagram depicting the State of Control (Note: The red belt indicates the control range and the red arrow indicates the designed control.)

Reference: http://www.nihs.go.jp/drug/section3/AMED_CM_CONTROLST.pdf



Concept of the Relation between "Steady State" and "State of Control"



Steady state	N	N	Y	Ν	Ν	Y	Ν	Ν	Y	N	N	
State of control	Ν	Y	Y	Y	N	N	N	Y	Y	Y	N	
Discharge outside the system	Y	Y/N	Ν	Y/N	Y	Y	Y	Y/N	N	Y/N	Y	
(Y: Yes, N: No, Y/N: Yes or No) Reference: http://www.nihs.go.jp/drug/section3/AMED_CM_CONTROLST.pdf												

Training on Continuous Manufacturing

Q: Does demonstrating "Steady State" assure "State of Control" in CM?

Even if steady state is maintained, since the operation may be implemented outside of the control range for quality assurance, maintaining "Steady State" does not necessarily guarantee "State of Control". It is necessary to guarantee that the operation is maintained within the control range of preset targeted values/set values by following the predefined control strategy. Although "Steady State" is not a requirement for assuring "State of Control", maintaining steady state where the operation is kept under control more easily is considered to be a desirable condition.

Reference: http://www.nihs.go.jp/drug/section3/AMED_CM_CONTROLST.pdf



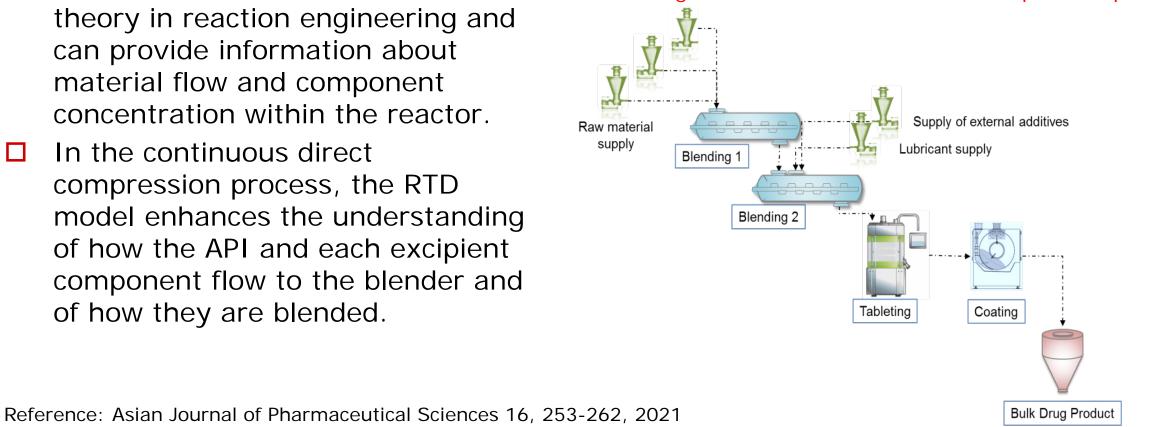
Q: Is it possible to guarantee "State of Control" if variables subject to control are verified within the control range in CM where "Steady State" is not achieved?

It would be theoretically possible to guarantee "State of Control" if variables subject to control are verified within the control range and robustness during the process of changes is demonstrated despite the unsteady state. Nevertheless, we should keep in mind that unsteady state has multiple technical problems including the difficulty in establishing an RTD model.

Reference: http://www.nihs.go.jp/drug/section3/AMED_CM_CONTROLST.pdf

An Example of a Process Model: Residence Time Distribution (RTD) model

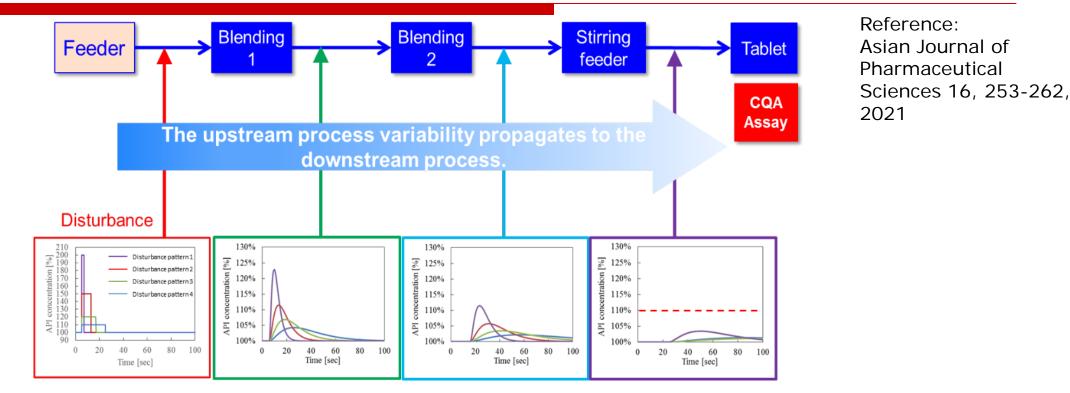
- The RTD model is a well-known theory in reaction engineering and can provide information about material flow and component concentration within the reactor.
- In the continuous direct П compression process, the RTD model enhances the understanding of how the API and each excipient component flow to the blender and of how they are blended.



Schematic diagram of the continuous direct compression process

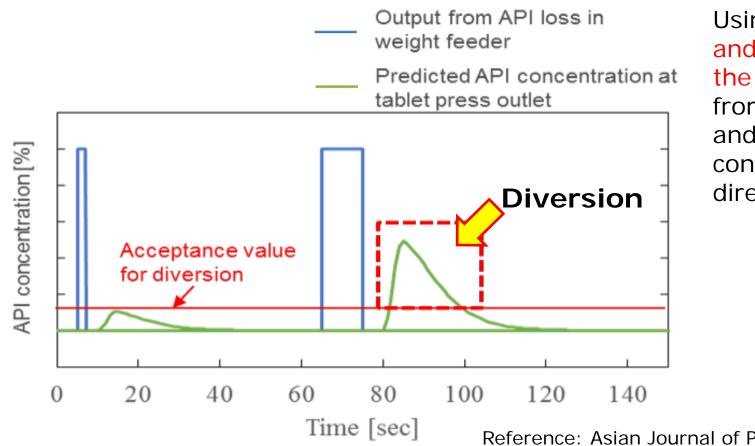


Variations of the Loss-In-Weight (LIW) feeder and a step-by-step image of each process



It is possible to predict how the variation caused by the LIW feeder continues the process, how it affects the quality of the final drug product, and how to set the acceptable range of variation of the LIW feeder.

A process control image based on the API concentration predicted by RTD



Using the RTD model, the magnitude and length of acceptable variation of the LIW feeder can be established from its impact on the CQA of Assay and can be incorporated into the control strategy of the continuous direct compression process.



Reference: Asian Journal of Pharmaceutical Sciences 16, 253-262, 2021

PMDA Experiences with CM

- □ Some CM products have approved in Japan.
 - Eli Lilly: Verzenio® Tablets (abemaciclib) 50mg, 100g, and 150mg
 - Janssen Pharmaceutical K.K.: Tramcet® Combination Tablets (tramadol hydrochloride, acetaminophen)
 - GSK: Duvroq® Tablets (daprodustat) 1mg, 2mg, 4mg, 6mg
 - Eisai: Tazverik® Tablets (tazemetostat) 200mg
 - Shionogi: Xofluza® Tablets (baloxavir marboxil) 10mg, 20mg
 - Pfizer: Cibinqo ® Tablets (abrocitinib) 50mg, 100mg, 200mg

 - :



Example case of Approval in Japan(1)

	Pharmaceuticals a	医薬品医療機器総合 and Medical Devices Age	茂伟 ency		文字 サイズ	標準 大 特力
一般名			アベマシクリフ	r		
販売名	製造販売業者等	添付文書	患者向医薬品ガイド/ IF/くすりのしおり	RMP	RMP資 医療従事者向け	i材 患者向け
ページニオ錠 50mg/ページニ 		<u>PDF(2020年04月27</u> 日) / <u>HTML</u>	患者向医薬品ガイド G ページニオ錠50mg/ ページニオ錠100mg/ ページニオ錠150mg インタビューフォーム F1 ページニオ錠50mg /ページニオ錠50mg /ページニオ錠50mg /ページニオ錠50mg くすりのしおり一覧	Q	医唇間低差の方へ一	<u>、-ジニオ錠を別</u> 目される患者さ
重篤副作用疾患別 応マニュアル	対 無類粒球症(類和 症、好中球減少症 間質性肺炎		<u>南小板减少</u>	<u>>症</u>	重度の下痢	Ī
承認情報 公知申請への該当 性に係る報告書 最適使用推進GL	承認年月日等 2018年09月21日	報告書	申請資料概要		備考 モン受容体陽性かつH 又は再発乳癌を効能效	

https://www.pmda.go.jp/PmdaSearch/iyakuDetail /GeneralList/4291054



Example case of Approval in Japan(2)

2.2.2 製造方法

製剤は、予混合工程、LIW フィーダーからの予混合末、原薬及び添加剤の供給工程、混合工程、打錠 工程、コーティング工程並びに包装・表示工程により製造される。なお、 工程に、工程管理項目及 び工程管理値が設定されている。

QbD の手法を利用し、以下の検討等により、品質の管理戦略が構築されている(表3)。

- CQA の特定。
- 品質リスクアセスメント及び実験計画法に基づく CPP の特定。
- LIW フィーダーからの予混合末、原薬及び添加剤の供給工程、混合工程並びに打錠工程における連続生産技術の導入。
- 製剤均一性に対する RTRT の適用。

In this case example, continuous manufacturing technology is used in the feeding, mixing and tableting process.



Example case of Approval in Japan(3)

①LIW フィーダーからの予混合末、原薬及び添加剤の供給工程、②混合工程、並びに③打錠工程において連続生産技術が導入されている。機構は、製剤の品質管理戦略について説明を求め、申請者は、上記①~③に関してそれぞれ下記の管理等により、連続生産において製剤の品質を恒常的に担保する旨を回答した。

①:

- 稼働中に生じる変動(の))) しましんの) しましんでの しましんで () にない ()

The feeding speed of each raw material has been strictly controlled to maintain the composition ratio of the formulation.



Example case of Approval in Japan(4)

2:

水平型連続混合機の内部に撹拌装置を組み込む。攪拌装置の軸に取り付けられているのの及びでは、
 びていたり軸が回転すると粉末がの及びでし、このではより回転軸に沿った粉体の

及び が生じ、 からの にばらつきが生じた場合であっても、混合末の組成比を平準化することが可能である。

- 粉体が水平型連続混合機に入ると、その入った粉体の測定が連続的にモニターされ、混合機の 上流又は下流におけるを検知し、限度値を超えた場合には装置の稼働を停止する。
- のののですのばらつきによる影響を軽減し、打錠機への混合末の供給が枯渇することを防止するため、サージホッパー¹⁾には
 たてん量を連続的にモニターする。

The mixing equipment has also implemented a different control to maintain the composition ratio of the formulation.



Example case of Approval in Japan(5)

- 3:
- 打錠機内にある撹拌フィードシューに
 を設置し、打錠
 の
 中の原薬<
 濃度を測定する。

The concentration of the API is measured; and any API deviated from the control value is discharged from the system.

Example case of Approval in Japan(1)



Reference:

https://www.pmda.go.jp/drugs/2021/ P20211011001/672212000_30300AM X00443_A100_1.pdf

Example case of Approval in Japan(2)

2.2.2 製造方法

製剤は原料供給、混合、打錠、フィルムコーティング及び包装・表示からなる工程により製造され、 原料供給から打錠までは連続生産技術により連続的に、その後のフィルムコーティング工程ではバッチ 式で製造される。なお、 ここの 及び ここ 工程が重要工程とされ、工程管理項目及び工程管理値 クオリティ・バイ・デザインの手法を利用し、以下の検討等により、品質の管理戦略が構築されてい る(表 3)。

- 重要品質特性の特定
- 品質リスクアセスメント、実験計画法に基づく重要工程パラメータの特定
- NIR と SS の混成法によるリアルタイムモニタリング
- In this example case, continuous manufacturing technology is used in the LIW feeding and tableting process.
- A real-time monitoring system consisting of a hybrid Near of InfraRed-Soft Sensor (NIR-SS) IPC

Example case of Approval in Japan(3)

2.R.1 製剤の製造管理について

申請者は、連続的な工程を含めた製剤の均質な製造についての管理戦略は、以下の要素から構成されていると説明している。

- ② 原料ごとの 供給装置の モニタリングによる、連続混合機への 速度及 び 割合の制御(リアルタイム)
- ③ 連続混合機内の混合末の 制御に基づく混合均一性の確保(リアルタイム)
- ④ モデル(②の 速度及び③の 設定値に基づく 濃度推定)による、混合機
 から排出される混合末中の 濃度の管理(リアルタイム)
- ⑤ の混合末の NIR-SS 混成法による、原薬含量値のリアルタイムモニタリング及び不適合となる錠剤の除外(NIR が使用不可能な場合には、製造時間全体に亘り定期的にサンプリングした素錠のオフライン検査で含量及び製剤均一性を確認する)
- ⑥ 製造時間全体にわたり定期的にサンプリングした素錠の 及び が設定範囲内であることの確認(オフライン)
- ⑦ フィルムコーティング後の製剤についての出荷判定試験(オフライン)

- Controlling parameter A speed and ingredient B mass balance of components into the continuous mixing equipment (RT)
- Ensuring uniformity of dosage units of the mixed powder in the continuous mixing equipment by controlling factor C (RT)
- RT monitoring of the drug substance concentration of the mixed powder by the hybrid NIR-SS model and diverting non-conforming material

Example case of Approval in Japan(4)

- 2.R.2 NIR-SS 混成法の使用について
- 製剤製造の均一性を管理するための の 含量モニタリングには、NIR の モデルをその まま使用するのではなく、供給装置の や混合機の 等の工程パラメータを入力変数として
 - モデルに基づく含量推定を行う SS を混成させた、NIR-SS 混成法が使用されている。
 - 申請者は、NIR-SS 混成法を用いる点について、以下のように説明している。
- NIR に SS を混成する理由として、NIR の デデルは、原料ロット等がモデルの頑健性に影響を及 ぼし、結果として推定値に偏りが生じる可能性があるが、SS は入力変数による デルであるため、 NIR において推定値に偏りを生じさせる因子の影響は受けず、混成の結果、より頑健な測定結果が得ら れると考えられる。
- Utilize the Hybrid NIR-SS model which performs content estimation. This model consists of NIR and process parameters of LIW feeders and mixing equipment.
- The SS is not affected by factors that bias estimates in NIR.



ICH Q13

Continuous Manufacturing of Drug Substances and Drug Products

- Rapporteur: Dr. Sau (Larry) Lee (FDA, US)
- Regulatory Chair: Dr. Yoshihiro Matsuda (MHLW/PMDA)
 - o ANVISA, Brazil
 - o BIO
 - o EC, Europe
 - o EFPIA
 - o FDA, US
 - Health Canada, Canada
 - HSA, Singapore
 - o IGBA
 - o JPMA
 - MFDS, Republic of Korea
 - o MHLW/PMDA, Japan
 - o NMPA, China

- o PhRMA
- o Swissmedic, Switzerland
- o TFDA, Chinese Taipei
- o IFPMA
- o APIC
- o IPEC
- National Center, Kazakhstan
- o USP
- o PIC/S
- o EDQM





Current Status

- July, 2021: Step1 sign-off & Step2a/2b endorsement
- July, 2021 ~ December, 2021:
 Regional Consultations
- November, 2022: Step4



INTERNATIONAL COUNCIL FOR HARMONISATION OF TECHNICAL REQUIREMENTS FOR PHARMACEUTICALS FOR HUMAN USE

ICH HARMONISED GUIDELINE

CONTINUOUS MANUFACTURING OF DRUG SUBSTANCES AND DRUG PRODUCTS Q13

> Draft version Endorsed on 27 July 2021 Currently under public consultation



Expectations in the future

- CM can potentially be a standard of drug manufacturing in the pharmaceutical industry.
 - Many regulatory agencies, including PMDA and US FDA, strongly support the implementation of CM technology.
 - CM is the necessary technology to realize Industry 4.0(a concept given to the current trend of automation and data exchange in manufacturing technologies)
 - CM can innovate the manufacturing and distribution of pharmaceuticals.

CM will be a benefit for everyone.



How to stay up to date with PMDA

Regulatory Science/The Science Board/Standard Development	Innovative Manufacturing Technology WG (IMT-WG)
Regulatory Science	Activities
Dutline	As QbD (Quality by Design*)-based approaches are being widely adopted in pharmaceutical
Recent Publications by PMDA Staffs	development, manufacturing and control, emerging technologies are being increasingly introduced into pharmaceutical manufacturing.
Recent Presentation by PMDA Staffs	The purpose of this WG is to discuss regulatory issues related to quality assessment and GMP inspection to facilitate the introduction of innovative manufacturing technologies while ensuring appropriate quality.
Regulatory Science Research in PMDA	Continuous manufacturing is our primary target.
■ Projects Across Multi- Offices in PMDA	* Quality by Design; A systematic approach to development that begins with predefined objectives and emphasizes product and process understanding and process control, based on sound science and quality risk management.
<u>The Science Board</u>	
<u>Standard Development</u>	Established

July, 2016

Members

Office of New Drug I-V (Quality) Office of Cellular and Tissue-based Products Office of Generic Drugs Office of Manufacturing/Quality and Compliance Office of Research Promotion

Document

PMDA Views on Applying Continuous Manufacturing to Pharmaceutical Products for Industry (provisional draft).(Mar. 30, 2018)

Past Presentations

This website will provide compiled information on domestic regulations applicable to pharmaceutical CM including:

- Presentation files
- Regulatory documents, etc.

https://www.pmda.go.jp/english/rs-sb-std/rs/0012.html

Thank you for your attention

