

## 1 **How to apply the Japanese Pharmacopoeia** 2 **according to the purpose <GZ-4-190>**

3 (目的に応じた日本薬局方の適用方法)

4 The JP is an official document that defines the specifica-  
5 tions, criteria and standard test methods necessary to properly  
6 assure the quality of drugs in Japan. Furthermore, it is a sci-  
7 entific document that publicly discloses test methods used  
8 during drug development and approval applications, at qual-  
9 ity control sites such as pharmaceutical companies and phar-  
10 macies, at public testing institutions, and in pharmaceutical  
11 education, as well as the internationally promoted concept of  
12 quality control. In addition, it aims to include all important  
13 drugs in healthcare, and contains drugs at various stages in  
14 the drug life cycle.

15 Since the JP is an official document, it contains the speci-  
16 fications, criteria and standard test methods for assuring them.  
17 The monographs of the JP contain not only drug substances  
18 but also drug products, but the time of listing varies. Specifi-  
19 cations and criteria are established based on the concept of  
20 quality assurance at the time of listing, as well as test methods  
21 for them. For example, specifications, criteria and test meth-  
22 ods are specified for description, identification, purity, water  
23 content, residue on ignition, assay, storage, etc., for a drug  
24 substance, and specifications, criteria and test methods for  
25 manufacture, identification, uniformity of dosage units, dis-  
26 solution, assay and storage, etc., are specified for its drug  
27 product. When a JP reference standard is not specified for a  
28 drug substance, quantitative tests for its drug product may be  
29 specified to be performed using the drug substance itself. In  
30 such cases, the drug substance that has the content of the in-  
31 gredient above a certain level is specified as XX for assay in  
32 Reagents, Test Solutions <9.41>, and used for quantitative  
33 tests of its drug product. This provision is based on the prem-  
34 ise that main testing sites are pharmaceutical companies that  
35 can easily obtain the drug substance meeting the specification  
36 of the JP. However, when a drug product is tested by a public  
37 testing institution, it may be difficult to obtain the drug sub-  
38 stance meeting the specification of the JP. In this case, a com-  
39 mercially available reagent is used as a substitute for the drug  
40 substance, and the tests specified in the JP are performed to  
41 confirm that this reagent meets the specifications of the drug  
42 substance.

43 In such cases, to what extent should the reagent that re-  
44 places the drug substance be tested? In the JP, it is important  
45 to perform tests according to the fit for purpose. Therefore,  
46 for example, if a drug substance is designated as a reference  
47 material in an identification test of a drug product and a com-  
48 mercially available reagent replaces it, identification tests of  
49 the drug substance are performed to confirm that the reagent  
50 has certainly the same structure as the drug substance. If the

51 identification test for the drug product is specified, for exam-  
52 ple, by thin-layer chromatography or liquid chromatography  
53 using the drug substance, it is not necessary to perform the  
54 purity tests, residue on ignition test, assay test, etc., specified  
55 for the drug substance.

56 Then, what if a commercially available reagent is used as  
57 a substitute for a drug substance for quantitation of its prod-  
58 uct? It is necessary to confirm that the reagent has certainly  
59 the same structure as the drug substance in some way, and  
60 then to confirm that the reagent meets requirements of XX  
61 for assay by performing the assay of the drug substance. In  
62 this case, if calculation on the anhydrous basis is necessary,  
63 the water content should also be measured. In other words, if  
64 a reagent is used instead of a drug substance to perform quan-  
65 titative tests of a drug product, the tests required for the drug  
66 substance such as purity tests and residue on ignition test do  
67 not affect the quantitative value of the drug product in most  
68 cases. If this is clear, it is not necessary to perform these tests  
69 according to the fit for purpose. Similarly, when a drug sub-  
70 stance is used in a quantitative test using liquid chromatog-  
71 raphy to confirm the system performance and is substituted  
72 by a commercially available reagent, it is only necessary to  
73 confirm that the reagent has the same structure as the drug  
74 substance, considering its purpose.

75 Thus, when performing the tests in the JP, it is important  
76 to consider the essential of the tests and it is considered pos-  
77 sible to apply the necessary tests according to the purpose. If,  
78 as a result of careful consideration of the essential of tests,  
79 the application of the test method of the JP is changed, it is  
80 necessary to be able to provide a rational explanation for the  
81 appropriateness of the change. Furthermore, in the manufac-  
82 ture of drugs, changes should be made only within the scope  
83 that ensures the quality of drugs.