

SUMMARY MINUTES
of the
BRITISH PHARMACOPOEIA COMMISSION

A meeting of the British Pharmacopoeia Commission was held via videoconference on Monday 4th November 2024.

Present: Dr A M Brady (*Chair*), Dr E Amirak, Dr E Bush, Mr C E Giartosio, Mrs H Hall (Lay member), Dr V Jaitely, Mr S Jones, Dr O Kavanagh, Dr M Lane, Mr R Lowe (*Vice-Chair*), Dr P Marshall, Ms C Nicholson (Lay member), Professor Y Perrie (*absent for items discussed under minutes 703 to 707.4*), Mr J Rickard, Professor M Simmonds (*absent for items discussed after minute 719*).

In Attendance: Mr S Hoare (Secretary and Scientific Director), Mr P Crowley, Dr C Swann, Mr K Rakowski.

Also present: Dr B Bahsoun, Ms S Begum, Ms S Bowles, Ms H Corns, Dr M Dmitriieva, Ms R Feltham, Mr R Legg, Ms G Li-Ship, Ms A Peabody, Mr O Waddington, Mr M Whaley, and Mr S Young.

703 Introductory Remarks

Welcome The Chair welcomed members to the meeting and extended her welcome to Dr Bahsoun (12 months fixed term), Mr Legg and Ms Feltham (6 months fixed terms), and Ms Pebody (fast streamer at BP for 12 months placement) who had recently joined the BP Secretariat team.

Confidentiality of Proceedings Members were reminded of the confidential nature of the meeting and that the papers and minutes should not be disclosed.

Declaration of Interests Members were reminded of the need to declare any specific interests at the start of relevant discussions. Any changes to interests throughout the year should be sent to committeeserviceteam@mhra.gov.uk.

Fees and expenses Members were asked to submit any claims for fees and expenses to committeeserviceteam@mhra.gov.uk, clearly indicating the meeting to which they referred.

I MINUTES

704 The minutes and summary minutes of the meeting held on 1st July 2024 were accepted, subject to minor editorial comments.

II MATTERS ARISING FROM THE MINUTES

705 The following matters arising from the meeting held on 1st July 2024 were noted.

Minute 682 – Alkyl Sulfonate Ester Impurities The Secretariat received additional correspondence informing the BPC about a journal article that offers an alternative perspective on the Ph. Eur. and the BP's production statements regarding alkyl sulfonate impurities.

Minute 682 – Branded vs Generic Products Comprehensive details had previously been provided on an article discussing the impacts of switching between specific branded and generic medications for Parkinson's disease. The Safety and Surveillance group had reviewed the signals in August and found no issues in the Yellow Card reports from March and April that required escalation. Therefore, no further action was needed.

Minute 682 – Observer discussions The Secretariat were to develop a policy on stakeholders observing Commission meetings, the outcome of which would be brought to a future meeting.

Minute 682 – BP Ways of Working Following on from workshops with EAG chairs, the Secretariat was to set a suitable date for a workshop with the BP Commission on BP Ways of Working.

Minute 682 – Sustainability The Secretariat was to explore the interchangeability of carrier gases used in GC analysis, and an annual sustainability update was to be presented at the Commission meeting in March. An interest in this area was noted, and it was agreed to follow up on it.

Minute 682 – Horizon Scanning The Secretariat were considering members' comments and aimed to bring a horizon scanning process to a future meeting.

Minute 682 – Falsified medicines proposal The proposal was still under evaluation due to competing priorities and available resources, and an update would be provided at a future meeting.

Minute 682 – Bacterial Endotoxin Update The Secretariat discussed the potential for high endotoxin limits with representatives from the Ph. Eur. BET expert group and Group 12. The request for revision was sent to EDQM groups 12 and BET WP. Group 12 discussed the request and deferred the decision to the BET WP, which had yet to meet.

Minute 688 – Multi-Attribute Method (MAM) by Mass Spectrometry as a QC Release and Stability Tool The topic of MAM methods had been presented to the October meeting of EAG BIO, the outcome of which was detailed in their minutes.

Minute 689 – Revision of ICH guidelines The Secretariat had been engaged in discussions regarding ICH Q6 which referenced Pharmacopoeial specifications. Further updates regarding updated to ICH Q1 or Q6 would be provided at a future meeting.

III REPORTS AND CORRESPONDENCE

GOVERNANCE

706 Update from the Secretary & Scientific Director

Mr Hoare provided an update on key activities and personnel changes for the MHRA.

OPERATIONAL

- 707 **BP&LS Strategy – Implementation Update** COM(24)33

Mr Crowley provided an update on the implementation of the strategy for the British Pharmacopoeia and Laboratory Services.

- 708 **British Pharmacopoeia Commission: Membership** COM(24)34

Reappointments Three BP Commissioners whose terms expired on June 21st had been reappointed, effective from June 22nd 2024.

- 709 **British Pharmacopoeia Laboratory** COM(24)35

British Pharmacopoeia Laboratory Reports The list reports concerning new and revised monograph that had been prepared by the Laboratory since July was provided for information.

British Pharmacopoeia Chemical Reference Substances Tables providing information on BPCRS up to the end of September 2024 were provided for information.

IV FUTURE PUBLICATIONS

- 710 **BP Continuous Improvement** COM(24)36

Members were informed that the BP's publisher had delivered several website enhancements which fulfilled part of the contractual requirement to develop a new website.

The findings of customer research undertaken in September 2024 were presented for information.

Continuous improvement initiatives had identified priorities for the next six months, with additional initiatives identified for the following year and two years. Initiatives would be added to the continuous improvement project plan, or amended, based on insights generated from research, such as customer surveys.

Initiatives for the first six months included: improving the document review tool; improved website search function; reassessing pricing and format packages.

- 711 **Priority Work Programme** COM(24)37

Background Significant progress had been made on the monographs prioritised in 2021, with only a small number of new monographs yet to be started. A new priority work programme was being developed to take account of the most up to date medicine usage data.

Priority work programme scoring framework A proposed priority rating for EAG workloads was presented, incorporating critical medicines information and usage data. Additional factors for prioritisation were suggested, including treatments for significant health conditions, lifesaving treatments, first generics pipeline, and monograph

harmonisation projects. Members discussed focusing on special populations, national shortages data, and antimicrobials. They also highlighted the importance of obtaining over-the-counter medicine data and targeting small molecule medicines for cost savings.

Scoring framework implementation The scoring framework was to be applied to prioritise new monographs and existing monographs and was expected to support promotion of new drug substance monographs, as well as continuous improvement of published monographs. The importance of metrics that reflects the value to taxpayers and patients, rather than just the number of new monographs, and considering revisions and continuous improvement metrics was emphasised.

V ANALYTICAL ISSUES

712 Updated dissolution text for Aide Memoire COM(24)38

The Secretariat presented an updated proposal on dissolution limits, incorporating feedback on Biopharmaceutics Classification System (BCS) classifications, registered limits, and product formulation. It was suggested to consider dissolution profile testing when data was inconsistent, citing issues with levothyroxine, and to exclude outliers. Additionally, it was recommended to replace "batch data" with "stability data" to better align with product stability assessment. Both points were endorsed by members for inclusion in the Aide Memoire.

713 Peak separation system suitability tests for chromatographic methods COM(24)39

Background Discussions at Expert Advisory Group (EAG) MC2 on the general requirement for peak separation system suitability tests (SSTs) in chromatographic methods within BP monographs had led to a request for clearer guidance on this from BP Commission.

Current Requirement All chromatographic tests are required to comply with Appendix III which contains system suitability requirements, and these are not reproduced within each individual monograph. Any SST included in a BP monograph was additional to those in Appendix III, or to provide an exception to the general requirement. There was limited guidance within the Aide Memoire and Policy List regarding when peak separation SSTs for chromatographic methods should be employed, but it was to be considered early in a monographs development and harmonised with those in the dissolution and Assay procedures.

Discussion and Recommendations EAG MC2 members emphasised the importance of peak separation for impurity control in related substances tests but deemed a peak separation SST unnecessary for Assays without closely eluting peaks. For dissolution tests, they found the peak separation requirement excessive due to the acceptability of UV-VIS spectrophotometry. The Secretariat's proposal for the Aide Memoire was endorsed, and members agreed on the need for educational initiatives to clarify compliance with Appendix requirements not included in product monographs.

VI EXPERT ADVISORY GROUPS / PANELS OF EXPERTS

714 EAG Memberships COM(24)40

The Secretariat were working with the seven new British Pharmacopoeia Commission members to identify Expert Advisory Groups (EAGs), Panels of Experts, and Working Parties that would be most beneficial of their support, from which Dr Halliday had agreed to join EAG ULM.

Two individuals had been identified for appointment to Panel RAD, a returning member with expertise in PET imaging and radiopharmaceutical production and an expert with significant expertise in GMP-compliant environment and regulatory roles. Both appointments were supported by the Panel RAD chair and endorsed by the Commission.

715 Expert Advisory Group MC2: Medicinal Chemicals COM(24)41

The report of the EAG MC2 meeting (12:06:24) was endorsed and the following points were raised.

It was noted that the example of the scaled method for the BP 2025 Solifenacin Oral Suspension monographs had been finalised and published as a case study.

Mirabegron Prolonged-release Tablets A dual wavelength approach had been adopted for Impurity B in the related substances due to an excessive correction factor.

716 Expert Advisory Group ULM: Unlicensed Medicines COM(24)42

The report of the EAG ULM meeting (24:06:24) was endorsed and the following points were raised.

Work Programme The group had identified injectable formulations, particularly in chemotherapy and neonatal medicine, as a priority area. The focus had shifted away from crushed tablet-based oral liquid formulations to better align with the NHS.

Lansoprazole Oral Suspension Discussions focused on using an alkaline base to stabilise the suspension. Members proposed including the term “alkaline vehicle or suitable equivalent” in the monograph to ensure flexibility and efficacy.

3D-Printed Tablets The group discussed 3D-printed tablets in the context of forthcoming point-of-care manufacturing legislation. A paper was to be presented to the BP Commission at a future meeting.

717 Expert Advisory Group HCM: Herbal and Complementary Medicines COM(24)43

The report of the EAG HCM meeting (27.06.24) was endorsed.

718 **Expert Advisory Group MC1: Medicinal Chemicals** COM (24)44

The report of the EAG MC1 meeting (10:07:24) was endorsed and the following point was raised.

Cetirizine Oral Solution While assessing an application for this product, an assessor had noted that limits in previous applications had been approved outside of those in the BP monograph.

719 **Expert Advisory Group AIM: Anti Infective Medicines** COM(24)45

The report of the EAG AIM meeting (11:09:24) was endorsed and the following points were raised.

Moxidectin Preparations A difference in impurity limits between veterinary and human products was noted. Efforts were underway to align the limits, as the finished product monograph had tighter impurity limits compared to the drug substance monograph. The identification of degradation impurities in older products and the establishment of degradation limits for veterinary injections were also discussed.

Antimicrobial Resistance (AMR) A report from an Agency working group on AMR had been presented, which noted that the USP had provided free monographs to African countries to address AMR concerns. It had been agreed that the BP should explore ways to support this initiative moving forward.

720 **Expert Advisory Group BIO: Biological & Biotechnological Products** COM(24)46

The report of the EAG BIO meeting (01:10:24) was endorsed and the following points were raised.

Multi-Attribute Mass Spectrometry General Chapter Multi-Attribute Method (MAM) by mass spectrometry was discussed, building on a topic from the BPC July meeting. The potential for DPS involvement in this area was explored, and the Secretariat was tasked with assessing the feasibility of developing guidelines within either EAG BIO or WP BIO-DPS.

Bacterial Endotoxin Limit Investigation There was a further discussion on the bacterial endotoxin limit investigation, with a focus on developing target specifications. The group requested ongoing updates on this topic.

Heparin Injection NMR Identification Test In response to a customer query, extensive work on the published heparin sodium injection NMR identification test had been undertaken by staff at the MHRA Science Campus. Further data would be drafted and included in the more resources section of the monograph (minute 424 refers).

VII EUROPEAN PHARMACOPOEIA

721 European Pharmacopoeia Update COM(24)47

European Pharmacopoeia Commission The 179th session of the EP Commission had taken place in June.

UK Membership of expert groups of the European Pharmacopoeia Commission A list of new experts and their corresponding groups of the EPC was presented to the BP Commission.

VIII INTERNATIONAL COLLABORATION

722 International Update COM(24)48

Members were provided with an update on international activities.

World Health Organisation 15th International Meeting of the World Pharmacopoeias – 3rd Preparatory Meeting A teleconference had been held to review progress on actions from the previous meeting in preparation for the meeting scheduled for February. Key updates included the development of sustainability principles and the IMWP terms of reference.

International Society for Cell and Gene Therapy European Regional Meeting A presentation had been provided on the importance of pharmacopoeial standards and publicised BP guidance for ATMPs.

International Laboratory Forum on Counterfeit Medicines This meeting hosted by SwissMedic held in Solothurn provided for global regulatory laboratories to exchange intelligence on the testing of falsified medicines and explore strategies for testing suspect products.

BP Webinar In September and in collaboration with its publisher, TSO, the BP hosted its first annual webinar to introduce the BP 2025 publication. An overview of the BP and its new features, including sustainability initiatives, was presented. The event attracted 409 registrants from 49 countries, with 178 participants who attended live and actively engaged by submitting questions.

United States Pharmacopeia Bilateral Meeting In October, BP and USP management met in London to discuss various topics, including the renewal of the Memorandum of Understanding, harmonisation of standards, and environmental sustainability. This first in-person meeting in two years focused on informal harmonisation of drug product monographs and identified collaborative projects. Discussions also covered updates on biological standards, the environmental impact of pharmaceuticals, and further work on botanicals, herbals, and product lifecycle management. Monthly discussions had continued outside of this meeting to progress collaborative projects and information sharing.

World Health Organisation 58th Expert Committee on Specifications for Pharmaceutical Preparations This meeting in Geneva, where the committee advised on and approved new guidelines and reviewed topics such as high-risk excipients, paediatric formulations, and continuous manufacturing. Renewal of the BP-International Pharmacopoeia memorandum of understanding was also discussed.

World Standards Day A webinar was held on 16th October in conjunction with Merck/Sigma-Aldrich, where the new documentary and reference standards included in the BP 2025 were discussed as was the BPs approach to sustainability in developing our standards .

World Health Organisation 79th WHO INN Consultation This hybrid meeting was attended virtually in October.

IX ANY OTHER BUSINESS

723 Date of next meeting

Monday 3rd March 2025. It was noted that this meeting would be the annual in-person meeting at MHRA offices, Canary Wharf.

FOR INFORMATION:

724 British Pharmacopoeia 2026: Text Review Dates 2026

The dates for reviewing the BP 2026 and BP (Vet) 2026 text using the document review tool (DRT) were provided for information.

725 Items for Future Meetings

An updated list of items for discussion at future meetings was provided for information.

726 Abbreviations and Acronyms

A list of commonly used abbreviations and acronyms was provided for information.