SUMMARY MINUTES

of the

BRITISH PHARMACOPOEIA COMMISSION

A meeting of the British Pharmacopoeia Commission was held via videoconference on Monday 10th July 2023.

Present: Dr A M Brady, (*Chair*), Dr E Amirak, Dr A Barnes (*from minute 611 only*), Dr E Bush, Mr C E Giartosio, Dr A Gleadle (*lay member*), Dr V Jaitely, Mr S Jones, Dr P Marshall, Ms S Palser (*lay member*), Mr J Rickard, Professor M Simmonds.

In attendance: Mr S Hoare (*Secretary & Scientific Director*), Dr F J Swanson.

Also present: Ms S Begum, Ms H Corns, Mr P Crowley, Dr M Dmitriieva, Ms A Estlin, Mr K Rakowski, Ms C Swann, Mr D Tong, Mr M Whaley and Mr S Young.

Ms M Guler (Committee Services, MHRA) also attended the meeting. Mr N Moore (Innovative Devices Software and AI, MHRA) attended the meeting for the item recorded under minute 612.

An apology for absence was received from Mr R Lowe (*Vice-Chair*).

607 **Introductory Remarks**

Welcome The Chair welcomed members to the meeting. She also welcomed Mr Hoare who was attending his first meeting since taking on the role of Secretary & Scientific Director of the British Pharmacopoeia Commission.

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 **r**eminded 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 committeeservicesteam@mhra.gov.uk.

BPC Appointments The advert seeking to appoint new members of the BP Commission was due to close on 13th July 2023 and interviews would take place in October.

Dr Jaitely declared an interest in one or more agenda items and appropriate action was taken.

I MINUTES

608 The minutes of the meeting held on 6th March 2023 were confirmed.

II MATTERS ARISING FROM THE MINUTES

609 The following matters arising from the meeting held on 6th March 2023 were noted.

Minute 583 – Declaration of Interests The interests of BP Commission, Expert Advisory Group, Panel and Working Party members had been collated and included in the Medicines Advisory Bodies Annual Reports for 2022.

Minute 583 – BPC Appraisals The completed appraisals had been returned to the Department of Health and Social Care.

Minute 585 – Pyrogen/Bacterial Endotoxin Testing Policy Further discussions on this matter would take place at the next meeting of EAG BIO: Biological and Biotechnological Products, which was scheduled for September 2023.

Minute 587 – BPC Policies and Procedures; Dissolution limits Proposals relating to Dissolution limits and other pharmacopoeial issues would be brought to the attention of members at the November meeting.

Minute 590 – Extractable Volume of Parenteral Preparations The proposals for the BP to consider developing pharmacopoeial comparison documents and/or to progress this matter through different routes had not yet been addressed internally.

III REPORTS AND CORRESPONDENCE

GOVERNANCE

610 Update from the Secretary & Scientific Director

Mr Hoare provided members with an update on key activities for the MHRA.

OPERATIONAL

611 Sustainability Project: Update COM(23)18

Ms Estlin provided an update on the work carried out as part of the fast stream project on reducing the environmental impact of the British Pharmacopoeia.

Sustainability Guidance Preparation of the draft guidance had involved reviewing a range of existing information and developing text that would be suitable for a pharmaceutical quality testing environment. Feedback had been received from the initial group of stakeholders and a request for interested parties to help further develop and review the guidance had recently been posted on the BP website. Significant interest had already been expressed in response to the post and members were encouraged to raise awareness of the chance to contribute through their networks.

Members agreed that the draft guidance was an extremely comprehensive and useful document.

BP Laboratory Trials Work had been initiated to identify any changes that could be made to BP Laboratory practices, including looking at the dispatch of BPCRS.

Two studies were being undertaken to ascertain if a change in practice had any adverse effect on the test results. Further trials were planned in the coming months and, if successful, the intention was to include these examples as case studies in the guidance.

Sustainability in Monographs Proposals to bring sustainability practices into the development and revision of BP monographs had been presented at the recent EAG MC2: Medicinal Chemicals meeting. These had included scaling down column sizes, taking into account the adjustments to the chromatographic conditions permitted under the Ph. Eur. text on Chromatographic Separation Techniques (CST), and the demonstration of online calculators that supported column scaling and measured the “greenness” of an analytical method. The intention was to develop guidelines for use by the Secretariat and Laboratory.

612 **Digital Therapeutics** COM(23)19

Ms Estlin provided an update on the work carried out following the previous fast stream project looking at the viability and feasibility of the BP developing standards and/or guidance on Digital Therapeutics.

Background The initial project had concluded that there was a risk that publishing any guidance on digital therapeutics within the BP could cause confusion for manufacturers and would not necessarily reach the target audience. The report had recommended that no current action should be undertaken but that the BP should maintain an active watching brief on activities within the MHRA.

Agency Activities on SaMD Mr Moore provided an overview of the MHRA activities in this area.

Recommendations and Discussion It was recommended that the BP should support Devices colleagues working in this area, when required. It was not intended that the BP should develop monographs or guidance documents since there were other means of controlling the quality of medical devices.

Members endorsed the proposals that the BP should continue to support colleagues, as required, and that we should maintain awareness of MHRA activities in this area.

613 **Alkyl Sulfonate Ester Impurities** COM(23)20

A further attempt to obtain feedback on whether the current Production statements relating to alkylsulfonate ester impurities should be retained in or removed from BP monographs had been unsuccessful. It had been concluded that the final decision would not adversely impact users of the BP.

Members were invited to discuss the proposal to remove the statements from a future edition of the BP. It was noted that any proposed changes to monographs would be drawn to the attention of users via the website consultation process and would explain the rationale behind the proposed changes. This would highlight that the proposed removal of the statements was a risk-based approach to control and was not based on any new data.

After a wide-ranging discussion the consensus was that the statements should be retained in the BP, at least for the time being.

614 **Working Party ATMP: Progress Report** COM(23)21

An update on the recent activities of the Working Party on Advanced Therapy Medicinal Products was provided for information.

5th Meeting At their November 2022 meeting the Working Party had presented the outcomes from a horizon scanning exercise that had been carried out to identify new areas of work that would provide the most benefit to patients. It had been agreed that the group should develop guidance on Replication Competent Virus (RCV) Assays and on Validation Protocols and Reports for Digital and Quantitative Polymerase Chain Reaction for Vector Copy Number.

Public consultations A large number of comments had been received in response to the consultation on Characterisation of the Particle Population in AAV Products. The

consultation on T Cell and NK Cell Characterisation Assays had closed at the end of May and the comments received were due to be considered by the relevant sub-group.

Guidance documents The Flow Cytometry and Vector Copy Number guidance documents had been well received and had been downloaded by almost 500 unique users.

New Sub-groups New sub-groups on (1) Replication Competent Virus Assays and (2) dPCR and qPCR Validation Protocols and Reports had been established.

Members were pleased to note the continuing progress of the ATMP Working Party. The Secretariat was keen to involve as many relevant organisations as possible in the work and invited members to provide any details of further potential experts or organisations that might be able to assist.

615 **British Pharmacopoeia Laboratory** COM(23)22

British Pharmacopoeia Laboratory Reports The list of reports concerning new and revised monographs that had been prepared by the Laboratory since the March 2023 meeting was provided for information.

British Pharmacopoeia Chemical Reference Substances Tables providing information on BPCRS up to the end of May 2023 were provided for information.

616 **Abbreviations and Acronyms for BP Use** COM(23)23

A draft list defining commonly used abbreviations and acronyms had been prepared in response to a request for such information at the last meeting. The draft list incorporated some of the details included in historical lists and from an internal guidance document used by the Secretariat.

Members agreed that the information in the list was very useful and that it should be expanded to include additional terms over time. Members were invited to provide further suggestions for inclusion, and it was agreed that the list should be added to the “All Experts” area of the forum.

IV FUTURE PUBLICATIONS

617 **BP Website Redevelopment** COM(23)24

As part of the new publication contract the current BP website was being redeveloped by The Stationery Office (TSO).

TSO had carried out extensive user research and the updated website would incorporate various suggestions from users. A significant amount of development work had been undertaken and the new site had been aligned, where possible, with the Government Digital Service Standard which was aimed at providing a user-friendly website. Extensive testing had been carried out and several issues had been identified and resolved. The intention was to launch a beta version so that users could access this alongside the current site for a limited time.

V ANALYTICAL ISSUES

618 LC-UV Identification: Acceptable Spectra COM(23)25

Background Identification tests using LC/UV-DAD methods had first been introduced into BP monographs by means of the BP 2022 and further tests had been added in later publications. A standard form of words had been agreed for inclusion in monographs which included reference to the concordance of the UV spectra and similarity of retentions times for the test and reference solutions.

Feedback from MC2 Members and the Secretariat During discussions prior to the adoption of these methods it had been agreed that they should only be included in cases where the UV spectrum was "characteristic". At the November 2022 EAG MC2: Medicinal Chemicals meeting there had been differing views between experts regarding whether some spectra were sufficiently characteristic. The consensus had been that, in order to be considered characteristic, the spectra should have at least two definable features such as a maximum or minimum within the range 210 to 400 nm.

The Secretariat had discussed this matter internally and had agreed that for a standard UV Identification test, specifying absorption maxima at defined wavelengths was appropriate. However, when a hyphenated, orthogonal analytical method was used, as in the case of LC/UV-DAD, it had been agreed that concordance between the spectra obtained from the test and reference solutions was more relevant.

Review of Current Guidance and Discussion The current guidance on Identification in the Aide Memoire stated that "*The use of LC/UV-DAD (Diode Array Detection) may be included as a stand-alone test* ***if the UV spectrum is characteristic****……".*

The consultation document proposing the introduction of these methods had included the following statement: "*The UV spectra of the drug substances will be taken into account when LC/UV-DAD is considered as an identification test. The spectra should ideally be reasonably characteristic, i.e. show some absorbance at wavelengths > 220 nm*.".

The Secretariat had proposed that the wording of the Aide Memoire should be updated to allow for a broader acceptance of UV spectra, which would align with regulatory expectations and would help to ensure a consistent approach across Expert Advisory Groups when spectra were reviewed by the Laboratory, Secretariat and BP experts. The proposed wording was accepted, and it was agreed that this should be incorporated in the next update to the Aide Memoire.

VI EXPERT ADVISORY GROUPS / PANELS OF EXPERTS

619 Expert Advisory Groups, Panels of Experts and Working Parties: Membership Review COM(23)26

Review The term of office for all members of the Expert Advisory Groups, Panels of Experts and Working Parties would end on 31st December 2023, following a one-year extension for all members. In collaboration with Chairs and Vice-Chairs, the Secretariat had started to review the membership of their current groups to identify those members who should be re-appointed, those who should not be re-appointed and to highlight gaps in expertise and current vacancies where new members were required. Over the next few months various means of trying to attract new members would be employed, including posting an item on the BP website seeking expressions of interest, raising awareness through different channels and asking current members to promote awareness throughout their networks. Steps would be taken to ensure that the expertise of current and new

members of the BP Commission was best utilised within the EAGs, Panels and Working Parties. The intention was to provide a consolidated set of proposals for consideration at the November meeting.

620 **BP Workload Analysis** COM(23)27

Mr Hoare presented a paper highlighting current BP support for the Expert Advisory Groups and other areas of work and outlining options to manage the workload across the team.

621 **Expert Advisory Group MC1: Medicinal Chemicals** COM(23)28

The report of the EAG MC1 meeting (25:01:23) was endorsed. The meeting had been held in hybrid format, with some members attending in-person and others attending remotely. Many new and revised monographs had been progressed.

622 **Expert Advisory Group MC3: Medicinal Chemicals** COM(23)29

The report of the EAG MC3 meeting (22:02:23) was endorsed.

623 **Expert Advisory Group PCN: Pharmacy and Nomenclature** COM(23)30

The report of the EAG PCN meeting (01:03:23) was endorsed and the following points were raised.

MHRA Patient Safety Alerts As a result of a patient safety alert, EAG MC2: Medicinal Chemicals were reviewing the monograph for Mebeverine Tablets with a view to including a Dissolution test.

Prolonged-release Chewable Tablets EAG PCN had been unable to reach a consensus about the naming of such products.

VII EUROPEAN PHARMACOPOEIA

624 **European Pharmacopoeia Update** COM(23)31

European Pharmacopoeia Commission Members discussed items from the 175th and 176th Sessions of the EP Commission and advised the UK Delegation accordingly.

Annual NPA Meeting The annual meeting of the Secretaries of National Pharmacopoeial Authorities had been held in May in Finland.

Questionnaires sent to the UK National Authority A list of the recent questionnaires relating to proposals to add items to or remove items from the Ph Eur work programme was presented for information.

VIII INTERNATIONAL COLLABORATION

625 **International Update** COM(23)32

Members were provided with an update on international activities.

United States Pharmacopeia Monthly teleconferences between the BP and the USP were being held to continue discussions on areas of mutual interest.

World Health Organization Mr Evans had chaired the 76th Consultation on International Nonproprietary Names in March. A record number of new names for chemical and biological substances had been discussed (270), including many for new advanced therapy medicinal products. In April Ms Corns had attended the WHO Expert Consultation on Quality Control and Pharmacopoeial Specifications of Medicines which focussed on the development of monographs and general text for inclusion in the International Pharmacopoeia.

BP/CPPQ Symposium The BP had held discussions with the US Mid-West Compendial Policy, Process and Quality Stakeholder Organisation Discussion Group (CPPQ) in April.

Indian Pharmacopoeia Further discussions had been held with representatives of the Indian Pharmacopoeia Commission to consider the potential joint development of monographs and standards and other collaboration opportunities.

Wider Agency Engagement; ICH Assembly (Vancouver, June 2023) MHRA staff had attended their first ICH Assembly meeting since the agency had become a full member of the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH). There was an ambitious ICH work programme which was aiming to streamline and consolidate some of the existing guidelines and undertake a gap analysis to identify new topics.

IX ANY OTHER BUSINESS

626 **Staff** Dr Fiona Swanson would be leaving the MHRA at the end of August and so this would be her last meeting. The Chair thanked Dr Swanson on behalf of the Commission for all her hard work at the BP over the years, particularly for her work with the British Pharmacopoeia Commission, and wished her well for the future.

627 **Date of next meeting**

Monday 6th November 2023.

Meeting dates for 2024 would be arranged shortly.

FOR INFORMATION:

628 **Items for Future Meetings**

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