MINUTES

OF THE PQRI SSL WG TELECONFERENCE TO CONSIDER DATA COLLECTION

ON 18 DECEMBER 2006

I. PARTICIPANTS

Dave Christopher (Schering-Plough), Leader
Paula Hudson (Lilly)
Lana Lyapustina (IPAC-RS)
Nate Patterson (Vertex)
David Thomas (J&J)

II. OPENING

Mr. Christopher opened the teleconference. Dr. Lyapustina reminded the participants of the competition guidelines and cautioned against any discussion of competitively sensitive subjects. The objectives of the teleconference were to discuss: (i) potential uses of stability data to be gathered by the SSL Working Group; (ii) format of the data template using an example circulated before the teleconference; (iii) types of data (inclusion and exclusion criteria); (iv) amount of data that would be needed; and (v) assignments and next steps.

III. DISCUSSION

The participants discussed the questions listed in the agenda and agreed on the following:

- While it would be useful to have data and the associated specifications for each product, it was considered unlikely that companies would be agreeable to providing this, even in a blinded fashion with results reported as percent of specification range away from target. However, with blinded data reported as percent label strength it will be possible to identify typical time trends and variabilities (e.g., within- and between-batch and intermediate precision). In this case, information about actual specifications would not be critical to the analysis. If needed for assessment purposes, the submitted data could be statistically tested against "arbitrary", or artificial, judiciously chosen specifications. Data will be analyzed both to demonstrate issues with current approaches to shelf-life estimation/justification and to explore the appropriateness of to-be-proposed approaches.
- The current typical testing scheme includes initial, 3-month, 6-month, 9-month, etc. time stations. An alternate approach might require testing more heavily weighted at key time points (e.g., 0 and 12 months); however existing data will likely not follow that scheme. Participants considered whether prospective data generation to accommodate a new scheme would be appropriate and agreed that this would likely be unfeasible. The participants therefore agreed that statistical simulation and modeling, based on real data, might be the best way to assess and justify alternate approaches.

- Working Group members discussed attributes for which data could be requested, e.g., assay, dose content uniformity at release (to characterize the product variability), impurities and degradants, moisture content and dissolution. They agreed that the most important attributes to focus on are: assay and degradants. For the degradants, it was agreed that unless the data were provided as %weight/weight (and not, e.g., peak area), it might not be useful for the proposed work.

Regarding the types and amount of data, the following was agreed:

- At least 3 batches followed for 18 months would be required. There will be no maximum limit for the data.
- All dosage forms would be eligible (e.g., solid oral, parenteral, etc.).
- Products should be either currently under development or approved within the last 10 years.
- The template should request a blinded, but unambiguous identification for each batch to allow calculation of within-and between batch variability.
- The template should also request the date of when the units were put on stability and when they were tested, stability storage conditions, and possibly the type of test method.

The following questions were raised but their discussion was deferred to a later email or telephone conversation due to limited time:

- Will stability data for API be of interest?
- Would accelerated stability data be useful?
- What product categories should be included in the data description (by dosage form, formulation type, route of administration)?
- Should the time of approval be indicated, and if so, how (e.g., 1996-2000 and 2001-2006)?

The participants agreed that other similar questions be highlighted in the draft Data Request letter and discussed with the full SSL WG as appropriate.

The participants briefly discussed the need for a data confidentiality protocol and a neutral-party data coordinator.

IV. AGREED ACTIONS

- Mr. Christopher and Dr. Lyapustina will draft and circulate for comment a "Data Request" letter, which would explain the intent of data collection, and the type and format of the requested data.

V. NEXT TELECONFERENCE/MEETING

- The next teleconference to discuss data collection will be scheduled by email for the week of 8 January, 2007.