

The pharmaceutical industry in Tunisia



TUNTWIN Project
«Stakeholders Event»



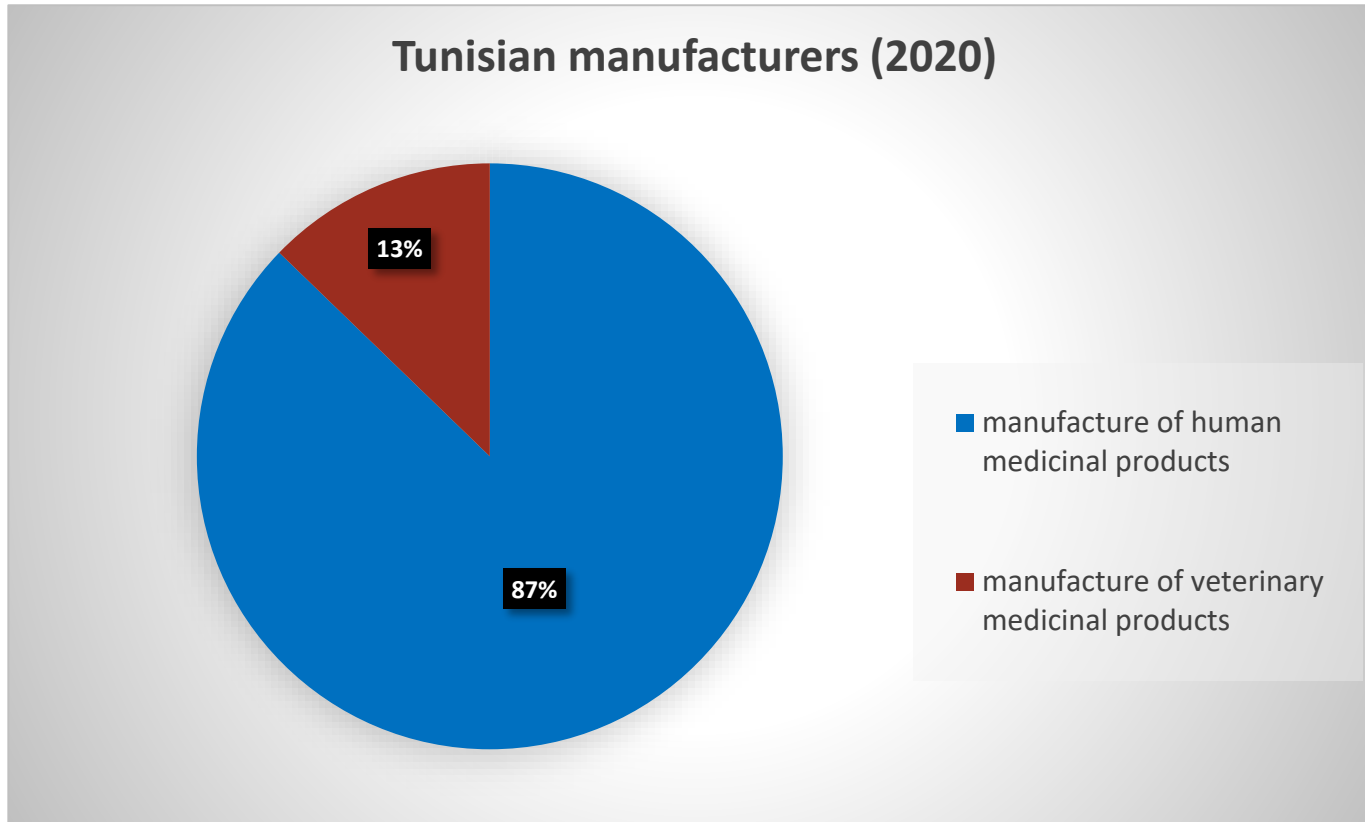
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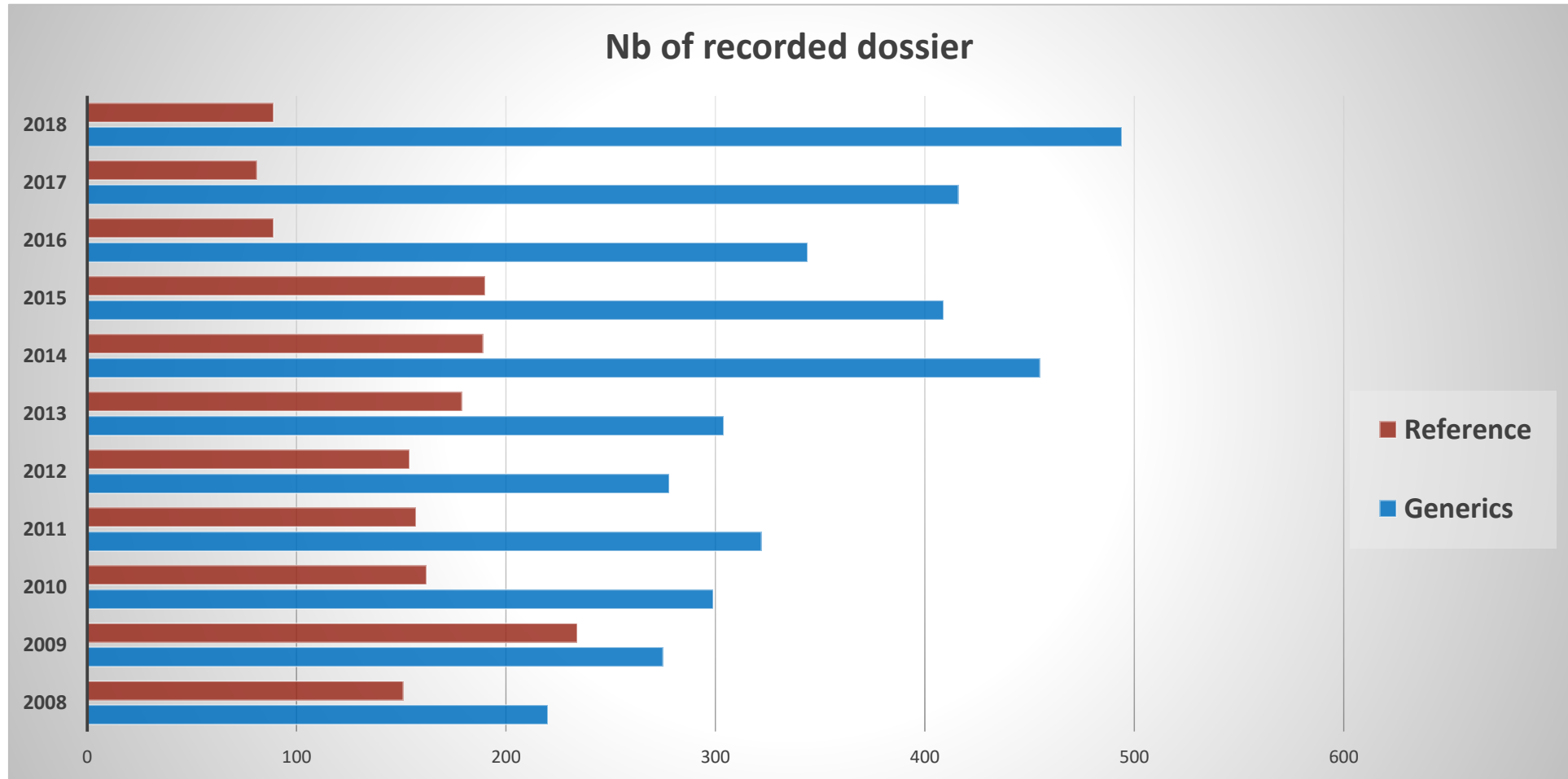
Monday, November 15, 2021

Drug Tunisian Manufacturers

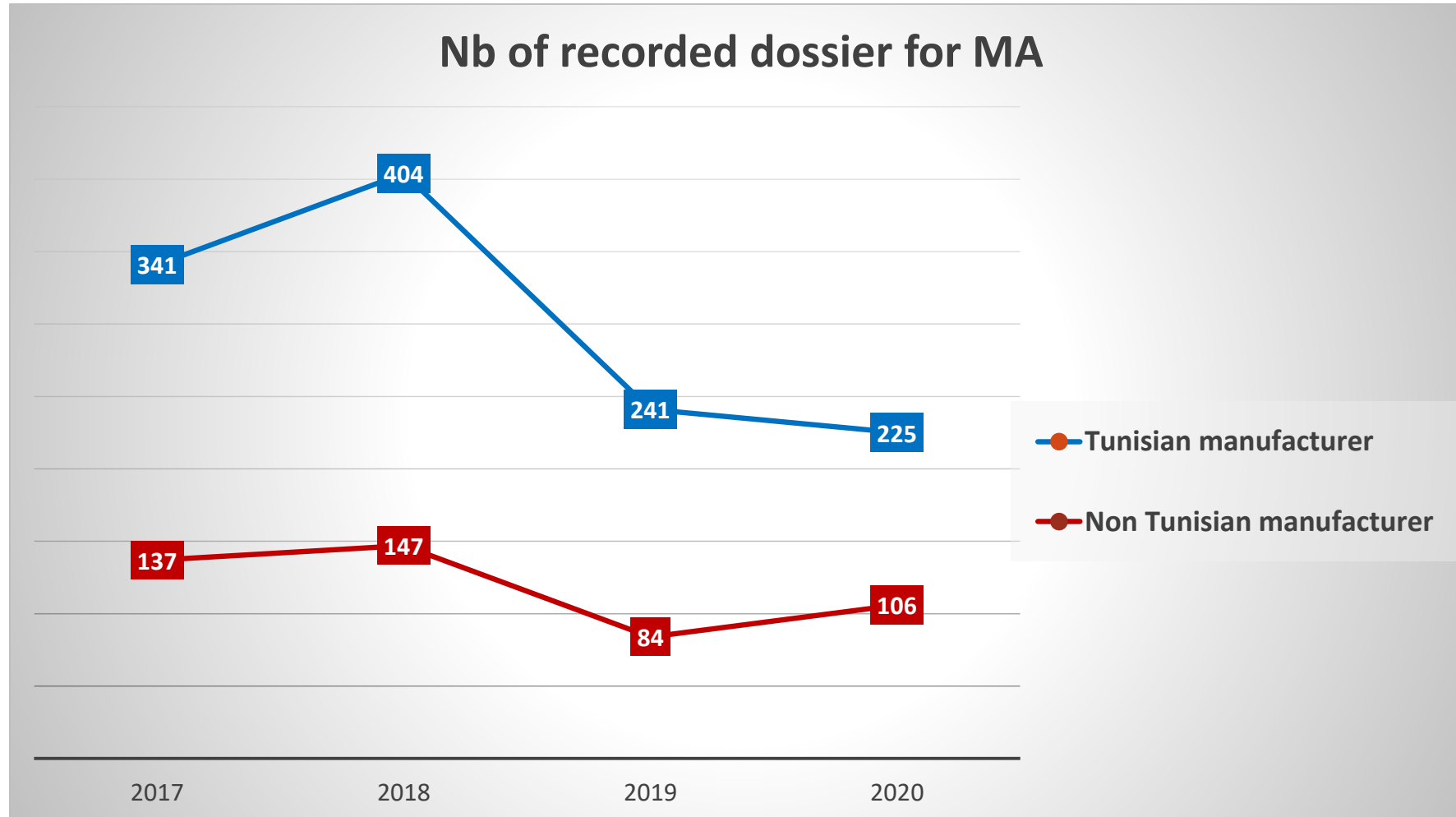
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pharmaceutical
industries



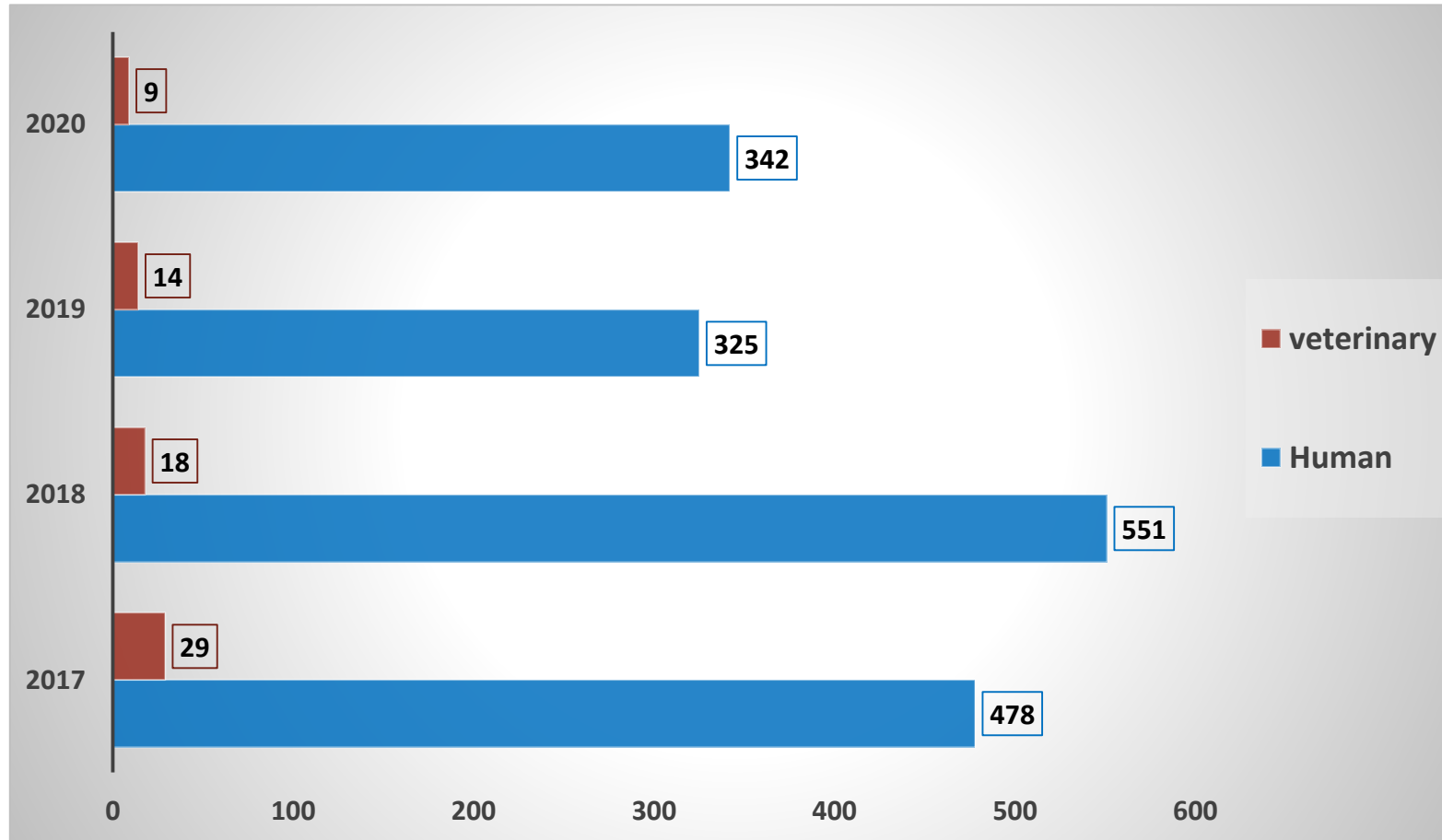
Generic versus reference medicinal product



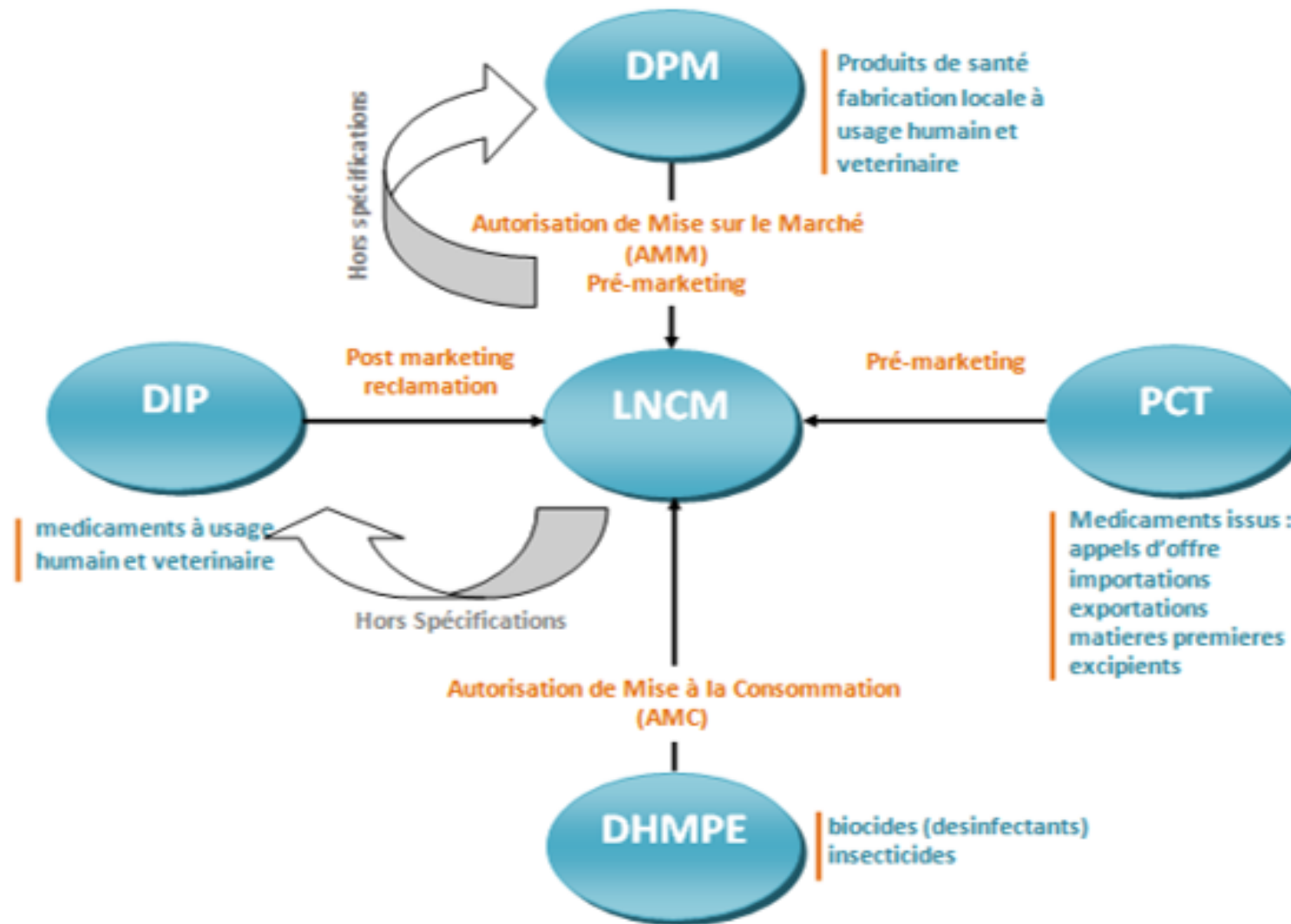
Marketing Authorization



Marketing Authorization



Regulatory structures : Organization



Missions and goals

- ❖ Ensure adequate and reliable supply of safe effective and quality-controlled drugs, and promote its rational use
- ❖ Enhance the governance of the health system and improve the quality and the cost-effectiveness of health care services

Missions and goals

- ❖ Support the Local Industry while maintaining and continuously upgrading its standards to meet the International requirement.
- ❖ Enable it to increase, its local Market Share and expand to Export Countries.

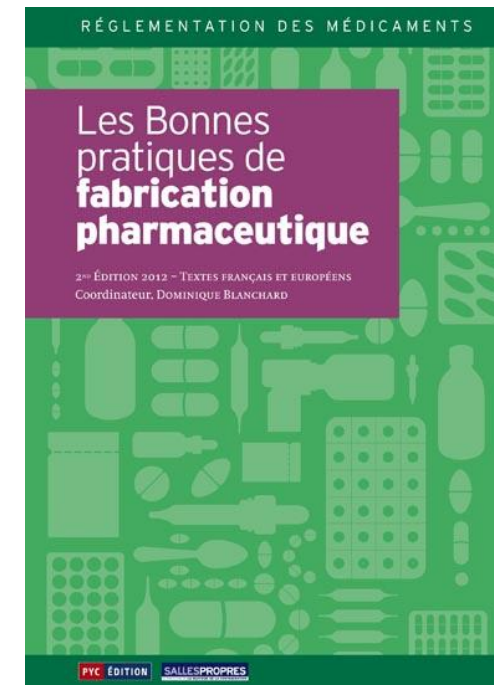
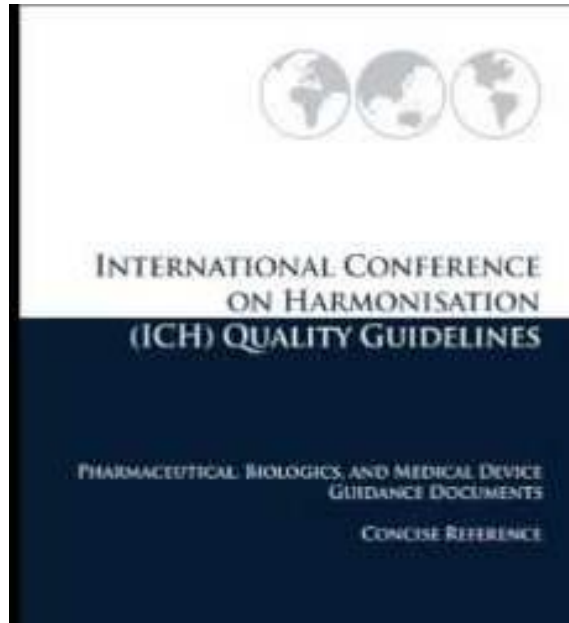
Missions and goals

- ❖ Quality control for medicines applying for marketing authorization (AMM) during registration process, variations or renewal.
- ❖ Quality control for medicines for human and veterinary use in addition to raw materials and insecticides.

Missions and goals

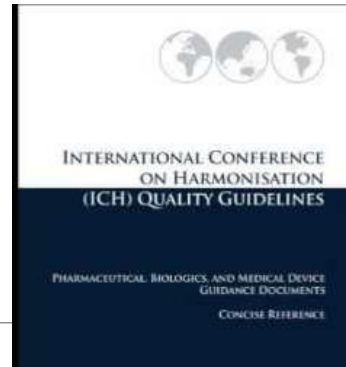
- ❖ Quality control for all medicines marketed in Tunisia before commercialization in collaboration with the central pharmacy of Tunisia PCT (Pre-marketing)
- ❖ Quality control during inspection operations especially in case of complaints and post-marketing

Guidelines



Guidelines

Guidelines ICH



➤ ICH : *International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH)*

Quality Guidelines (Q) : ICH Q1 → Q12.

Safety guidelines (S) : ICH E1 → ICH E18

Efficacy guidelines (E) : ICH E1 → ICH E18

Multidisciplinary guidelines (M) : ICH M1 → ICH M8



Guidelines



Guidelines EMA

- *Decentralized agency of the European Union (EU) responsible for the scientific evaluation, supervision and safety monitoring of medicines in the EU.*
- *Networking organization whose activities involve thousands of experts from across Europe.*

Guidelines



Guidelines OMS

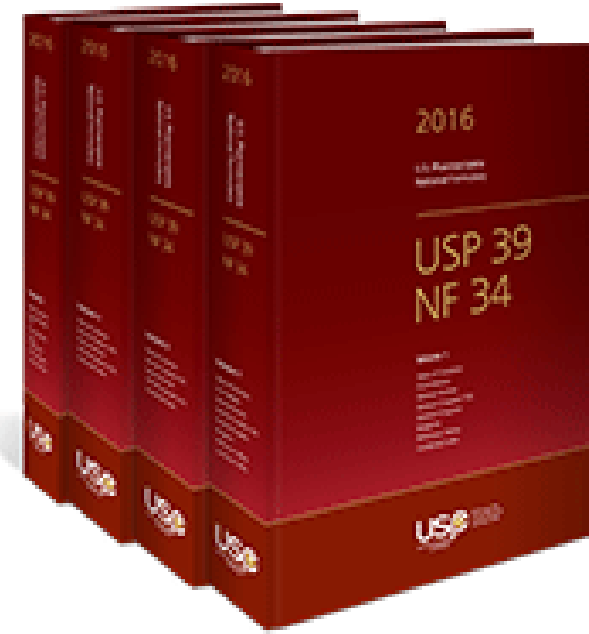
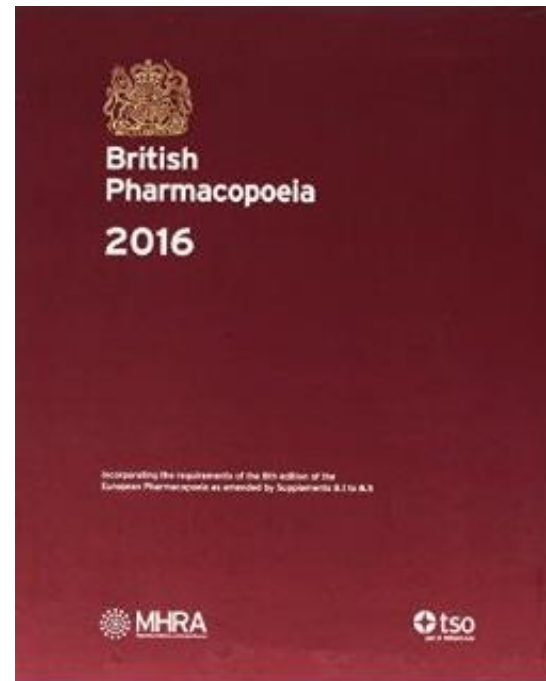
- *Lead and coordinate global health within the United Nations system.*
- *Set standards and criteria, promote and monitor their implementation*

Guidelines FDA

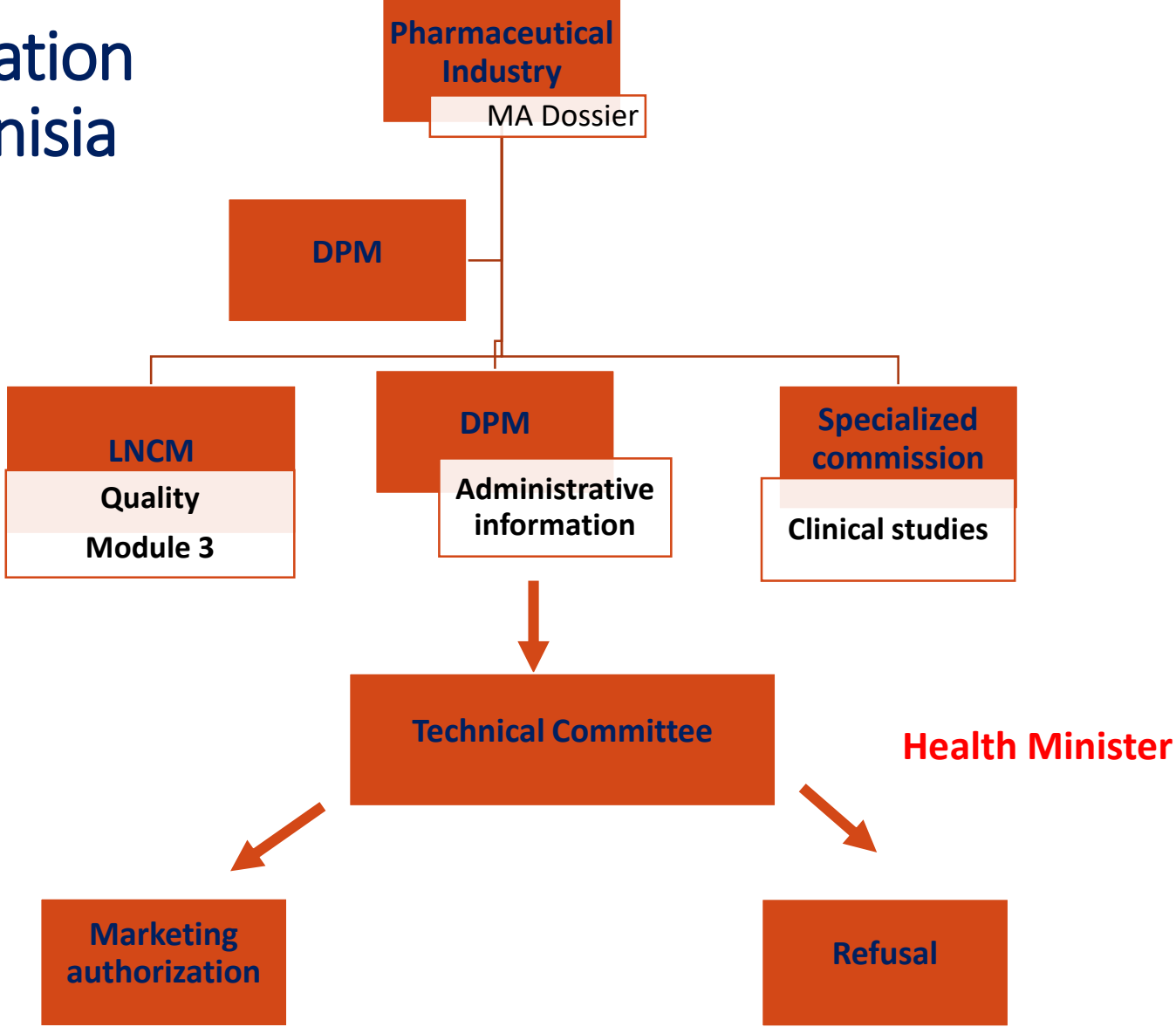


- *The Food and Drug Administration is responsible for protecting the public health by ensuring the safety, efficacy, and security of human and veterinary drugs, biological products, and medical devices; and by ensuring the safety of our nation's food supply, cosmetics, and products that emit radiation.*

Guidelines

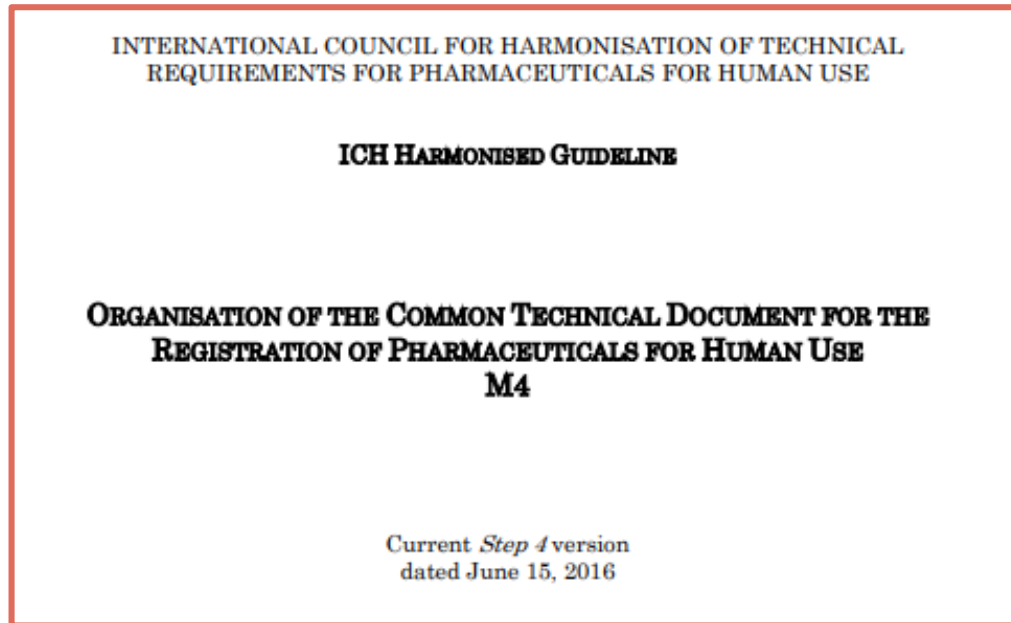


Medicine registration procedure in Tunisia

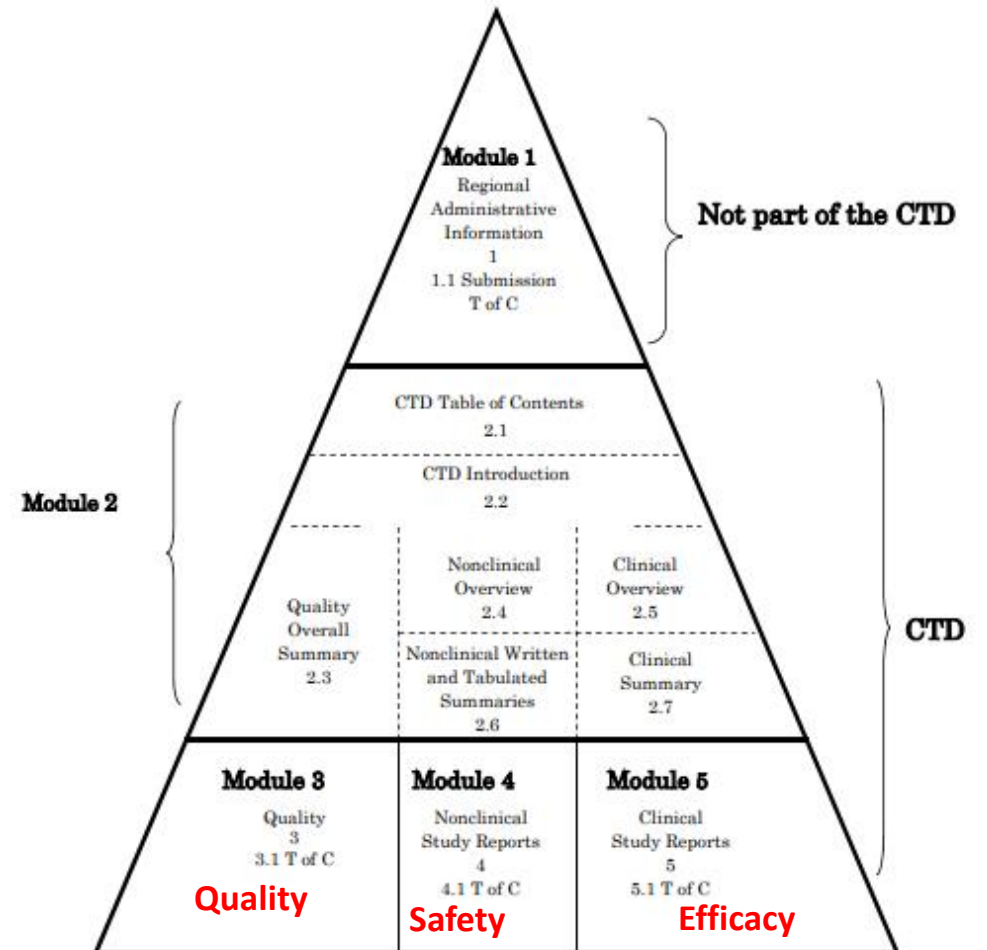


Medicine registration procedure in Tunisia

Organisation of The Common Technical Document



Diagrammatic Representation of the Organization of the ICH CTD Common Technical Document



Quality : Module 3 CTD sections

3.2.S Drug Substance (Compound, Manufacturer)	3.2.P Drug Product (Compound, Dosage Form, Manufacturer)
3.2.S.1 General Information <ul style="list-style-type: none">• Nomenclature, structure• General properties	3.2.P.1 Description and Composition <ul style="list-style-type: none">• Formulation composition• Excipient levels and function
3.2.S.2 Manufacture <ul style="list-style-type: none">• Manufacturer, process description• Controls, validation, process develop.	3.2.P.2 Pharm Development <ul style="list-style-type: none">• Formulation, process, container dev.• Microbial attributes, compatibility
3.2.S.3 Characterization <ul style="list-style-type: none">• Structural elucidation• Impurity sources, identification	3.2.P.3 Manufacture <ul style="list-style-type: none">• Manufacturer, process description• Controls, validation
3.2.S.4 Control <ul style="list-style-type: none">• Specification, methods, validation• Batch analyses, specification justification	3.2.P.4 Control Excipients <ul style="list-style-type: none">• Non/Compendial, origin, novel• Specification, justification
3.2.S.5 Reference Standards <ul style="list-style-type: none">• Purchase information• Method of preparation, characterization	3.2.P.5 Control DP <ul style="list-style-type: none">• Specs, methods, validation, impurities• Batch analyses, specification justification
3.2.S.6 Container Closure <ul style="list-style-type: none">• Description, materials, dimensions• Specifications, drawings	3.2.P.6 Reference Standards <ul style="list-style-type: none">• Purchase information• Method of preparation, characterization
3.2.S.7 Stability <ul style="list-style-type: none">• Summary, stability protocol/commitment• Stability Data	3.2.P.7 Container Closure <ul style="list-style-type: none">• Description, materials, dimensions• Specifications, drawings
	3.2.P.8 Stability <ul style="list-style-type: none">• Summary, stability protocol/commitment• Stability Data

Quality : Module 3 CTD sections

The quality of **drug substances** and **drug products** is determined by

- Their design, development, in-process controls, GMP controls, and process validation
- specifications applied to them throughout development and manufacture

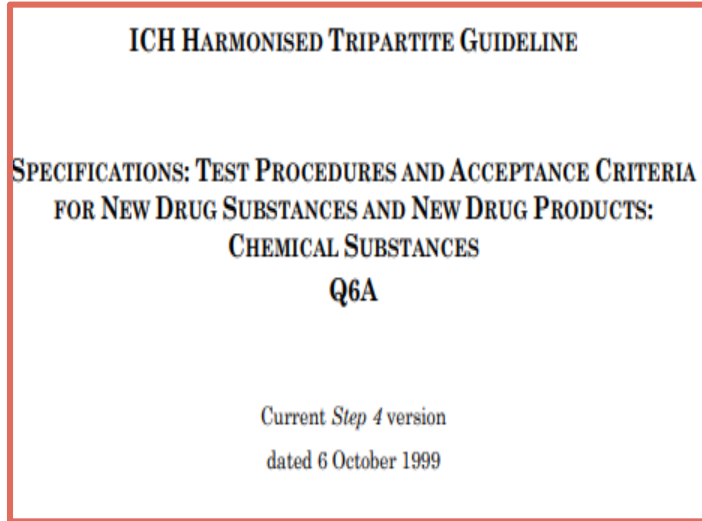
Quality : Specifications /criteria

- A **specification** is defined as a list of **tests, references** to analytical procedures, and appropriate **acceptance criteria**, which are numerical limits, ranges, or other criteria for the tests described.
- It establishes **the set of criteria** to which a drug substance or drug product should conform to be considered acceptable for its intended use.

Quality : Specifications /criteria

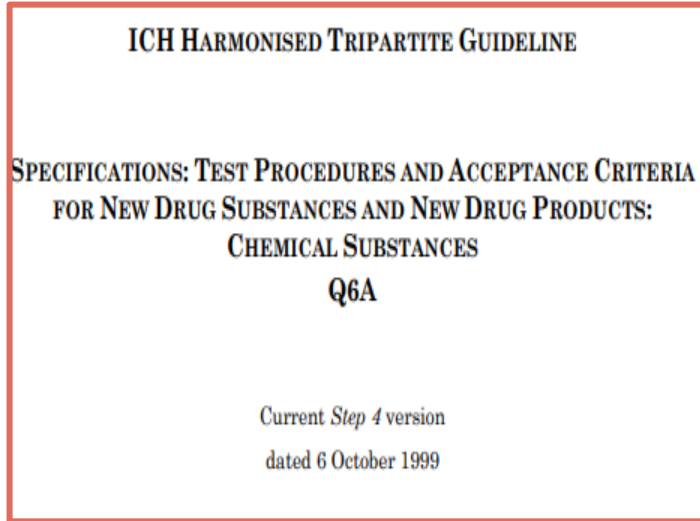
- "Conformance to specifications" means that the drug substance and / or drug product, when tested according to the listed analytical procedures, will **meet the listed acceptance criteria**.
- **Specifications** are **critical quality standards** that are proposed and justified by the manufacturer and approved by regulatory authorities as conditions of approval.

Quality : Specifications /criteria



	Universal Test/Criteria	Specific Tests / Criteria
Drug Substance	Description	Physicochemical properties
	Identification	Particle size
	Assay	Polymorphisme form
	impurities	Tests for chiral new drug substances
		Inorganic impurities
		Microbial limits
		Water content

Quality : Specifications /criteria

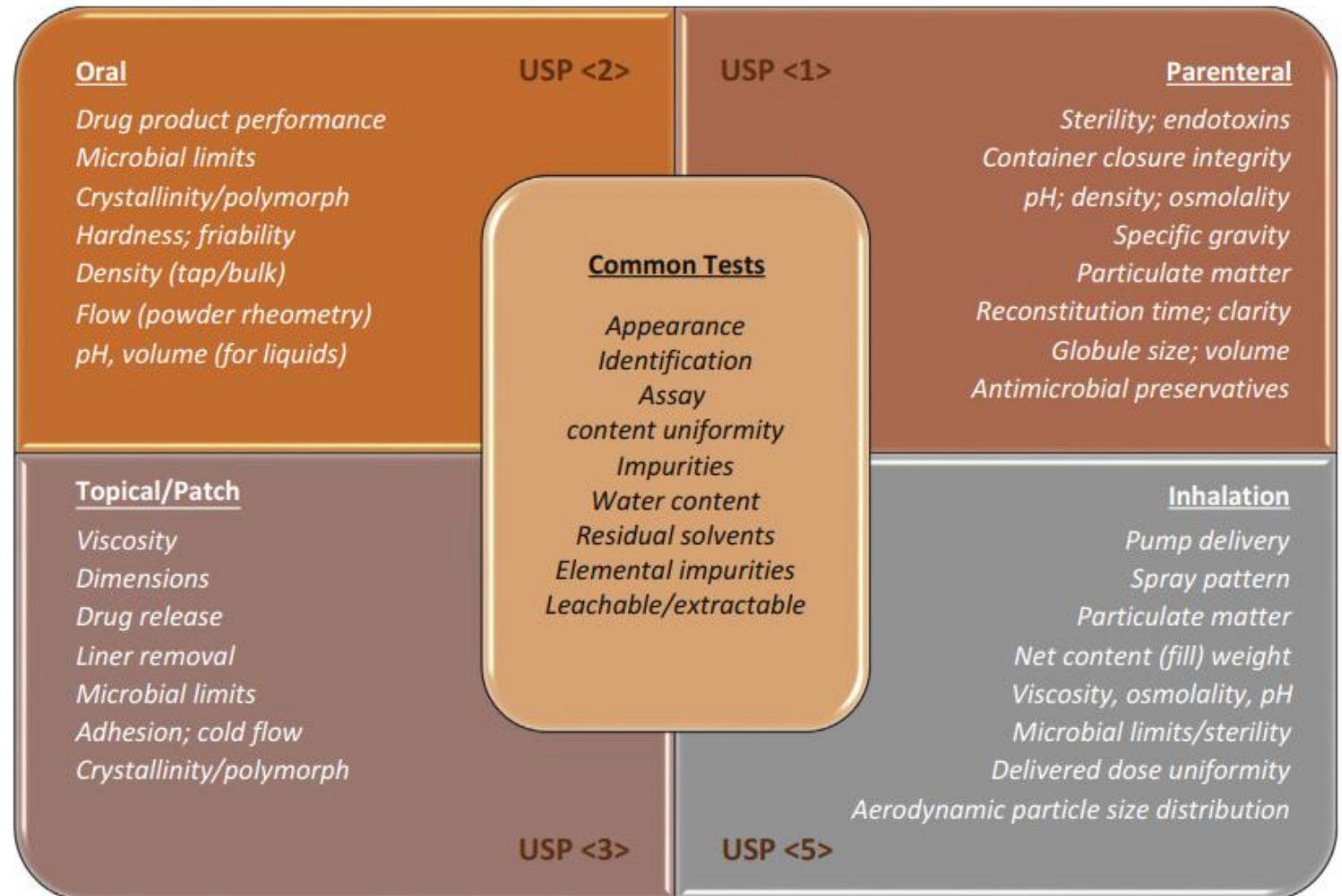


	Universal Test/Criteria	Specific Tests / Criteria
Drug Product	Description	Dissolution:
	Identification	Disintegration
	Assay	Antimicrobial preservative content
	Impurities	Antimicrobial preservative content
		pH
		Alcohol content ...

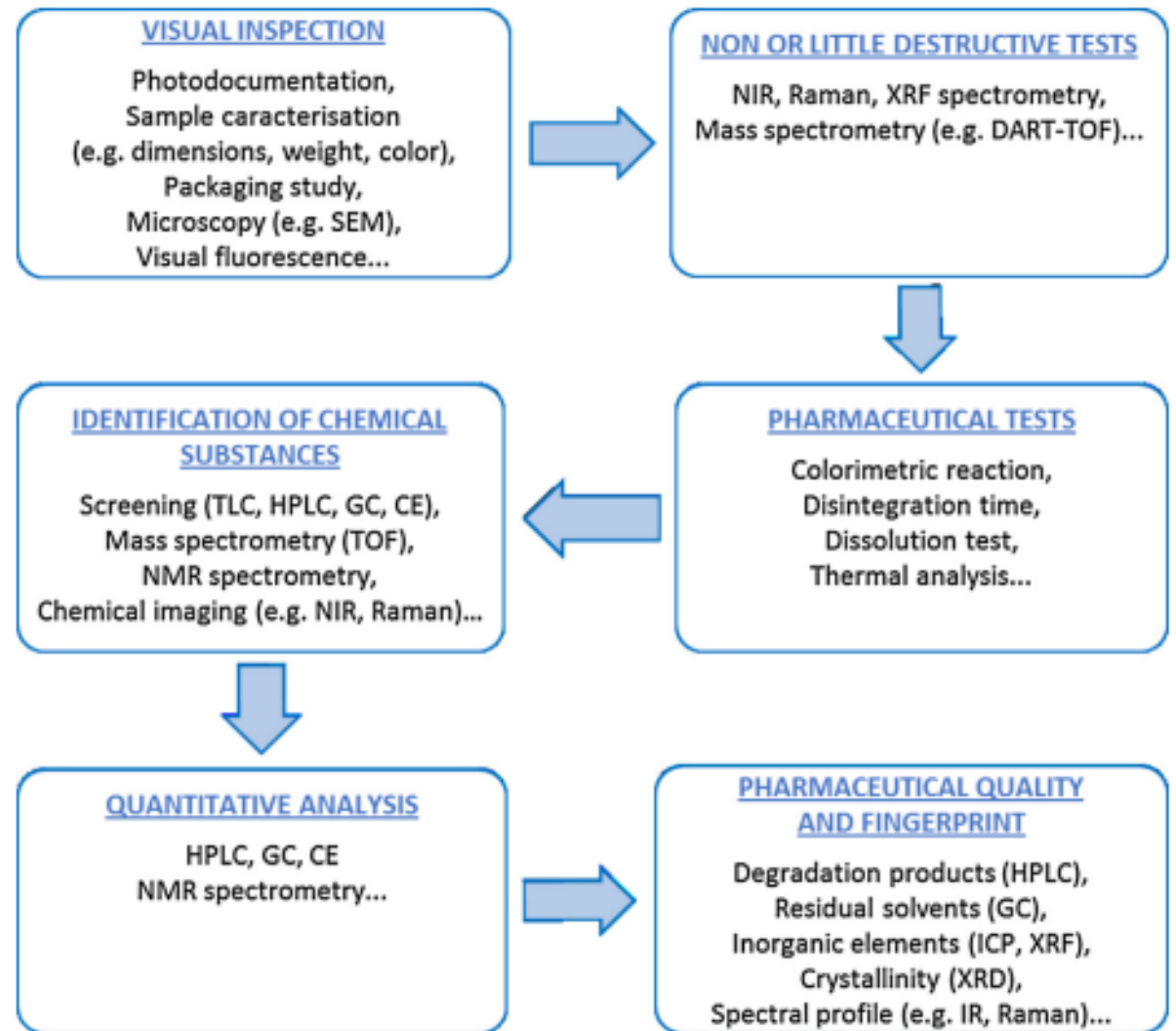
Specification tests by dosage form

❖ ICH Q6

❖ EP, USP



Physico-chemical methods



Impurities

- ❖ **Organic impurities** (*process and drug related*)
- ❖ **Inorganic impurities** (*from manufacturing process, identified and known*)
- ❖ **Residual solvents** (*organic or inorganic liquids*)

ICH HARMONISED TRIPARTITE GUIDELINE

IMPURITIES IN NEW DRUG SUBSTANCES
Q3A(R2)

Current Step 4 version
dated 25 October 2006

Classification of impurities

Organic impurities

❖ Starting materials

By-products

Intermediates

Degradation product

Reagents, ligands and catalysts

Organic impurities : regulation and methods

Organic Impurities				
Sub Type	Process related	degradants	Chiral impurities	Genotoxic impurities
Common analytical technique	HPLC, GC, GCMS, LCMS, TLC	HPLC, GC, GCMS, LCMS, TLC	HPLC, GC, CE	HPLC, GC, GCMS, LCMS, NMR, IC
API Guidance Reference and limits	ICH Q3A (0,03% to 0,15% as per dose), ICH Q6, USP, EP	ICH Q3A (0,05% to 0,15% as per dose), ICH Q6, USP, EP	ICH Q3A (0,05% to 0,15% as per dose), ICH Q6, FDA guidance, USP, EP	ICH M7, S9, FDA guidance, as per TTC limit and duration of treatment
Drug product Guidance Reference and limits	Usually not monitoring in drug product	ICH Q3A (0,2% to 1% as per dose), ICH Q6, USP	Usually not monitoring in drug product. Evaluation study done in few cases	Usually not monitoring in drug product. Evaluation study done in few cases

Classification of impurities

Inorganic impurities

❖ Reagents, ligands and catalysts

Heavy metals or other residual metals

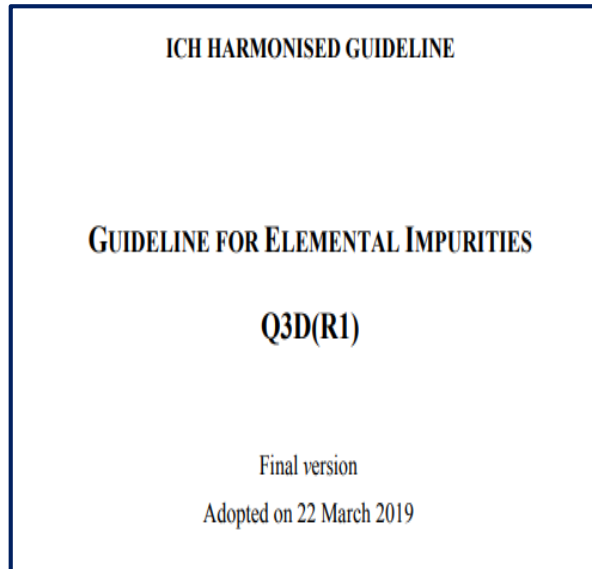
Inorganic salts

Other materials (e.g., filter aids, charcoal)

Inorganic impurities : regulation

- ❖ Normally detected and quantified using pharmacopeial or other appropriate procedures
- ❖ Carry-over of catalysts to the new drug substance should be evaluated during development

Inorganic impurities : regulation



CLASS 1

- Human toxicants that have limited or no use in the manufacture of pharmaceuticals.
- Their presence in drug products typically comes from commonly used materials. require evaluation during the risk

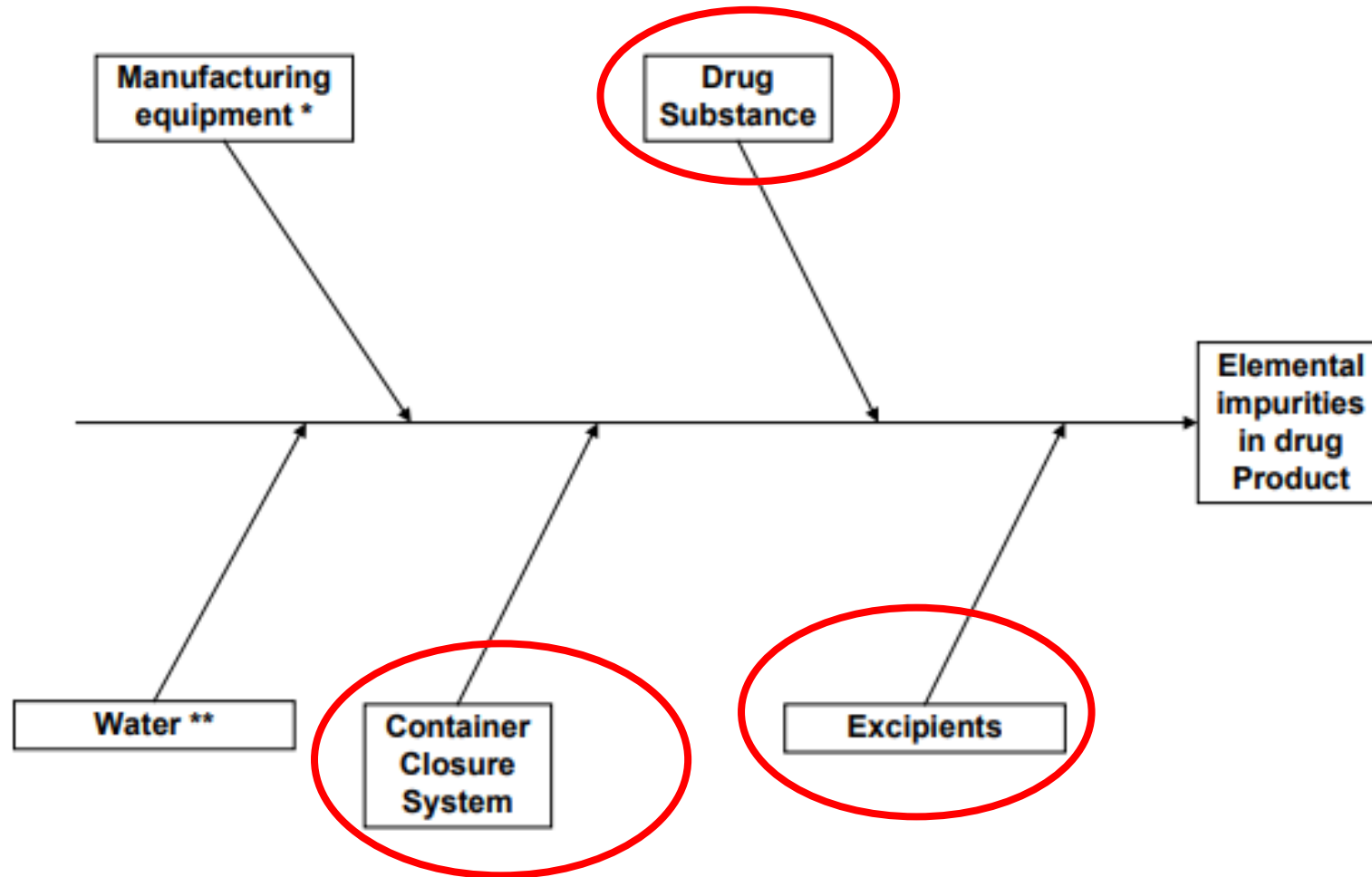
CLASS 2

- Generally considered as route-dependent human toxicants :
 - **Class 2A** : high probability of occurrence, require evaluation during the risk assessment
 - **Class 2B** : reduced probability of occurrence

CLASS 3

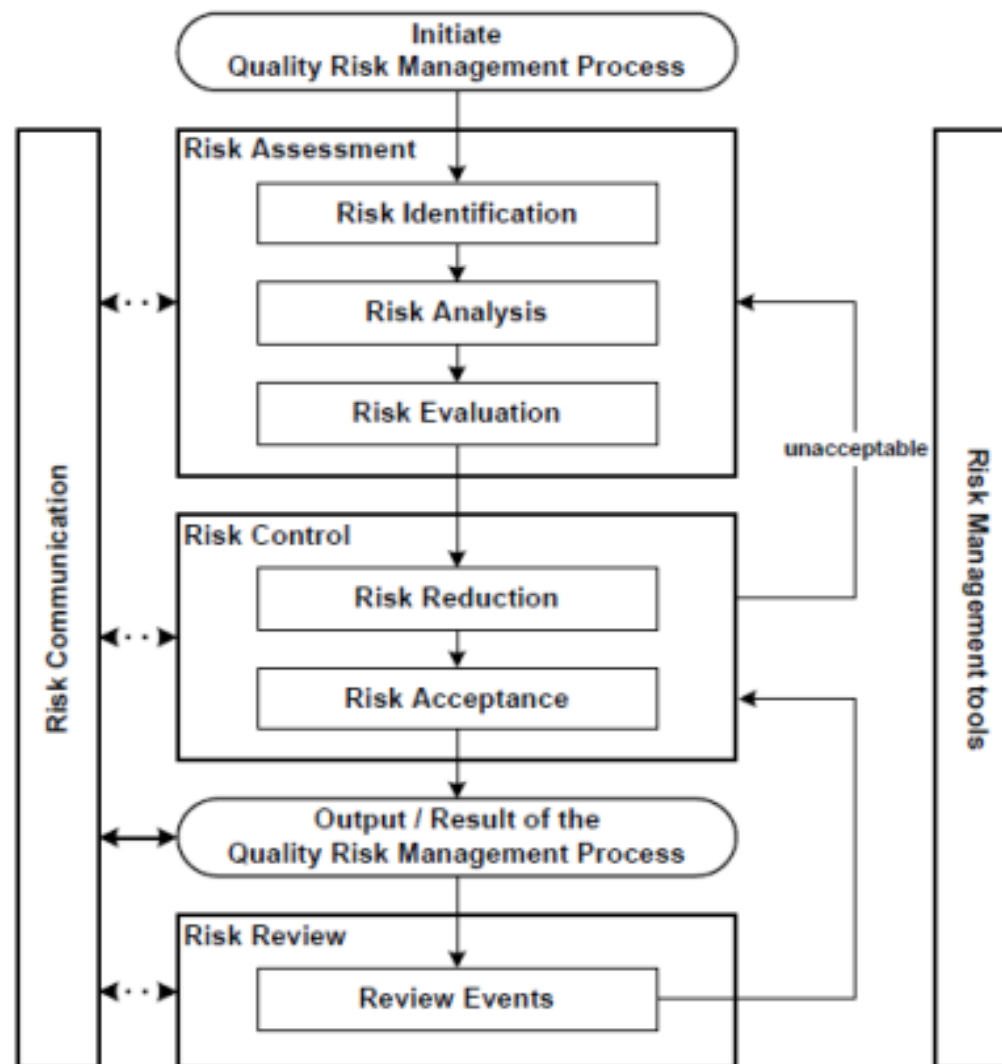
- The elements in this class have relatively low toxicities by the oral route of administration.
- Require consideration in the risk assessment for inhalation and parenteral routes

Inorganic impurities : potentials sources



https://database.ich.org/sites/default/files/Q3D-R1EWG_Document_Step4_Guideline_2019_0322.pdf

Inorganic impurities



https://www.ich.org/fileadmin/Public_Web_Site/ICH_Products/Guidelines/Quality/Q9/Step4/Q9_Guideline.pdf

Inorganic impurities : regulation

Table 5.1: Elements to be Considered in the Risk Assessment

Element	Class	If intentionally added (all routes)	If not intentionally added		
			Oral	Parenteral	Inhalation
Cd	1	yes	yes	yes	yes
Pb	1	yes	yes	yes	yes
As	1	yes	yes	yes	yes
Hg	1	yes	yes	yes	yes
Co	2A	yes	yes	yes	yes
V	2A	yes	yes	yes	yes
Ni	2A	yes	yes	yes	yes
Tl	2B	yes	no	no	no
Au	2B	yes	no	no	no
Pd	2B	yes	no	no	no
Ir	2B	yes	no	no	no
Os	2B	yes	no	no	no
Rh	2B	yes	no	no	no
Ru	2B	yes	no	no	no
Se	2B	yes	no	no	no
Ag	2B	yes	no	no	no
Pt	2B	yes	no	no	no
Li	3	yes	no	yes	yes
Sb	3	yes	no	yes	yes
Ba	3	yes	no	no	yes
Mo	3	yes	no	no	yes
Cu	3	yes	no	yes	yes
Sn	3	yes	no	no	yes
Cr	3	yes	no	no	yes

https://database.ich.org/sites/default/files/Q3D-R1EWG_Document_Step4_Guideline_2019_0322.pdf

Inorganic impurities : regulation

- ❖ The data that support this risk assessment can come from a number of sources that include :
 - Prior knowledge
 - Published literature
 - Data generated from similar processes
 - Supplier information or data
 - **Testing of the components of the drug product;**
 - **Testing of the drug product.**

Inorganic impurities : methods

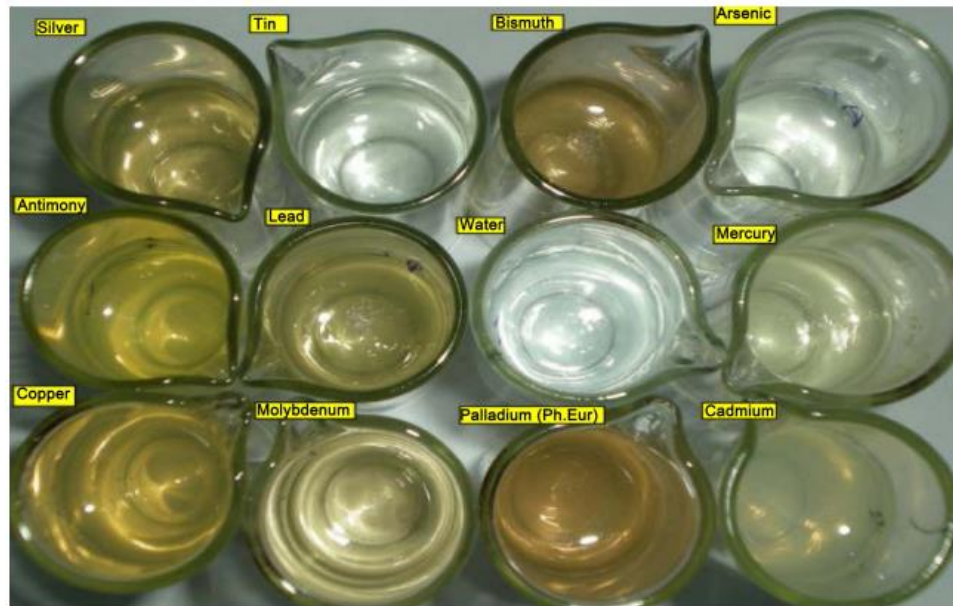
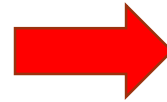


Figure 5. Erroneous reporting of heavy metals as per USP <231> heavy metals [45].

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American Journal of Analytical Chemistry



Current requirements changed and replaced **nonspecific heavy metal tests** with **specific quantifying techniques** and specifications were included

**Non
specific !!**

Inorganic impurities : methods USP

<233> ELEMENTAL IMPURITIES—PROCEDURES

INTRODUCTION

This chapter describes two analytical procedures (*Procedures 1 and 2*) for the evaluation of the levels of the elemental impurities. The chapter also describes criteria for acceptable alternative procedures. By means of validation studies, analysts will confirm that the analytical procedures described herein are suitable for use on specified material.

Use of Alternative Procedures

The chapter also describes criteria for acceptable alternative procedures. Alternative procedures that meet the validation requirements herein may be used in accordance with *General Notices, 6.30 Alternative and Harmonized Methods and Procedures*. Information on the *Requirements for Alternate Procedure Validation* is provided later in this chapter.

Speciation

The determination of the oxidation state, organic complex, or combination is termed *speciation*. Analytical procedures for speciation are not included in this chapter, but examples may be found elsewhere in *USP-NF* and in the literature.

PROCEDURES

• COMPENDIAL PROCEDURES 1 AND 2

System standardization and suitability evaluation using applicable reference materials should be performed on the day of analysis.

Procedure and detection technique: *Procedure 1* can be used for elemental impurities generally amenable to detection by inductively coupled plasma–atomic (optical) emission spectroscopy (ICP–AES or ICP–OES). *Procedure 2* can be used for elemental impurities generally amenable to detection by ICP–MS. Before initial use, the analyst should verify that the procedure is appropriate for the instrument and sample used (procedural verification) by meeting the alternative procedure validation requirements below.



ICP-OES

ICP-MS

Classification of impurities

Residual solvents

❖ **Class 1** : Solvents to be avoided (*human carcinogens, environmental hazards*)

Class 2 : Solvents to be limited (*Non genotoxic animal carcinogen or possible causative agents for other irreversible toxicity*)

Class 3 : Solvents with low toxic potential

ICH HARMONISED GUIDELINE

IMPURITIES: GUIDELINE FOR RESIDUAL SOLVENTS
Q3C(R8)

Current *Step 4* version
dated 22 April 2021

Residual solvents: regulation

ICH HARMONISED GUIDELINE

IMPURITIES: GUIDELINE FOR RESIDUAL SOLVENTS Q3C(R8)

Current *Step 4* version
dated 22 April 2021

TABLE 1. Class 1 solvents in pharmaceutical products (solvents that should be avoided).

<i>Solvent</i>	<i>Concentration limit (ppm)</i>	<i>Concern</i>
Benzene	2	Carcinogen
Carbon tetrachloride	4	Toxic and environmental hazard
1,2-Dichloroethane	5	Toxic
1,1-Dichloroethene	8	Toxic
1,1,1-Trichloroethane	1500	Environmental hazard

Residual solvents: regulation

ICH HARMONISED GUIDELINE

IMPURITIES: GUIDELINE FOR RESIDUAL SOLVENTS Q3C(R8)

Current *Step 4* version
dated 22 April 2021

TABLE 2. Class 2 solvents in pharmaceutical products.

<i>Solvent</i>	<i>PDE (mg/day)</i>	<i>Concentration limit (ppm)</i>
Acetonitrile	4.1	410
Chlorobenzene	3.6	360
Chloroform	0.6	60
Cumene ¹	0.7	70
Cyclohexane	38.8	3880
Cyclopentyl methyl ether ²	15.0	1500
1,2-Dichloroethene	18.7	1870
Dichloromethane	6.0	600
1,2-Dimethoxyethane	1.0	100
N,N-Dimethylacetamide	10.9	1090

Residual solvents: Methods

- ❖ Residual solvents are typically determined using chromatographic techniques such as **gas chromatography**. Any harmonised procedures for determining levels of residual solvents as described in the pharmacopoeias should be used
- ❖ If only **Class 3 solvents** are present, a non-specific method such as **loss on drying** may be used.

Conclusion

❖ Protect the public health by ensuring the safety, efficacy, and security of human and veterinary drugs

❖ Speed innovations that make medical products more effective, safer, and more affordable

 Possible only through regulatory watch and specific and innovative analysis methods in **collaboration** with **experts** and **scientists**

The pharmaceutical industry in Tunisia

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Thank you for
attention