SUMMARY MINUTES

of the

BRITISH PHARMACOPOEIA COMMISSION

A meeting of the British Pharmacopoeia Commission was held via videoconference on Monday 6th November 2023.

Members Present: Dr A M Brady (*Chair*), Dr E Amirak, Dr E Bush, Mr C E Giartosio, Dr A Gleadle (*lay member*), Dr V Jaitely, Mr S Jones, Mr R Lowe (*Vice-Chair*), Dr P Marshall, Ms S Palser (*lay member*), Mr J Rickard, Professor M Simmonds (absent for items discussed under minutes 634 to 636).

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

Also present: Mr J Alam, Dr B Bahsoun, Ms S Begum, Ms S Bowles, Ms H Corns, Dr M Dmitriieva, Ms G Li-Ship, Mr R Smith, Ms S Song, Dr D Tong, Mr M Whaley, and Mr S Young.

629 **Introductory Remarks**

Welcome The Chair welcomed members to the meeting. She also welcomed Ms Sarah Bowles and Dr Basma Bahsoun who had recently joined the BP & Laboratory Services team, and Ms Suzanna Song, who was on a 6-month placement as part of the MHRA Graduate scheme.

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 committeeservicesteam@mhra.gov.uk.

BPC Membership The current term of office for Dr Alison Gleadle and Ms Sharon Palser was due to end on 31st December 2022 at which point they were due to step down from the BP Commission.

The Secretariat was working with the Department of Health and Social Care Public Appointments team to progress the recruitment process for three new technical member and 2 new lay members with a view to them joining the March meeting.

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

Obituary Members were saddened to learn of the death of Dr Andrew Barnes. Mr Barnes had only recently stepped down as a member of the BP Commission and EAG ULM having been appointed in 2020.

I MINUTES

630 The minutes of the meeting held on 10th July 2023 were confirmed.

II MATTERS ARISING FROM THE MINUTES

631 The following matters arising from the meeting held on 10th July 2023 were noted.

Minute 609 – Pyrogen/Bacterial Endotoxin Testing Policy A request for comments from Inspectors had been sent out and a response was awaited. Further discussions on this matter took place during the September 2023 meeting of EAG BIO: Biological and Biotechnological Products.

Minute 609 – BPC Policies and Procedures; Dissolution limits It was agreed that the Aide Memoire and/or Policy List would be updated to include the adoption in dissolution limits, and this would be presented at a future meeting.

Minute 609 – Extractable Volume of Parenteral Preparations Mr Hoare was to raise the proposal for developing pharmacopeial comparison documents at the International Meeting of World Pharmacopoeias informally and would update Commission at a future meeting.

Minute 609 – Branded vs Generic Products Further to sharing the article on the effects of switching between certain branded and generic Parkinson's disease medications, it had also been discussed at the September 2023 meeting of EAG PCN: Pharmacy and Nomenclature. Members agreed to wait for the conclusion of the Agency's investigation prior to taking further action.

Minute 613 Alkyl Sulfonate Ester Impurities The Secretariat had replied to a further FOI request asking for information relating to the BP review of production statements for mesilate-salt products. The Secretariat had also written to EDQM to ask that the EPC considers the strategy for alkylsulfonate impurities considering the new approach taken for nitrosamines.

Minute 616 – Abbreviations and Acronyms for BP Use A list of commonly used abbreviations and acronyms had been finalised and shared on the BP Forum (Posts - British Pharmacopoeia).

Minute 618 – LC-UV Identification: Acceptable Spectra The agreed changes to current guidance on Identification in the Aide Memoire would be incorporated as part of the update detailed in Minute 609.

III REPORTS AND CORRESPONDENCE

GOVERNANCE

632 **Update from the Secretary & Scientific Director**

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

633 **BP workload Analysis** COM(23)33

Mr Hoare provided an update on the BP's Workload since the last meeting in July.

OPERATIONAL

634 **Expert Advisory Groups, Panels of Experts and Working Parties: Membership Review** COM(23)34

Membership review introduction The term of office of all members of the Expert Advisory Groups, Panels of Experts and Working Parties would expire on 31st December 2023. This had been extended from 31st December 2022 at the BPC July 2022 meeting due to several factors which would have made conducting a review at that time challenging. The Secretariat had carried out a full review of membership over the last few months in close collaboration with the Chairs and Vice-Chairs of the relevant groups.

Review of current members The Secretariat and relevant Chairs had reviewed the composition of the current EAGs, Panels and Working Parties to identify those members that should be retained or retired.

Identification and review of proposed new members An advert had been posted on several platforms including social media and on the BP, website inviting individuals who were keen to join one or more of the EAGs or Panels to submit a written expression of interest and a CV. The Commission and current EAG members were asked to raise awareness of the website invitation and several organisations were approached directly.

Proposals relating to each EAG, Panel and Working Party were discussed with the relevant Chairs and Vice-Chairs either by email, telephone or face to face discussion and the finalised proposals for each of the groups were presented.

Proposals The Chairs of the various groups were content with the process and the proposals relating to their specific groups. Commission endorsed the proposals relating to the membership of the following groups: Expert Advisory Groups AIM, BIO, HCM, MC1, MC2, MC3, PCN, ULM; Panels of Experts BLP, CX, IGC, MIC, RAD, VET, VIP; Working Party AQbD, ATMP, DPS. The new terms of office would run from 1st January 2019 to 31st December 2022 and the Secretariat would shortly send out appropriate letters of invitation, re-appointment and thanks to new and existing members.

636 **Sustainability Project: Update** COM(23)35

Mr Young and Ms Song presented a progress report on the BP sustainability project since the last update at the July 2023 meeting.

Sustainability Information Pack The sustainability information pack had been finalised and was ready for publication. Based on feedback received during the public consultation, some further case studies had been added and the title had been changed from “guidance” to “information pack” to avoid any implication that the information reflected regulatory expectation. This position was further reinforced with an advisory note regarding management of any changes made through the user’s GMP or quality system.

The information pack would be published to the BP website behind a free registration page giving visibility to the BP of those accessing the information. A dedicated email address had also been created for interested parties to engage with the BP on sustainability.

BP Laboratory Trials Work was ongoing to assess the benefits for liquid chromatographic methods of utilising solvent recirculation as well as on-system mixing of aqueous and organic solvents. The first project had been completed and members agreed that provided the trials remain successful, these adjustments should be published as case studies in the sustainability information pack.

Sustainability in Monographs The BP Laboratory piloted scaling methods for the Solifenacin Oral Suspension monograph with adjusting chromatographic conditions. Discussion by a group of chromatographic experts concluded that validated conditions should remain official, with adjusted conditions documented in the "more information" tab and agreed to draft a protocol for wider adoption.

BPCRS Packaging Change It was noted that the primary packaging used for BPCRS shipments had been changed to reduce its environmental impact. Prior to implementing the change, risk assessments had been undertaken and customers notified of the change. No negative feedback received to date and this change to packaging had also been included as a case study in the information pack.

637 **BP Laboratory** COM(23)36

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

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

IV FUTURE PUBLICATIONS

638 **BP Website Redevelopment** COM(23)37

The new Beta version of the pharmacopoeia.com website had been released in August 2023 with a brand-new format for the British Approved Names (BAN) publication due to be released to the Beta version shortly.

The Legacy site would be replaced by the new version with members encouraged to use the Beta site and provide feedback.

639 **Priority work programme paper** COM(23)38

Background An update on the delivery of new and revised monographs across all EAGs for BP priority work programme, first presented to BP in November 2021 and last updated in November 2022 meeting, was provided for information.

Patient criticality information sources An update on the status of new and revised monographs across all the EAGs was provided for information. The list of critical medicines being developed by the Department of Health and Social Care Medicines Supply team was still to be finalised and would be reflected in a future update of the work programme. Additionally, the 2023 update of the WHO Essential Medicines List and a list by the French Government of 450 essential medicines had also been used to prioritise monographs. The intention was to add all the identified monographs to EAG work programmes, with the prioritisation acting as a guide for assigning to EAGs and co-ordinating workloads.

639.3 **Next Steps** Members endorsed the proposal to adopt the monographs identified through the three medicines lists to the BP work programme and the Secretariat would co-ordinate the addition of the these to individual EAG work programmes. This would consider the previous development of family monographs by an EAG and the progression of high priority monographs that were identified based on UK usage of medicines.

Further analysis of the DHSC medicines list would also be carried out with the aim of developing a review programme of existing monographs for the medicinal products to ensure that robust standards, are aligned with current regulatory expectations, were in place.

As had been highlighted in previous monograph portfolio updates, there were several highly used medicines for which the development of drug substance monographs had not begun or added to the Ph. Eur. work programme. Where the absence of a drug substance monograph for medicines in the DHSC list had been identified, these would be included in efforts to support development of these monographs to ensure a pipeline of standards for widely used and/or critical medicines in the UK is in train.

640 **Working Party ATMP: Progress Report** COM(23)39

Introduction Following the update provided at the July meeting, the two Advanced Therapy Medicinal Product (ATMP)-related guidance documents had been further developed and were intended to be published on the BP Website. The topics covered by the guidance documents had been agreed upon by WP ATMP during their 3rd meeting in April 2021, and subsequently authored by two subgroups consisting of subject matter experts. Both documents had already been through several reviews and a final version was available on the BP forum.

Characterisation of the Capsid Particle Population in rAAV Products This guidance document facilitates the comprehensive characterisation of capsid particle populations in recombinant Adeno-Associated Virus (rAAV) products. The document provides a toolbox of analytical methods for the user to consider that enables the analysis of full, empty, and partially full capsids. These methods help ensure the quality and safety of rAAV products.

T Cell and NK Cell Characterisation Assays The T Cell and NK Cell Characterization Assays guidance document focuses on the critical aspect of T cell and Natural Killer (NK) cell characterisation within ATMPs. It aims to equip users with essential information to develop potency assays for ATMPs involving T and NK cells. The document offers insights into best practices and established industry protocols for robust potency assessment.

Members endorsed the publication of these documents to the BP website.

V ANALYTICAL ISSUES

None.

VI EXPERT ADVISORY GROUPS / PANELS OF EXPERTS

641 Expert Advisory Group MC1: Medicinal Chemicals COM(23)40

The report of the EAG MC1 meeting (20:07:23) was endorsed and the following points were raised.

Trihexyphenidyl tablets The chromatographic method was harmonised across the dissolution and related substances tests and the Assay as was the resolution requirement. The concentrations of the System Suitability Test (SST) solution however varied across the tests making it more difficult to pass the resolution for the Related substances test. The Secretariat would develop a common approach to SST solutions for inclusion in the aide memoire.

Paracetamol Preparations It was noted that family of paracetamol monographs had been published for public consultation and were scheduled for publication in the BP2025.

642 Expert Advisory Group MC2: Medicinal Chemicals COM(23)41

The report of the EAG MC2 meeting (21:06:23) was endorsed and the following point was raised.

Mebeverine Tablets It was brought to members' attention that the BP Laboratory had reported significant difference in the dissolution profiles of film-coated and sugar-coated tablets and so MC2 were adopting limits specific to each coating, which had been agreed with the pharmaceutical assessors.

643 **Expert Advisory Group PCN: Pharmacy & Nomenclature** COM(23)42

The report of the EAG PCN meeting (06:09:23) was endorsed and the following point was raised.

Standard Term: Capsules for Opening It was noted that the proposed term had been received for a product where the capsule was not meant to be swallowed, but instead opened and the contents removed. The EAG had expressed concerns which were to be relayed to Group 12.

644 **Expert Advisory Group AIM: Anti Infective Medicines** COM(23)43

The report of the EAG AIM meeting (07:09:23) was endorsed and the following point was raised.

644.1 **Flucloxacillin Oral Solution** It was noted that the Flucloxacin Oral Solution products were granules for reconstitution prior to administration. As per BP Policy, the reconstituted shelf-life was controlled between 80 – 120% of label claim but many products could control this tighter. The EAG had therefore requested that this policy be reviewed.

645 **Expert Advisory Group BIO: Biological & Biotechnological Products** COM(23)44

The report of the EAG BIO meeting (21:09:23) was endorsed and the following point was raised.

645.1 **Iron Dextran Injection** Members welcomed the removal of an animal test from the monograph following correspondence with manufacturers that the test was no longer required.

VII EUROPEAN PHARMACOPOEIA

646 **European Pharmacopoeia Update** COM(23)45

European Pharmacopoeia Commission The 176th Session of the EP Commission had taken place in June 2023 and had been attended by the UK delegation in person.

Strategy for nitrosamine impurities in individual monographs and mesylates proposal An overview of the strategy for N-nitrosamines was presented for information. Following discussions at the July meeting of the BP Commission, a letter had been sent to EDQM from the UKD requesting that similar consideration be given to alkyl sulfonate ester impurities.

Extractable elements in plastic materials (2.4.35) Following the presentation on general chapter 2.4.35. Extractable elements in plastic materials at the 176th Session of the EPC, the NPAs' opinion on how best to proceed with this text had been requested. The NPAs had proposed to keep values in the general chapter but label them as targets and allow for deviations if justified and authorised. This topic was expected to be discussed at 177th Session of the EPC.

Monoclonal antibodies stakeholder engagement At the 176th Session of the EPC it was agreed to undertake stakeholder consultation on Monoclonal Antibodies (Mabs) as part of the conclusion of the MAB pilot phase. The UKD had been consulted on the survey approach, which it found to be acceptable and was expected to be published as part of Pharmeuropa 36.1 (January to March 2024).

UK Membership of expert groups of the European Pharmacopoeia Commission Members were informed of several experts who had been nominated to represent the UK on four expert groups of the European Pharmacopoeia Commission.

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

647 **International Update** COM(23)46

Members were provided with an update on international activities.

Indian Pharmacopoeia Mr Hoare and Mr Crowley had met virtually with representatives from the Indian Pharmacopoeia to further discussions around a joint programme for development of new monographs and standards as well as other collaborative opportunities.

International Meeting of the World Pharmacopoeias Mr Hoare and Mr Whaley were to represent the British Pharmacopoeia at this WHO meeting, to be held in Mexico City in November.

Expert Committee on Specifications for Pharmaceutical Preparations Mr Crowley and Ms Corns had attended this WHO meeting virtually, at which guidelines were presented for adoption covering many aspects of pharmaceutical preparation.
National Pharmacopoeial Authorities (NPAs) meeting Various scientific and operational matters were discussed by the NPAs at this regular virtual meeting.

647.6 **United States Pharmacopeia** Monthly teleconferences between the BP and the USP were being held to continue discussions on areas of mutual interest, including monograph development and harmonisation, Analytical Quality by Design, and the upcoming International Meeting of the World Pharmacopoeias.

IX ANY OTHER BUSINESS

648 **Proposed Themes for Inclusion in BP Aide Memoire for Development and Amendment of Monographs and/or Policy** COM(23)47

Mr Jones presented a proposal for incorporation of four themes into the BP Aide Memoire and/or Policy List. These additions would be considered as part of the next review of the Aide Memoire.

649 **Observer discussions**

Members discussed the feasibility of a request from a pre-registration pharmacy student to observe a BPC meeting. The Secretariat agreed to consider developing a policy which would allow stakeholders to observe Commission meetings.

650 **Date of next meeting**

March 2024 date to be confirmed.

FOR INFORMATION:

651 **British Pharmacopoeia 2025: Text Review Dates**

The dates for reviewing the BP 2025 and BP (Vet) 2025 text using the document review tool (DRT) were provided for information.

652 **Actions Log**

A list of actions from previous meetings of the Commission was provided for information.

653 **Items for Future Meetings**

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