

# **Development, Characterization, and Evaluation Considerations of Particle Analysis to Support Generic Product Quality and Bioequivalence Determination**

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CDER | U.S. FDA

# Pharmaceutical Quality



**A quality product of any kind consistently meets the expectations of the user.**



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**A quality product of any kind consistently meets the expectations of the user.**



**Drugs are no different.**

A close-up photograph of a person's hands. The left hand holds an orange plastic pill bottle, tilted to pour three white, oval-shaped pills into the palm of the right hand. The background is blurred, focusing attention on the action of taking medication.

**Patients expect safe and effective  
medicine with every dose they take.**

A close-up photograph of a person's hands. The left hand holds an orange plastic pill bottle, tilted to pour three white, oval-shaped pills into the palm of the right hand. The background is blurred, focusing attention on the action of dispensing the medication.

Pharmaceutical quality is  
assuring *every* dose is safe and  
effective, free of contamination  
and defects.



It is what gives patients confidence  
in their *next* dose of medicine.

# OPQ's Proactive Science and Research Approach



- The **science program** is designed to maintain preparedness
  - Consumer complaints
  - Public health issues
- The **research program** is “forward looking”
  - New and emerging technologies for analytics and manufacturing
  - Advanced analytics (instrument and modelling)
  - Forecasting generics for newly-approved new drug applications (NDAs)
  - Complex Drugs in new molecular entity (NME) and generic drugs



# OTR's Role in Generic Drug Science

- Laboratory consults
  - Method evaluation (verification)
  - Product quality
  - Pharmaceutical equivalence and bioequivalence (in vitro approaches)
- Training
  - Provide training to quality assessment staff
- Guidance and Standard development
  - Provide scientific information to support product-specific guidances (PSG) and general guidances
  - Develop improved test methods for quality and equivalence standards



# Outline

- The need and challenges associated with particle characterization
- Common techniques for particle size distribution (PSD)
- Common issues (during evaluation)
- Examples

# Particle Characterization: the Need

- Particle size is an important product quality attribute for formulations in a dispersed state, e.g., emulsions, suspensions, liposomes, colloidal iron
- Also a critical physicochemical property in supporting the bioequivalence (BE) determination (in vitro option), e.g., budesonide suspension, cyclosporine emulsion
- Concerns with products of a wide range of sizes (e.g., 10 nm to 100  $\mu\text{m}$ ) and with different distributions (e.g., unimodal or multi-modal)

Contains Nonbinding Recommendations  
Draft Guidance on Cyclosporine

This draft guidance, once finalized, will represent the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind the FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the Office of Generic Drugs.

Active ingredient: Cyclosporine

Form Route: Emulsion/Ophthalmic

Recommended study: 2 Options: *In Vitro* or *In Vivo* Study

**I. In Vitro option:**

To qualify for the in vitro option for this drug product pursuant to 21 CFR 314.101, which "any other approach deemed adequate by FDA to measure bioequivalence" may be acceptable for determining the bioavailability of a drug product, all of the following criteria must be met:

- The test and Reference Listed Drug (RLD) formulations are qualitatively same (Q1/Q2).
- Acceptable comparative physicochemical characterization of the test and reference products. The comparative study should be performed on at least three lots of both products.

Parameters to measure: Globule size distribution, viscosity, pH, and surface tension.

Contains Nonbinding Recommendations  
Draft Guidance on Budesonide

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Active ingredient: Budesonide

Form Route: Suspension Inhalation

Recommended studies:

**1. Testing Requirements for the Highest Strength (1 mg/2 mL) Product:**

The generic budesonide suspension/inhalation product must be qualitatively (Q1) and quantitatively (Q2) the same as the reference listed drug product (RLD).

**Option A. In Vitro Bioequivalence Studies Alone:**

The following in vitro comparative tests are recommended. Part L-C Plus Nebulizer/Part Master compressor system is recommended for those tests requiring nebulization. The tests include:

- 1) Sameness of polymorphic form of the drug substance based on X-ray diffraction.
- 2) Sameness of shape (crystalline habit) of the drug substance.
- 3) Comparative Unit Dose Content (UDC) of drug in the ampules.
- 4) Comparative Mean Nebulization Time (MNT) and Mean Delivered Dose (MDD): The test should be conducted at the mouthpiece (% nominal dose) at the labeled flow rate of 5.5 L/min through each time that must be no longer coming out of the mouthpiece.
- 5) Comparative drug particle and agglomerate Particle Size Distribution (PSD) in the

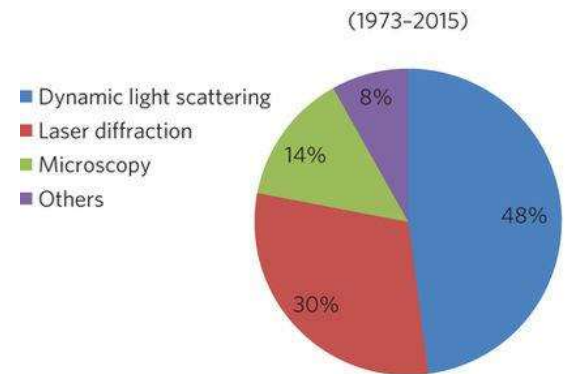
# Particle Characterization: the Challenges

- The analysis of the particle size is not an objective in itself, but is a means to an end
  - ☐ Physical stability
  - ☐ Dissolution/drug release
  - ☐ Bioavailability
  - ☐ Process capability
  - ☐ Bioequivalence
- Many factors could impact the PSD, in both method development and evaluation, e.g.,
  - ☐ Choice of the dispersion medium
  - ☐ Sample preparation procedure (e.g., dilution, sonication)
  - ☐ Instrument/software setting (e.g., laser power, measurement position, stirring speed, sonication, optical inputs, analysis algorithms)
  - ☐ Reporting (equivalent spheres, cumulant vs. distribution, meaning of means)
  - ☐ Trueness and precision (what to validate?)
  - ☐ Formulation specific considerations (e.g., **excipient interference**)

# Common Techniques to Determine Particle Size Distribution



Technique	Size range	Shape	Resolution (1-5, relative scale)	Principle
Electron microscopy	0.1 nm to a few micron	Y	5	Electron density contrast
Homodyne/Heterodyne dynamic light scattering (DLS)	1 nm to 1 $\mu\text{m}$	N	2	Brownian motion + light scattering
Field flow fraction (FFF) + multi-angle light scattering (MALS) + DLS	1 nm to a few micron	N	5	Brownian motion + flow based separation + light scattering
Nanoparticle tracking analysis (NTA)	20 nm to 1 $\mu\text{m}$	N	4	Brownian motion + image analysis
Resonant mass measurement (RMM)	50 nm to 5 $\mu\text{m}$	N	4	Buoyant mass
Laser diffraction (LD)	30 nm to 3000 $\mu\text{m}$	N	3	Static light scattering (Mie or Fraunhofer)
Light obscuration	Subvisible particles (0.5 $\mu\text{m}$ to 400 $\mu\text{m}$ )	N	4	Single particle light blockage
Image analysis	1 $\mu\text{m}$ to a few hundred micron	Y	4	Image analysis
Focused Beam Reflectance Measurement	1 $\mu\text{m}$ to 1000 $\mu\text{m}$	N	4	Chord length



S. D'Mello, et al. *Nature Nanotechnology*, 2017, 12, p.523-529

## Points to consider:

- Sensitivity (e.g., formulation, process changes) and specificity (e.g., any interference?)
- Single technique (robustness) vs. complementary techniques (strength/limitation of each one, comparison)

# Common Deficiencies



- Incorrect choice of the instrument or technique, e.g., choosing laser diffraction (LD) for measuring particle size of colloidal iron product.
- Incorrect use of material/dispersant refractive index (RI), especially if reported based on distribution analysis (DLS).
- Not clear on which analysis was used, e.g., cumulant vs. distribution (DLS).
- Intensity- weighted distribution is always recommended; use volume- weighted distribution only if it is adequately justified; and avoid the use of number- weighted distribution (DLS).
- Validation performed incorrectly using only the reference standard (e.g., NIST standard); should use actual samples (RLD samples are also ok)
- Method precision (i.e., repeatability, reproducibility, robustness) is not demonstrated in the validation.
- Lack of method details, such as measurement position, attenuator settings, cuvettes (DLS).
- Sample preparation missing critical details or lack of justifications, e.g., if the dispersion medium has been saturated with the drug before measuring using LD, lack of justification for use of sonication.

# Impact of the Dispersion Medium

- ❑ **Particle** exists in one of three forms: *gas*, *liquid*, or *solid*.
- ❑ Though not specifically mentioned, a particle should always be discussed in the context of its dispersion medium (either gas or liquid, solid is rare).

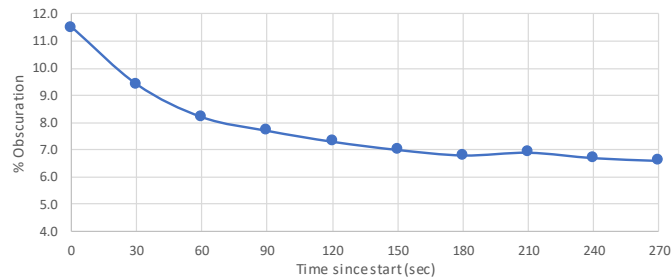
Particle State	Medium	Examples
Solid	Gas	Powders, granules, aerosols
Solid	Liquid	Suspensions, glass-lamella, other particulates
Liquid	Liquid	Emulsions (O/W or W/O), nano-emulsions, multiple-emulsions (e.g. W/O/W)
Liquid	Gas	Nasal spray (liquid)
Solid/liquid (soft-matter)	Liquid	Liposomes, micelles



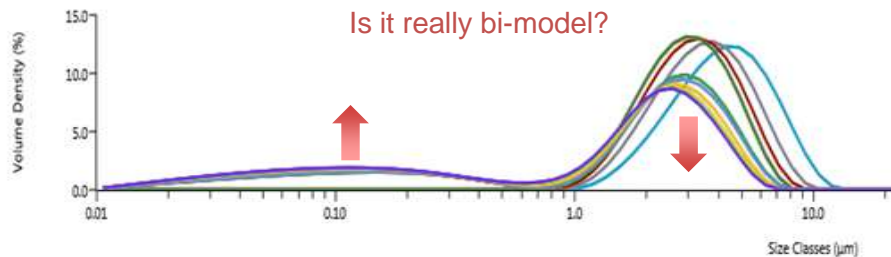
- ❑ Proper sample presentation is critical to ensure accurate and consistent particle size measurement. Most common dispersing medium is liquid. For solid samples, changing it's native dispersing medium may change particle stability (e.g., aggregation, dissolution), and hence the sample preparation procedures need to be carefully examined.

# Impact of the Dispersion Medium (cont.)

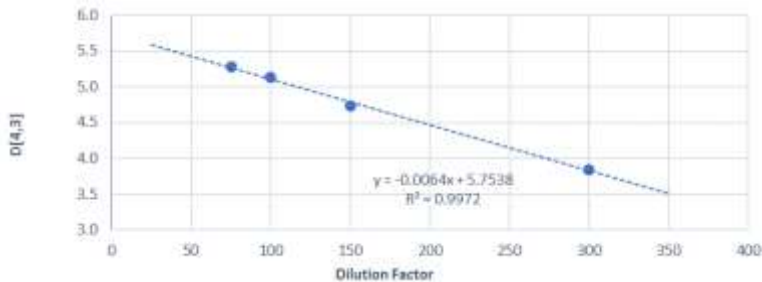
Possible signs that the dispersion medium is not ideal (examples):



Decreasing trend in %obscuration during the measurement (applicable to LD technique)



Appearance of a secondary smaller particle population, and accompanied by the reduction of the primary (larger) particle population



Decreasing trend of particle size upon dilution

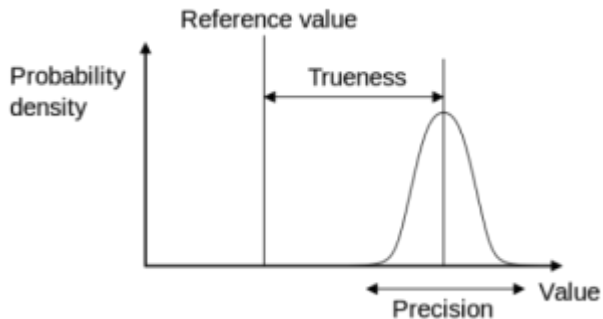
Possible causes:

- **Drug particles are dissolving during measurement**
- Drug particles are not stable (e.g., aggregation, sedimentation)

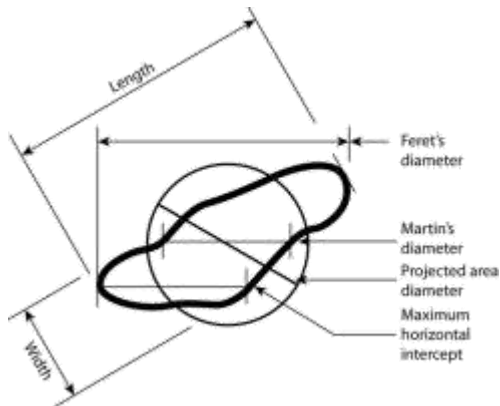
Solutions:

- **Pre-saturate the dispersion medium with the drug**
- Addition of wetting agents and/or electrolyte (to increase electrostatic repulsion)

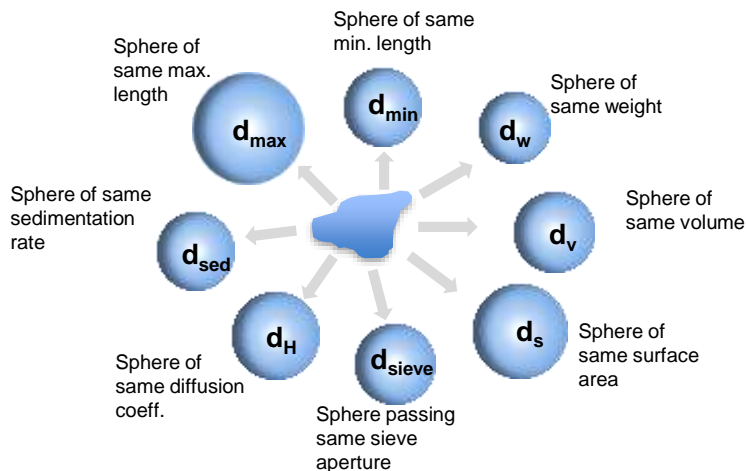
# Particle Size Evaluation: Trueness and Precision



ISO 5725: “trueness” and “precision” to describe the accuracy of a measurement method.



- ❑ Particles are 3-dimensional objects, and unless they are perfect spheres (e.g., oil globules, liposome vesicles, micelles, or air bubbles), they cannot be fully described by a single dimension such as a radius or diameter
- ❑ Concept of equivalent spheres (may not always be the most appropriate, e.g., for needle shaped particles)
- ❑ Different measurement technique assumes different equivalent sphere models, and hence may not necessarily give exactly the same results



USP <776> Which one is true size?



## Particle Size Evaluation: Precision (3R)

- It is important to demonstrate the method precision as part of the method validation, to show the procedure is suitable for its intended purpose.

**Repeatability:** closeness of agreement between multiple measurement results of a given property in the same dispersed sample aliquot, executed by the same operator in the same instrument under identical conditions within a short period of time (e.g., 6 measurements for the same sample).

-Machine, Testing method, Sample stability

**Reproducibility:** closeness of agreement between multiple measurement results of a given property in different aliquots of a sample, prepared and executed by same or different operators in similar instruments according to the same method (e.g., 6 samples prepared by the same operator).

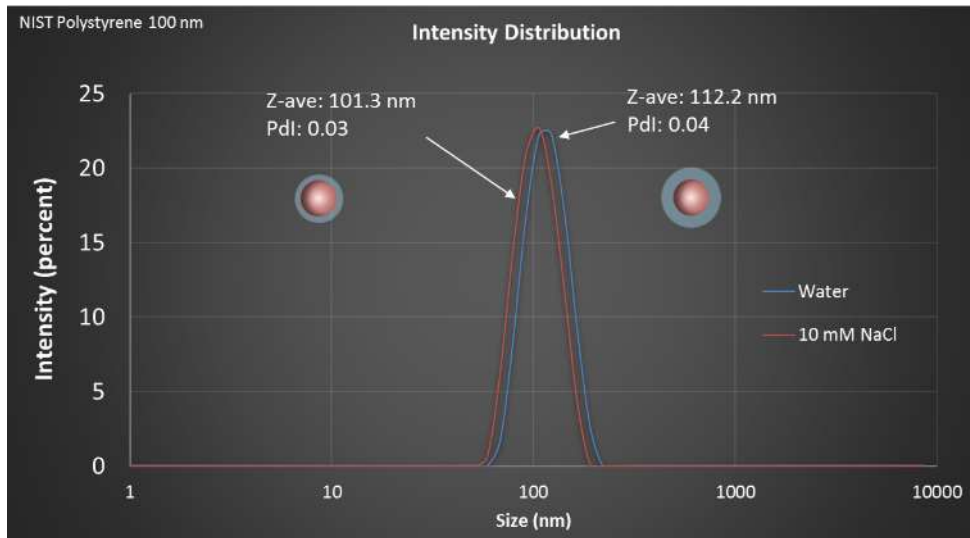
-Sampling procedure, dispersion, machine

**Robustness:** reliability of an analysis with respect to deliberate variations in method parameters, i.e., it should be both sensitive (able to detect significant changes in the underlying measured parameter) and precise (repeatable with a high signal to noise ratio). For example, change in sonication power, sonication duration, flow rate, particle concentration (i.e., obscuration%), temperature, analysis algorithm.

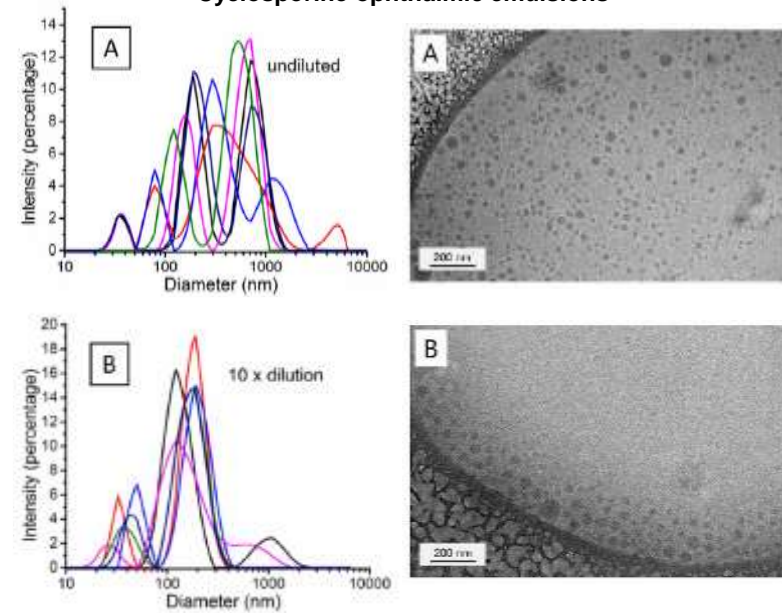
# Impact of Dilution (Media Type and Dilution Factors)

Dilution could change the size measurement results in different ways, e.g.,

- 1) Change in structure/properties of the investigated particles
- 2) Change in the particle environment



## Cyclosporine ophthalmic emulsions

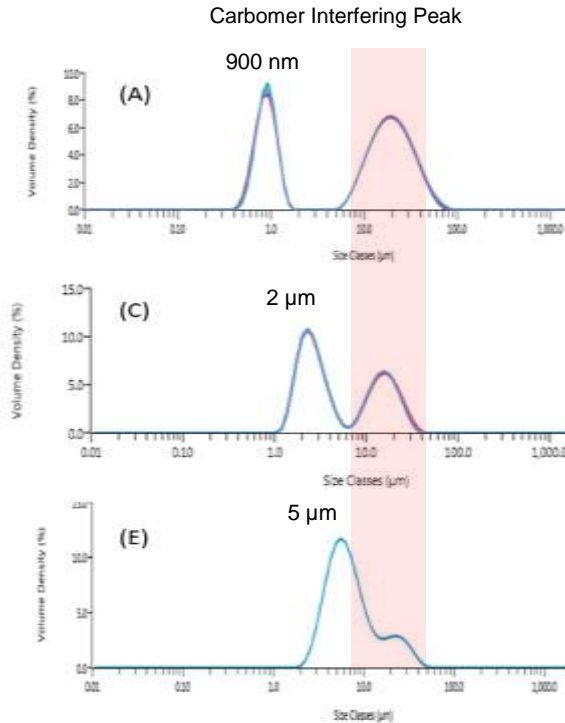


P. Petrochenko, et al. Analytical Considerations for Measuring the Globule Size Distribution of Cyclosporine Ophthalmic Emulsions. *International Journal of Pharmaceutics* (2018). 550(1-2), 229-239.

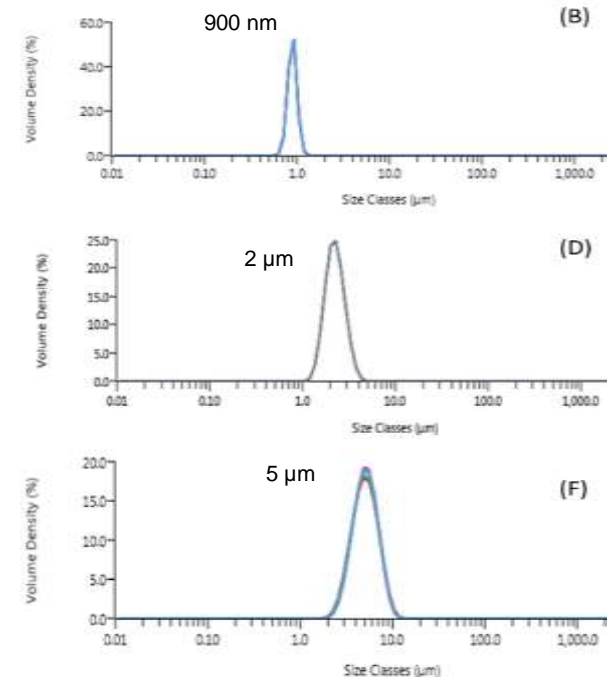
# Method Interference (Excipients)



Formulation excipients (e.g., polymers, surfactants) may interfere with the size analysis, resulting high variability and erroneous results. For example, in an ophthalmic suspension formulation, presence of carbomer (a viscosity enhancer) was found to interfere with the laser diffraction measurement (demonstrated below using NIST standards with known sizes). The size of the API particle was close to 5  $\mu\text{m}$  which overlapped with the excipient interfering peak.

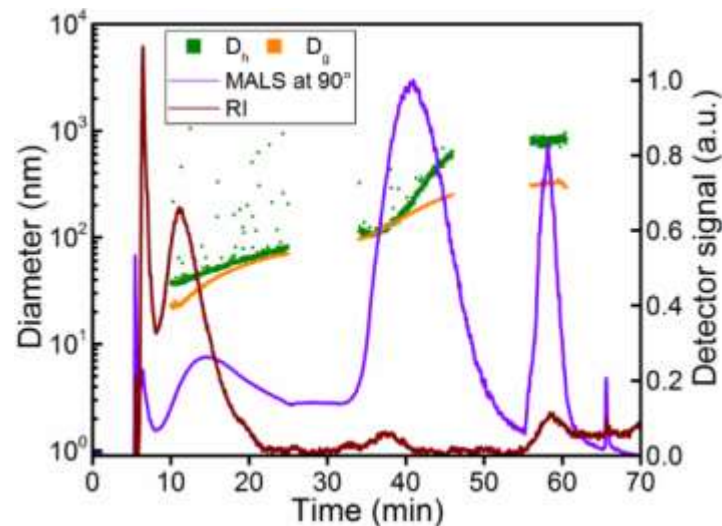
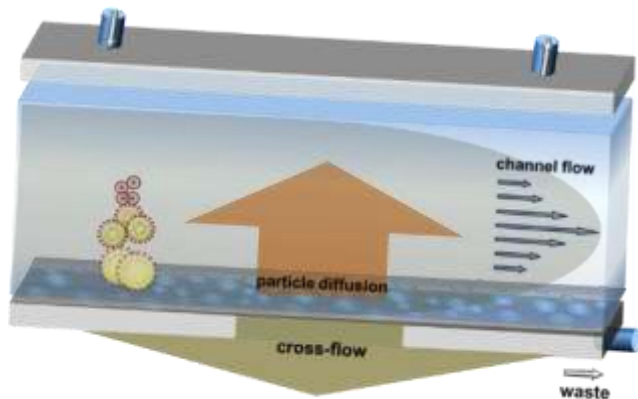


Interference  
eliminated by using  
the Placebo  
formulation as a blank



# Other Particle Sizing Methods

## Asymmetrical-Flow Field Flow Fractionation (AF4) to Analyze Emulsions



- ❑ Mild separation condition allowed delicate samples to be analyzed in their original state
- ❑ AF4: First globule population **30-80 nm**, second population **100 -600 nm**
- ❑ For comparison, DLS shows Z-ave of **110 to 120 nm**, cryoTEM (**20-60 nm**), DOSY NMR (**70 nm**)

# Summary



- Particle size is one of the critical quality attributes that also affects the BE
- Do not underestimate the challenges of characterizing particle size
- Every particle sizing technique has its strengths and limitations (welcome new techniques which provide better understandings)
- It is important to ensure the method is properly developed and adequately validated
- Correct interpretation of the result relies on full and complete information of the method

