

# **Continuous Manufacturing of Drug Product**

**Arwa El Hagrasy, Ph.D.**

Acting Quality Assessment Lead

Office of Pharmaceutical Manufacturing Assessment OPQ,  
CDER

**Pharmaceutical Quality Symposium, CDER SBIA  
October 16-17, 2019**

# Outline

- Introduction
- Implementations of continuous pharmaceutical manufacturing
- Control strategy considerations
- Facility considerations
- Conclusions

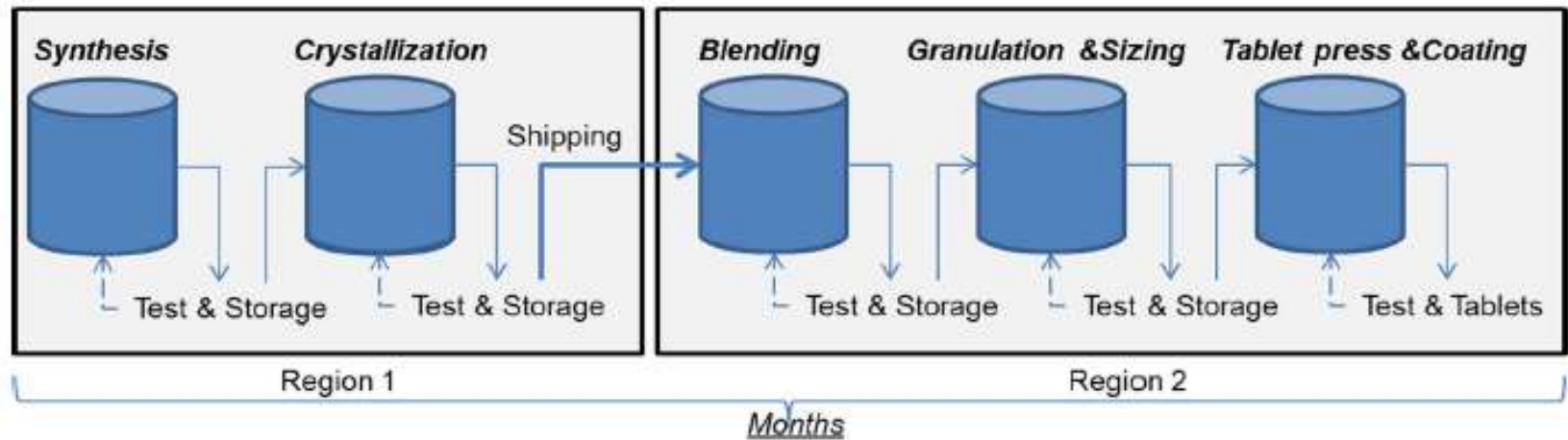
# Learning Objectives

- Describe operational and control strategy differences between batch and continuous drug product manufacturing
- Explain importance of material control for a continuous manufacturing process
- Identify factors impacting mixing dynamics in a continuous manufacturing line
- State at least one factor impacting in-process measurements
- Recognize role of pharmaceutical quality system in a continuous manufacturing environment

# Pharmaceutical Manufacturing



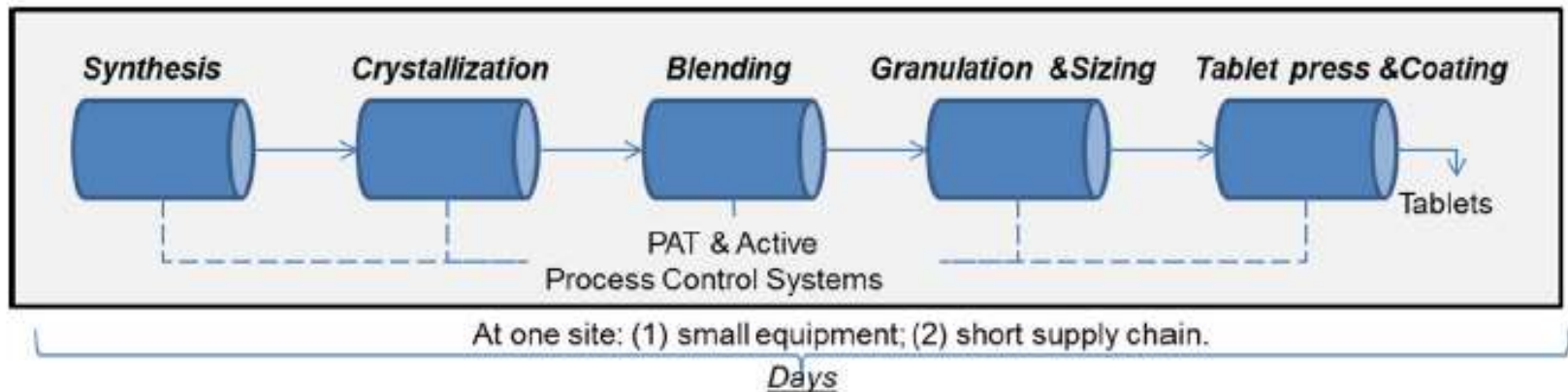
## *A Typical Batch Manufacturing Process*



- Discrete unit operations
- In-process material are collected/tested at the end of each unit operation
- Hold time studies allow for investigation

# Pharmaceutical Manufacturing

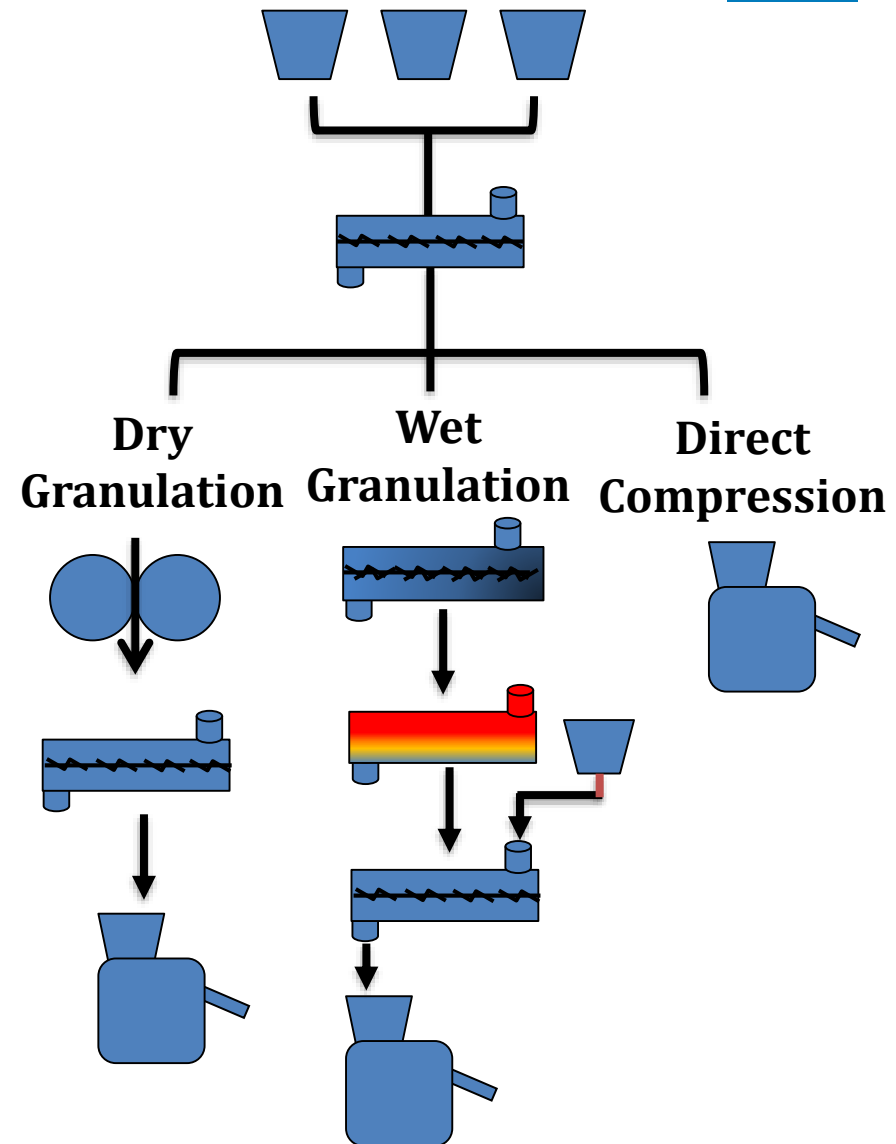
## *A Conceptual Integrated Manufacturing Process*



- Integrated unit operations
- Material is constantly generated and flowing between unit operations
- Process is monitored during processing
- Data-rich manufacturing environment

# CM Platforms for Drug Product

- Different manufacturing processes can be implemented
- Equipment of the same or different operating principles compared to batch processing
- Different control strategy considerations for an integrated continuous manufacturing process



# Aspects of CM Implementation

## Process Design

- Engineering design
- Process dynamics
- Equipment configuration
- Critical control points

## Batch and Lot Definition

- Batch size definition
- Throughput rate(s)
- Yield & rejection limits

## Control Strategy

- Raw material control
- Process monitoring & control (e.g. RTD/PAT models)
- Sampling strategy
- Start-up & shut down
- Product collection & diversion

## Facility Implementation

- System integration, equipment qualification & cleaning
- Process performance qualification
- Data processing & management
- Model maintenance & update
- Process verification

# State of Control

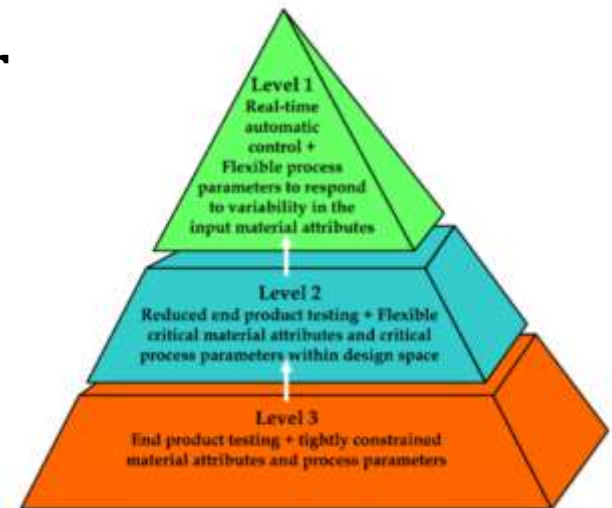
- A planned set of controls, derived from current product and process understanding that assures product performance and product quality
- Comprehensive Control Strategy for CM:
  - Material attributes of drug substance and drug product components
  - Facility and equipment operating conditions
  - In-process controls
  - Finished product specifications
  - Methods and frequency of monitoring and control
- CM requires different control strategy than batch processes





# Implementation Options for Control Strategy

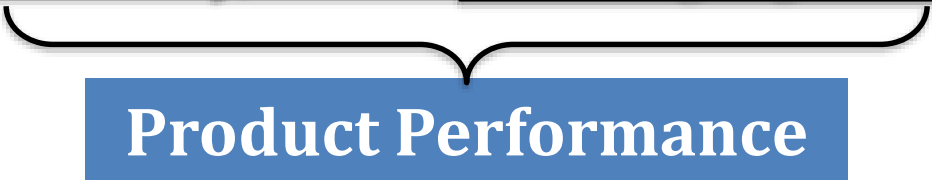
- **Level 1:** Active control system with real time monitoring of process variables and quality attributes
- **Level 2:** Operation within established ranges (multivariate) and confirmed with final testing or surrogate models.
- **Level 3:** Unlikely to be operationally feasible for addressing natural variance in CM without significant end product testing.



*Yu LX, et. al. The AAPS Journal. 2014.*

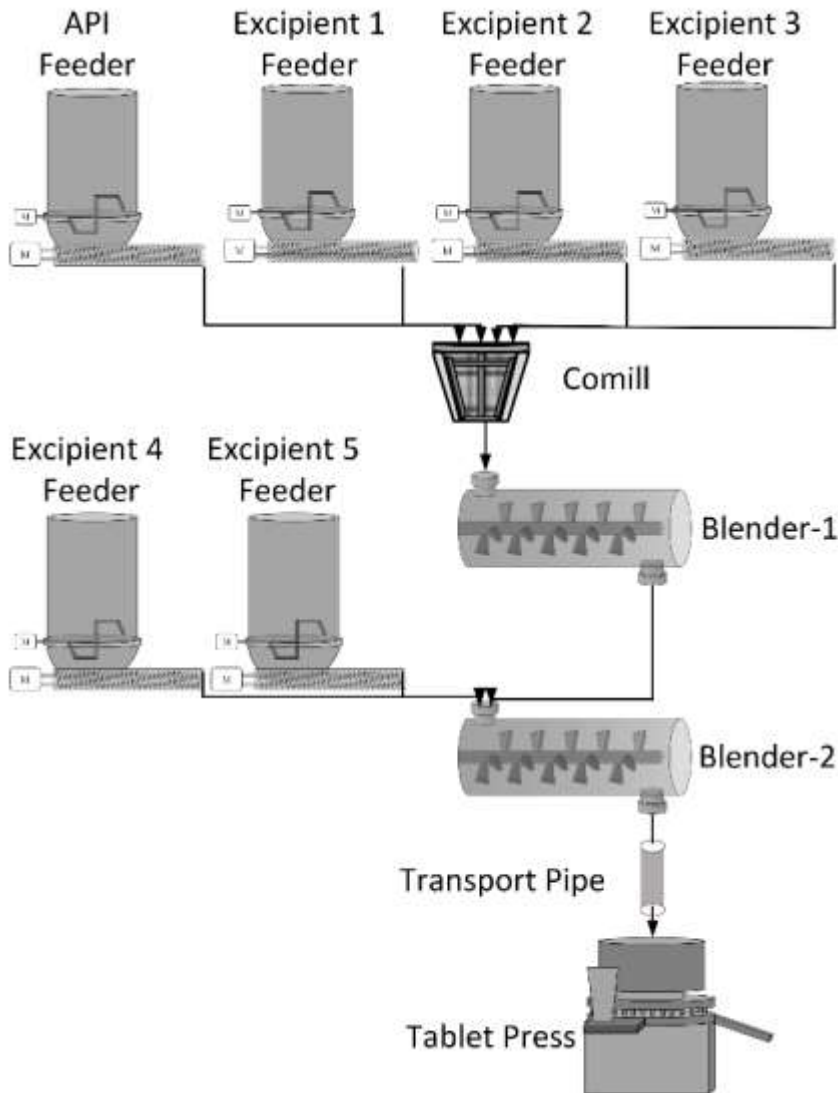
# Impact of Raw Material Attributes

Material Attributes	API, Process & Product Design Considerations
<ul style="list-style-type: none"> <li>• Particle Size Distribution</li> <li>• Shape</li> <li>• Density</li> <li>• Friction Angle</li> <li>• Flow Function</li> <li>• Powder Cohesivity, ...etc.</li> </ul>	<p>BCS classification</p> <p>Drug Load</p> <p>Excipient Ratios</p> <p>Feed flow consistency</p> <p>Process dynamics</p> <p>Segregation potential</p>



***A Risk-Based Approach is Recommended in Establishing Criteria for Raw Material***

# Considerations of Material Attributes



**Hopper Design-** consider bulk density, wall friction, cohesive strength of the material to ensure mass flow.

**Feeder** - Initial feed factor, feeding performance, and deviations during refill can be dependent on material flow properties.

**Mixer** - Tracers used for characterizing Residence Time Distribution (RTD) need to have similar bulk properties with the bulk.

**Tablet press** - Tablet weight uniformity can be impacted by flow properties of in-process material.

# Raw Material Attributes and Risk to the Process and Product



- Material attribute control is important for continuous feeding and developed PAT/process models
- Impact of lot to lot variation in material attributes
  - Accuracy and precision of material feeding
  - Mixing dynamics (RTD) and downstream processes
  - Predictability of in-process and/or RTRT PAT models

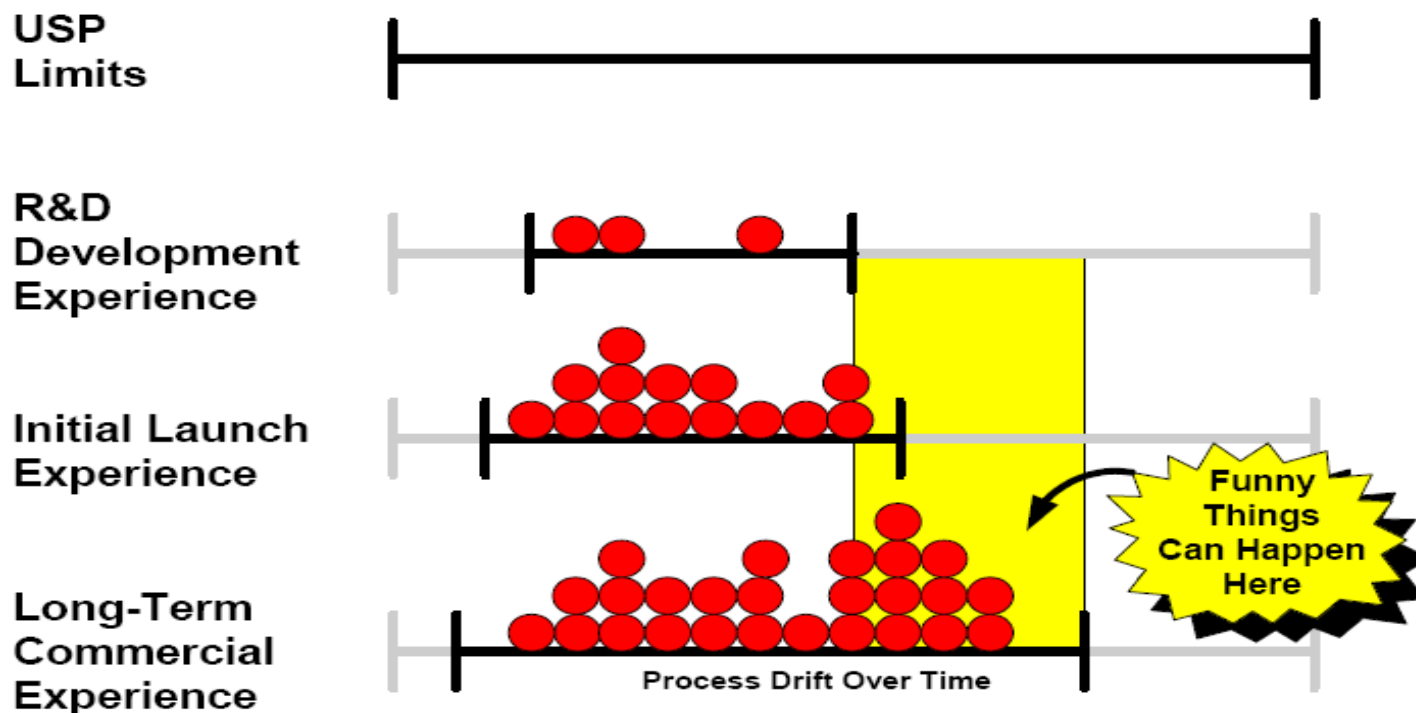
## Drug Product CQAs

Assay

Content Uniformity

Dissolution

# Lot to Lot Variation Over Product Lifecycle



# Considerations for Raw Material Control

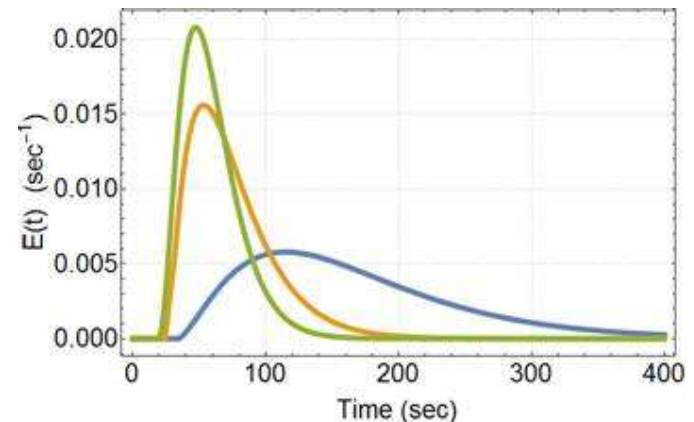
- Compendial specifications may not always provide adequate material control
- Understand impact of material attributes during development
- Develop procedures within the firm's pharmaceutical quality system (PQS) to monitor incoming material lots
- Perform model maintenance and update as necessary

# System Dynamics and Process Development



Residence Time Distribution (RTD): Probability distribution of time that solid or fluid materials stay inside one or more unit operations in a continuous flow system

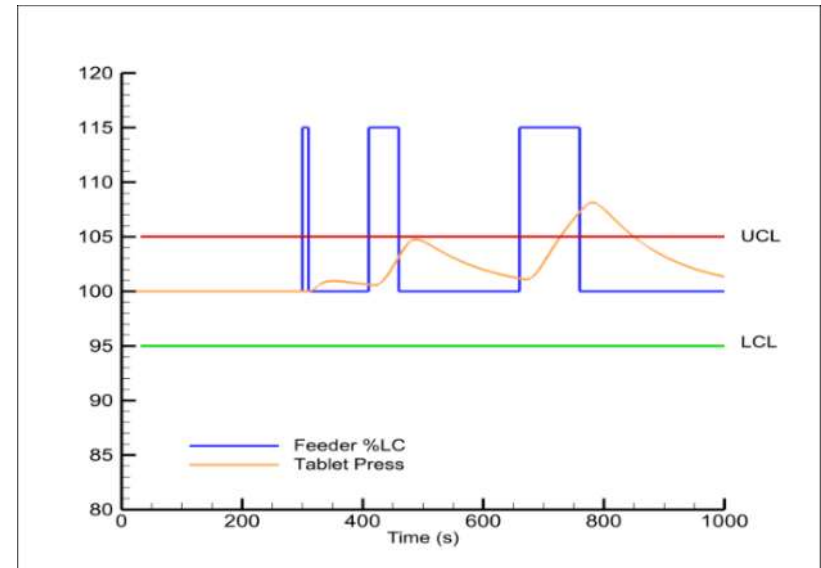
- RTD is a characterization tool of system dynamics and depends on:
  - Material properties
  - Process parameters
  - Equipment configuration



*Courtesy: Escotet-Espinoza, Rogers, Muzzio, Ierapetrirou,  
Engineering Research Center - Rutgers University*

# RTD Utilization in CM

- Evaluate equipment design and/or configuration
- Evaluate response to set point changes
- Assess filtering capacity of downstream equipment
- Track of material/disturbances throughout the line
- Support the sampling strategy during manufacturing
- Support accept/reject decisions, e.g. during start-up, shut down, pauses and restarts





# How is the Batch Size Defined in CM?

## 21 CFR 210.3

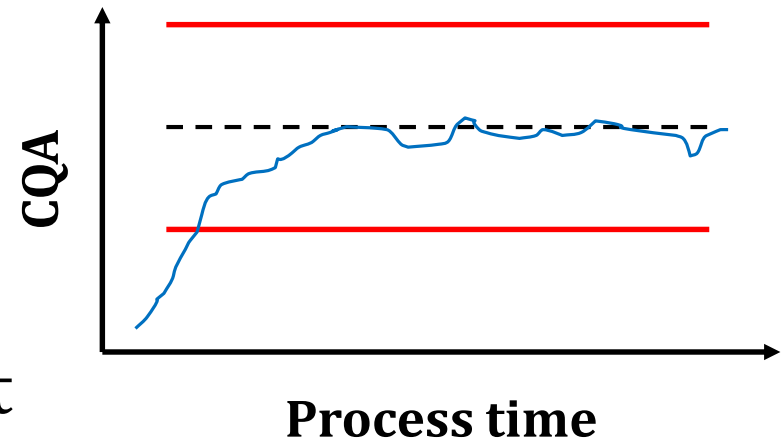
**Batch:** *A specific quantity of a drug or other material **that is intended to have uniform character and quality**, within specified limits and is produced **according to a single manufacturing order during the same cycle of manufacture**”.*

**Lot:** *A batch, or a specific identified portion of a batch, **that has uniform character and quality** within specified limits; or, in the case of a drug product produced by continuous process, it is a specific identified amount produced in a **unit of time or quantity** in a manner that assures its having **uniform character and quality within specified limits**.”*

- Batch size definition is flexible
- Can be defined as a function of run time, quantity of processed material, production variation
- Batch definition ensures proper documentation, conformance to batch release specifications, investigations of unexplained discrepancies, and in recall situations

# State of Control and Product Collection

- During start-up, and shutdown not all unit operations within a continuous production line will be in a state of control at the same time
- Description of start-up and shutdown procedures
- Clear criteria for product disposition
  - Starting and ending product collection
  - Material diversion



# Real Time Release Testing (RTRt)

The ability to evaluate and ensure quality of in-process and/or final product based on **process data**, typically include a valid combination of **measured material attributes and process controls** (ICH Q8 (R2))

## **Benefits:**

- Data rich environment
  - Enhanced process understanding
  - Increased assurance of quality
- Increased manufacturing flexibility and efficiency

# Design Considerations for In-Process Sampling

- Optimum points of testing/collecting model input parameters based on risk assessment
- Sampling strategy supported by system dynamics, e.g. sample acquisition time and sample frequency
- Valid sampling interface throughout the process, e.g. no fouling or instrument drift as a result of temperature or humidity variation
- Representative sample volume/mass

# Design Considerations for the PAT Method



- Appropriate model development, validation & update
  - Model impact on the overall control strategy
  - Procedures in the firm's quality system for monitoring model performance and updating the models
- Appropriate statistical criteria for large sample sizes
- Instrumental aspects
  - Routine maintenance
  - Instrument failure

# Facility Considerations



- Adjustments to existing facility pharmaceutical quality system (PQS)
  - Updates to Quality and production procedures
  - Quality oversight of automated controls, process data, RTR, and electronic records
- Quality evaluation when material is diverted and quarantined
  - Deviations, level of investigation, root cause analysis, corrective and preventive action, understanding diversion event for continuous improvement, etc.
- Process Validation, readiness for commercial manufacturing, and knowledge management
  - Demonstration of robustness, process monitoring, and broader control strategy
  - Assessment of change controls for total impact
- Integrated equipment train
  - Knowledge gained from equipment qualification to support proposed batch size or run time
  - Cleaning validation, maintenance, and performance monitoring to support commercial lifecycle and multiproduct manufacturing
- Additional controls for incoming raw materials

# Summary and Conclusions

- FDA supports implementation of continuous manufacturing using a science and risk-based approach
- Science and control strategy considerations for continuous manufacturing remain the same irrespective of submission type (new, drugs, generic drugs original applications, post-approval supplements)
- Process design, material and process understanding are key to a robust control strategy
- Role of PQS in a continuous manufacturing environment is critical to its long term success

## Challenge Question

- Compendial specifications of excipients provide adequate control of material attributes for continuous manufacturing (T/F)
- RTD as a characterization tool of mixing dynamics depends on:
  - a. Material properties
  - b. Process parameters
  - c. Equipment configuration
  - d. All of the above



