

# Continuous Manufacturing to Improve Pharmaceutical Quality: Research Examples and Opportunities

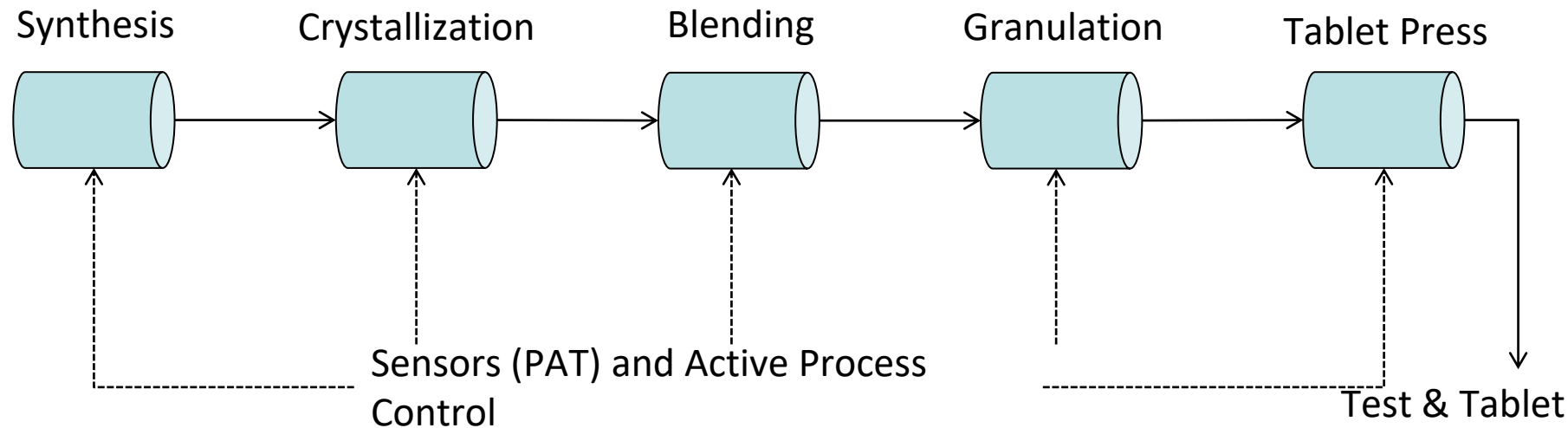
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Pharmaceutical Quality  
CDER | US FDA

Pharmaceutical Quality Symposium 2023– November 1<sup>st</sup>, 2023

- Continuous manufacturing (CM) of drug substances and drug products
- Process modeling and simulation (M&S) for CM at FDA
- CM research highlights
- Opportunities of CM for generic drug products

# CM of Drug Substance and Drug Product



## Benefits:

- Reduced environmental footprint
- Improved efficiency
- Enhanced product quality
- Faster time-to-market
- Cost savings

# Regulatory Considerations on CM

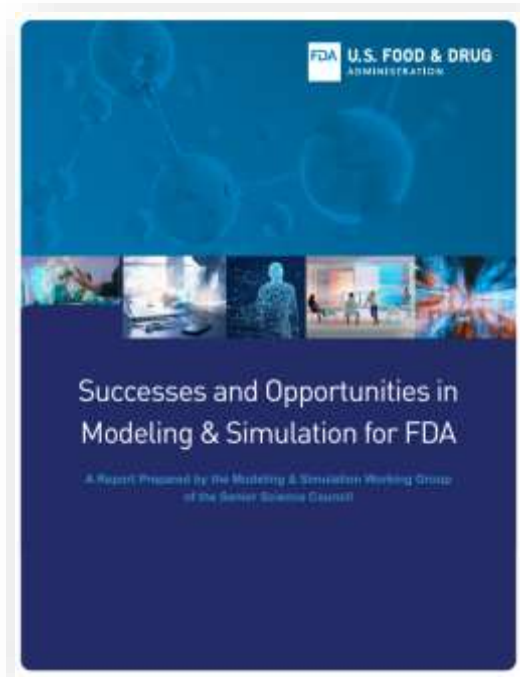
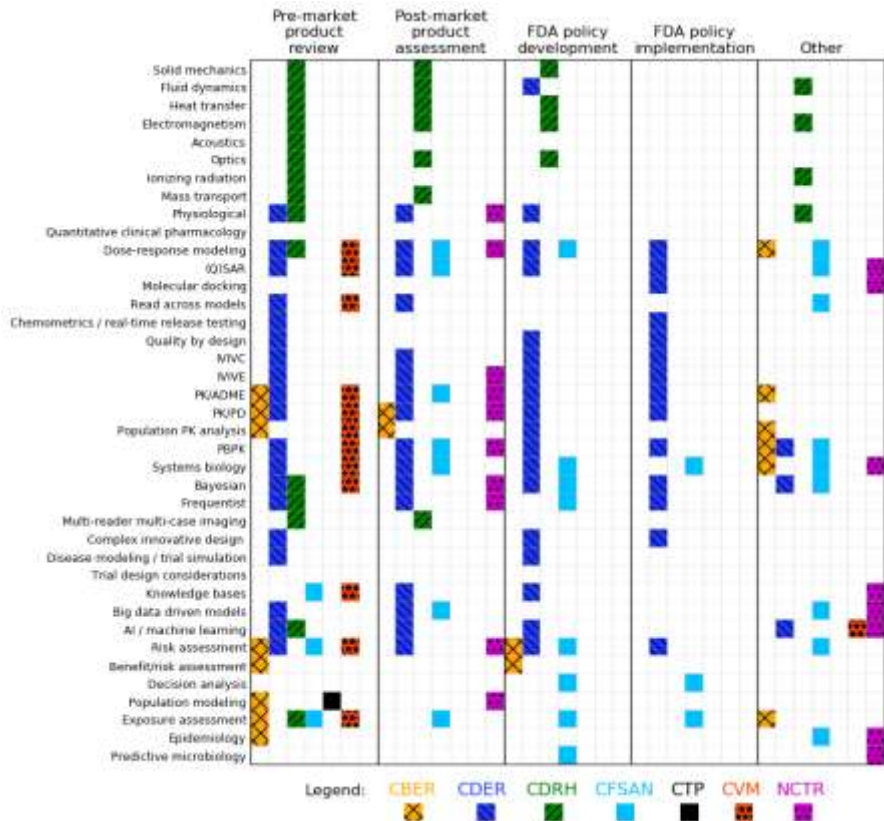
- **Characterization of process dynamics for critical steps and integrated system**
  - Residence time distribution for a proposed mass flow rate
  - Understanding of the system response to transient disturbances
- **Evaluation of the proposed attributes and specifications of raw materials**
  - Impact of variations in material properties on the performance of CM and product quality
- **Process monitoring and control strategy**
  - Monitor and detect transient disturbances and process deviation
  - Frequency of PAT measurements
  - Active process controls
- **Material collection and diversion**
  - Start up and shutdown
  - Strategy to identify, isolate and divert non-conforming materials
- **Real-time release testing**
  - PAT tools for assay and content uniformity
  - Dissolution models

## Q13 Continuous Manufacturing of Drug Substances and Drug Products Guidance for Industry

U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)  
Center for Biologics Evaluation and Research (CBER)

March 2023  
ICH

# Modeling and Simulation (M&S) at FDA



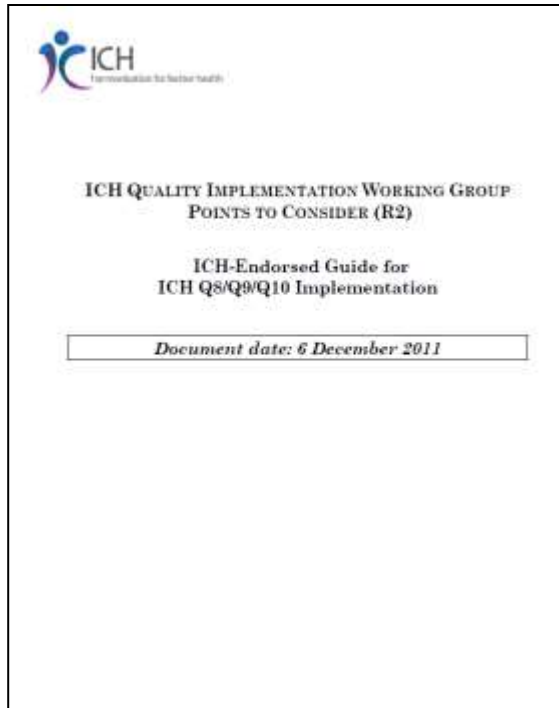
November 2022

- Development and assessment of process models by OPQ is not unprecedented but the frequency, types of models, and applications are evolving
- Advanced manufacturing a potential driving force for utilization of process modeling
  - Inherently data rich processes
  - Availability of plant wide information systems
  - Implementation of advanced control strategy approaches (MPC, RtR, etc.)
- Office of Pharmaceutical Quality (OPQ) has developed internal process M&S capabilities:
  - Continuous API synthesis and crystallization
  - Continuous drug product manufacturing
- FDA has established multiple external collaboration in the area of process M&S (e.g., RCPE, Siemens, Rutgers, Purdue, MIT)

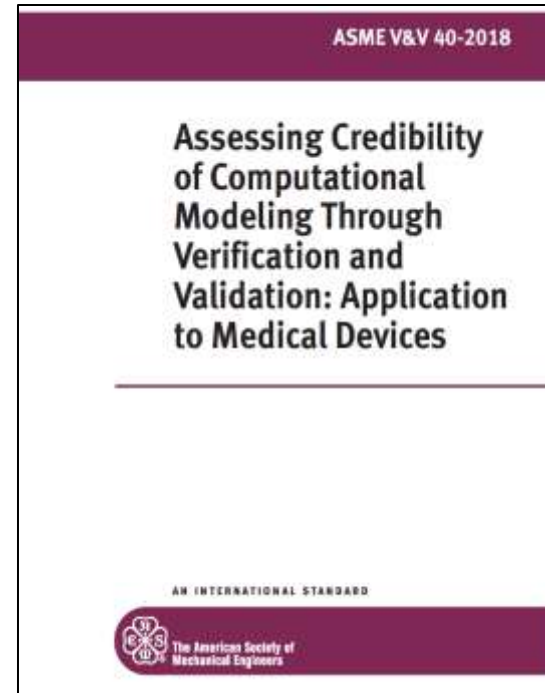
# Regulatory Guidances for Establishing and Assessing Model Credibility



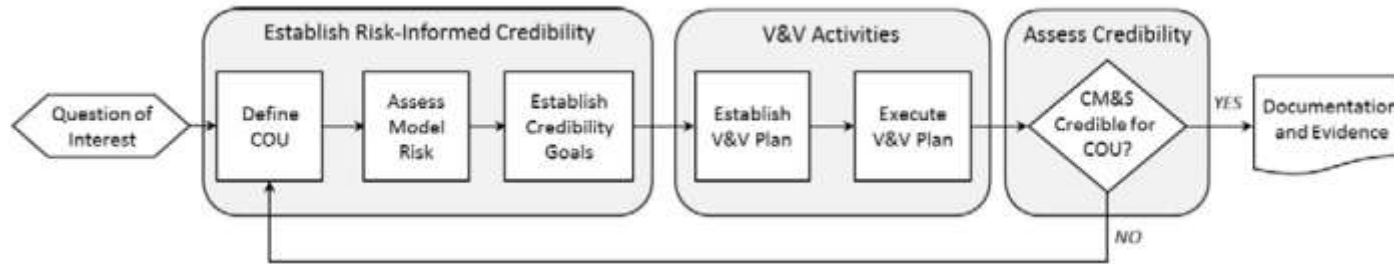
## ICH Points to Consider Document



## ASME V&V 40



# ASME V&V 40 Risk-Informed Credibility Assessment Framework



- The **question of interest** describes the specific question, decision or concern that is being addressed
- **Context of use (COU)** defines the specific role and scope of the model used to inform that decision
- **Model risk** is the possibility that the model may lead to a false/incorrect conclusion, resulting in adverse outcomes
- **Model credibility** refers to the trust in the predictive capability of the model for the COU



# Model Credibility Factors



**Model credibility** can be established through the collection of V&V evidence and by demonstrating the applicability of the V&V activities to support the use of the model for the COU.

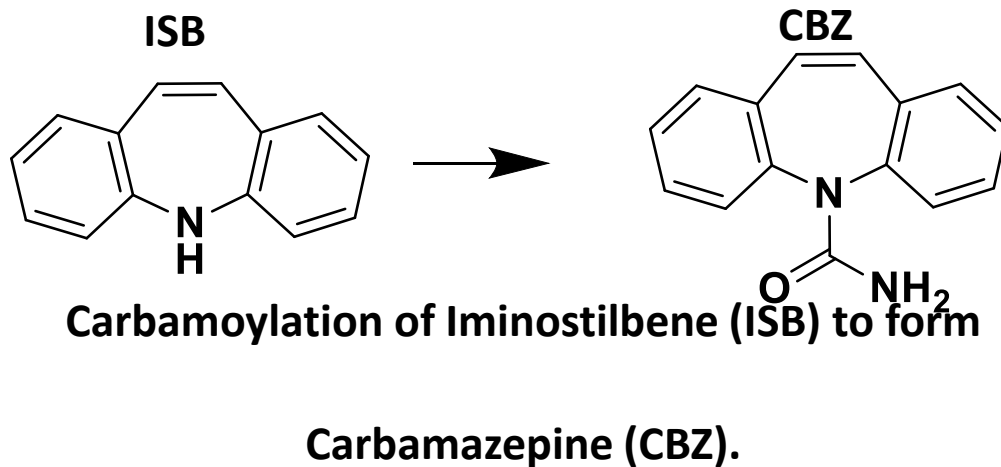
| Credibility Factors        |                 |           |   |            |                                     |                      |                   |                     |                     |                         |                              |                         |                                       |
|----------------------------|-----------------|-----------|---|------------|-------------------------------------|----------------------|-------------------|---------------------|---------------------|-------------------------|------------------------------|-------------------------|---------------------------------------|
| Verification               |                 |           |   | Validation |                                     |                      |                   |                     |                     |                         | Applicability                |                         |                                       |
| Code                       |                 | Solution  |   | Model      |                                     |                      | Comparator        |                     | Output Assessment   |                         |                              |                         |                                       |
| Software Quality Assurance | Numerical       | Algorithm | Verification Error                      | Use Error  | Numerical Solver Error              | System Configuration | System Properties | Boundary Conditions | Governing Equations | Sample Characterization | Control Over Test Conditions | Measurement Uncertainty | Equivalency of input and output types |
|                            | Rigor of Output |           | Relevance of the Quantities of Interest |            | Applicability to the Context of Use |                      |                   |                     |                     |                         |                              |                         |                                       |

| Level | Description  |
|-------|--|
| 1     | Visual comparison concludes good agreement.  |
| 2     | Comparison by measuring the difference between computational results and experimental data. Differences are less than 20%.   |
| 3     | Comparison by measuring the difference between computational results and experimental data. Differences are less than 10%.   |
| 4     | Comparison with uncertainty estimated and incorporated from the comparator or computational model. Differences between computational results and experimental data are less than 5%. Includes consideration of some uncertainty, but statistical distributions for uncertainty quantification are unknown. |
| 5     | Comparison with uncertainties estimated and incorporated from both the comparator and the computational model, including comparison error. Differences between computational results and experimental data are less than 5%. Statistical distributions for uncertainty quantifications are known.          |

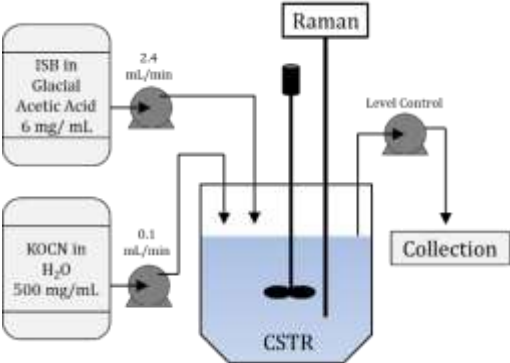
# Case Study I: CM of Carbamazepine (CBZ)



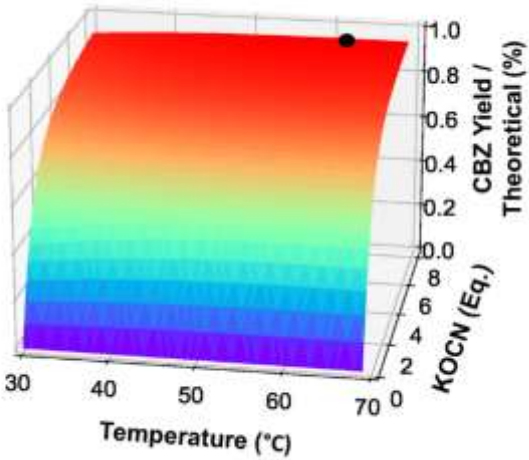
Developed an experimental platform and process models for continuous synthesis of CBZ with on-line PAT tools for advanced process monitoring and control



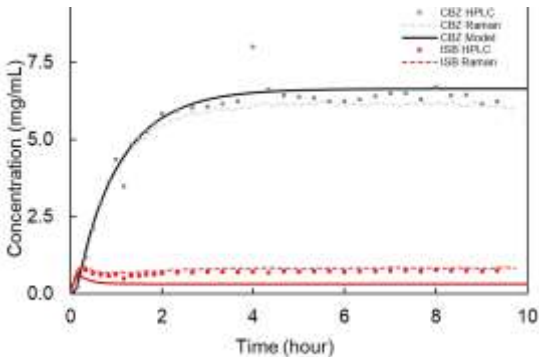
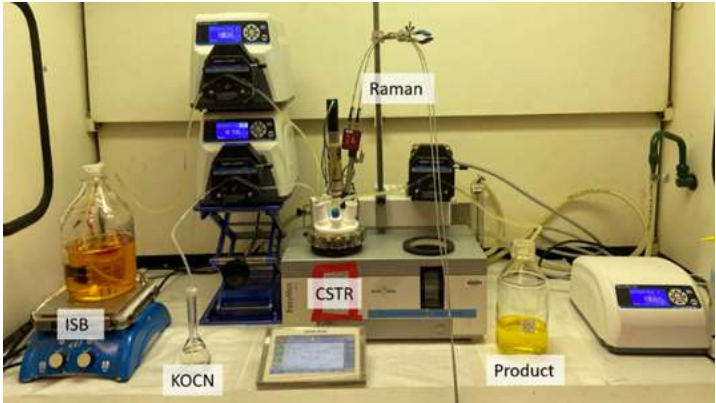
# Modelling the Continuous Synthesis Process for CBZ



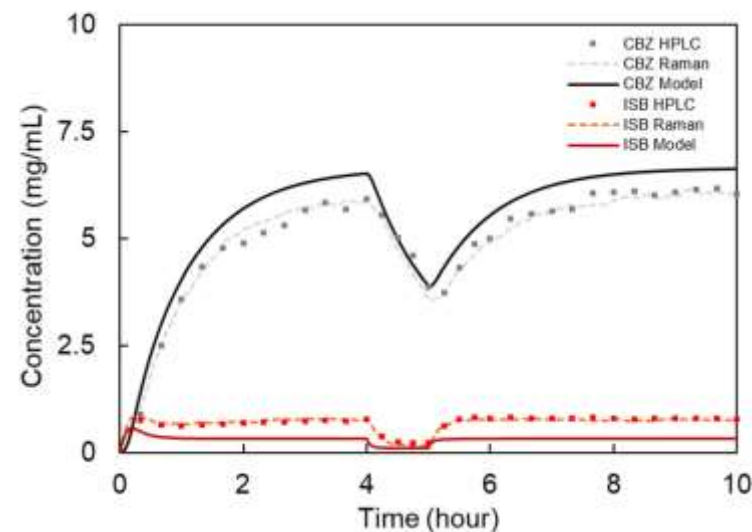
Global Kinetic Optimization for CSTR Process



Startup-Base Case Demonstration



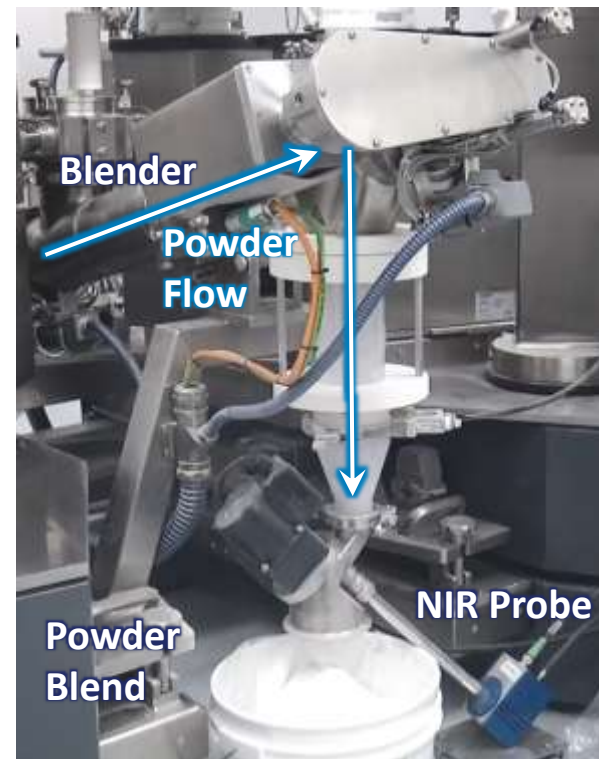
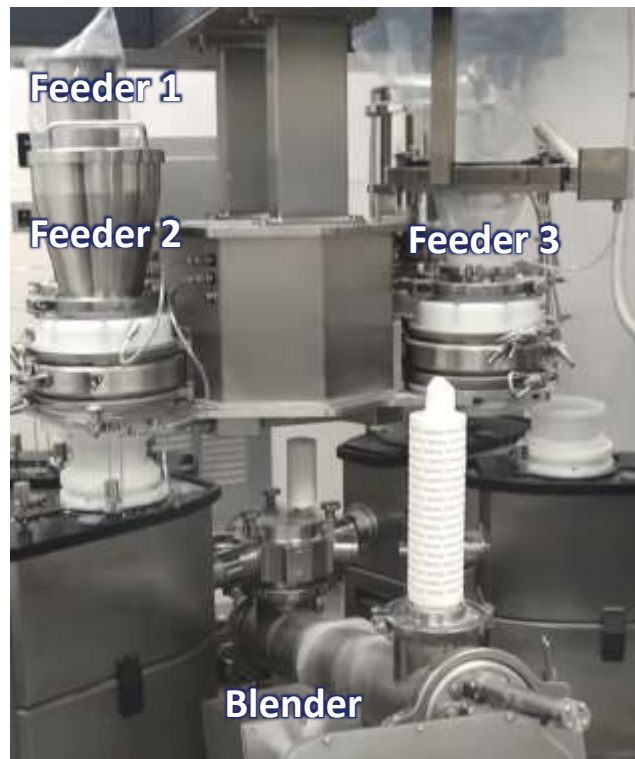
# Modeling Process Disturbances



**Stepwise disturbance in ISB stock:**  
 6 mg/ml to 2 mg/mL from hour 4 to hour 5

# Case Study II: Continuous Powder Blending

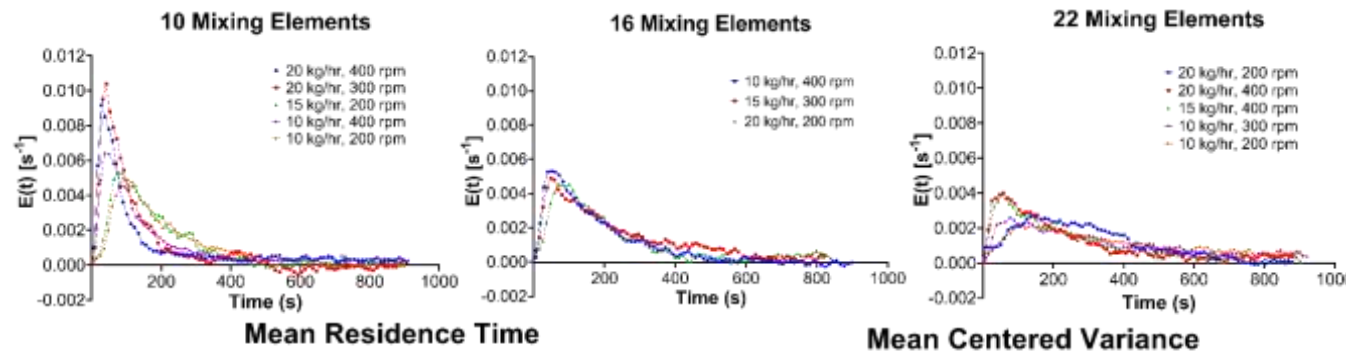
- Three loss-in-weight feeders feed API and excipients into a continuous blender
  - Blender contains configurable shaft with 28 elements
- Near infrared (NIR) spectrometer positioned below blender outlet
- The effects of material properties and process parameters on the residence time distribution (RTD) of API was investigated
- A discrete element method (DEM) blender model was developed and validated using experimental data



# Effect of Process Parameters on RTDs

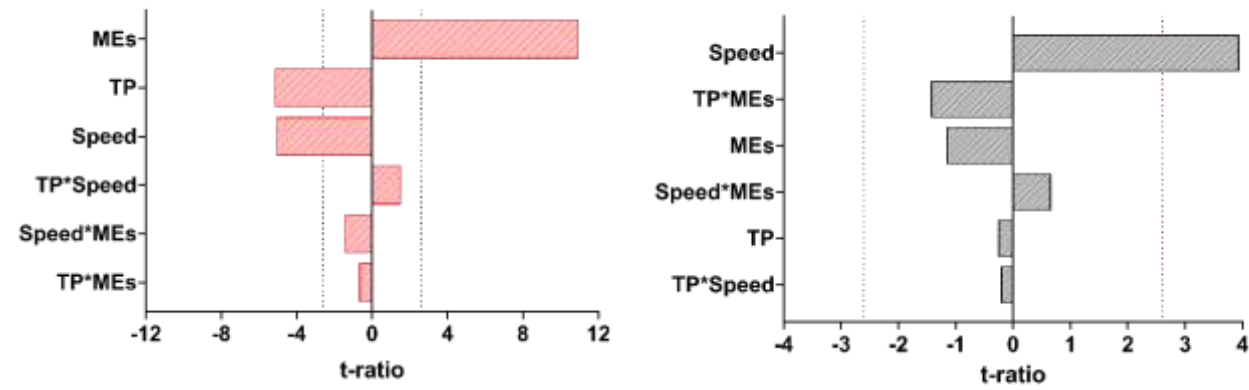
- Mean Residence Time:

- Increased with additional mixing elements (MEs)
- Decreased with increasing total throughput (TP) and blender speed (Speed)



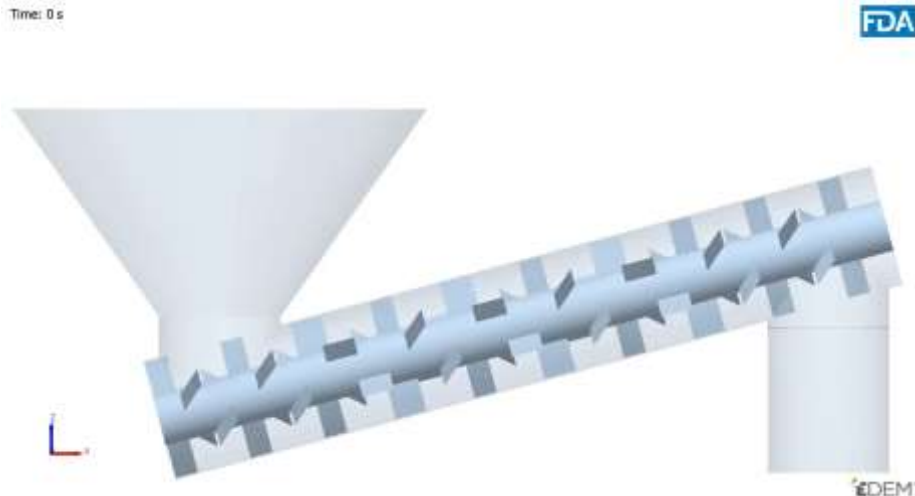
- Mean Centered Variance:

- Increased with increasing blender speed

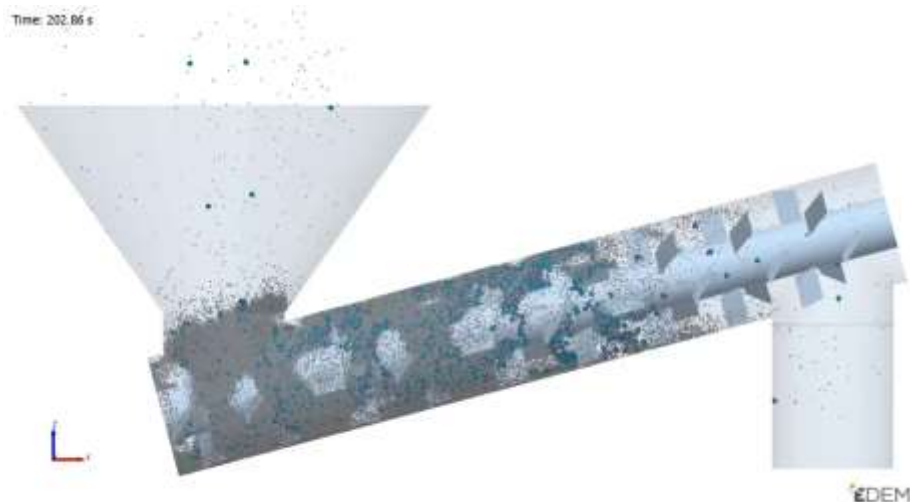


# Assessing RTDs in Continuous Powder Blending using DEM

Initial state



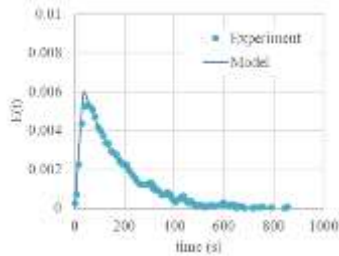
Steady state



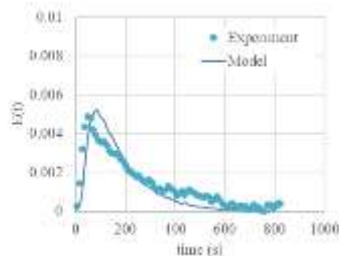
Videos are obtained from the simulation with 5%API, 15kg/hr, 300rpm, and 16M

# DEM Model Validation

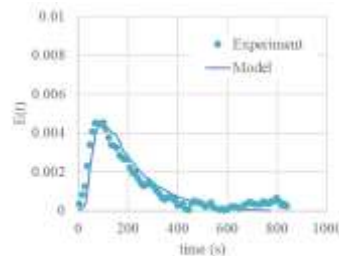
Case 5: 10kg/h, 400rpm, 16M



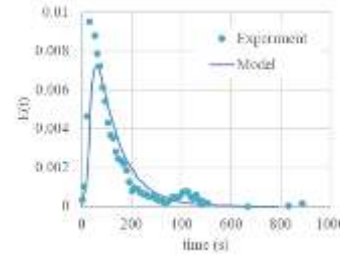
Case 6: 15kg/h, 300rpm, 16M



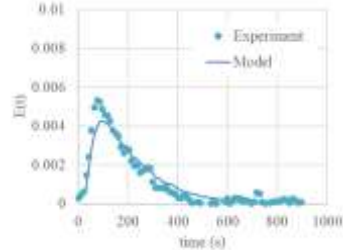
Case 7: 20kg/h, 200rpm, 16M



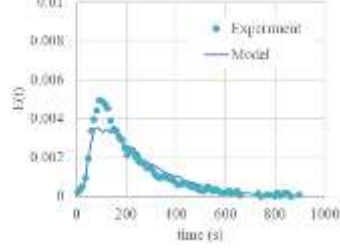
Case 9: 20kg/h, 300rpm, 10M



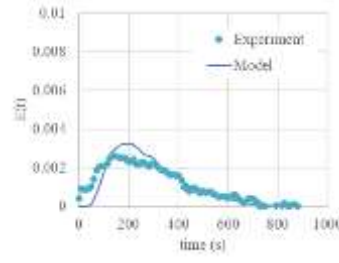
Case 10: 15kg/h, 200rpm, 10M



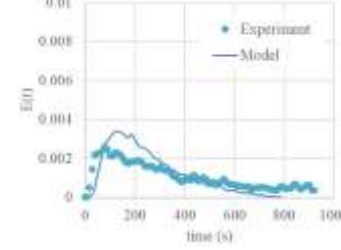
Case 12: 10kg/h, 200rpm, 10M



Case 13: 20kg/h, 200rpm, 22M



Case 16: 20kg/h, 400rpm, 22M



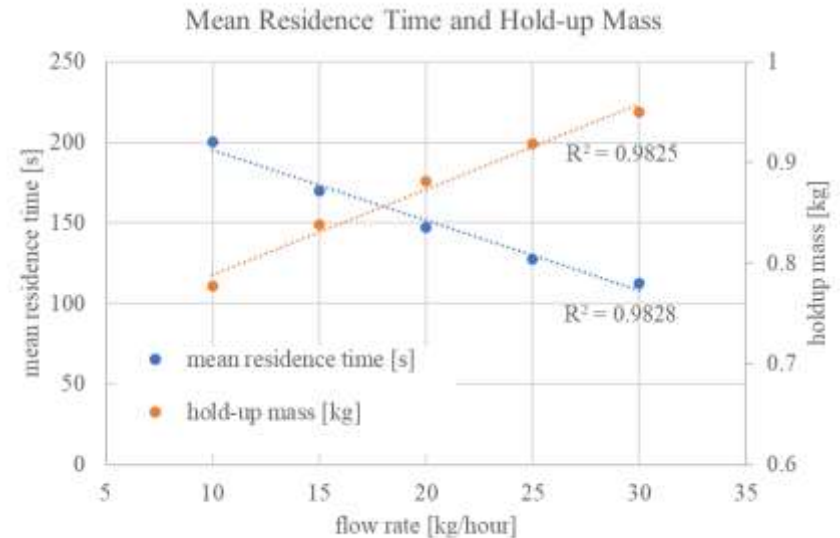
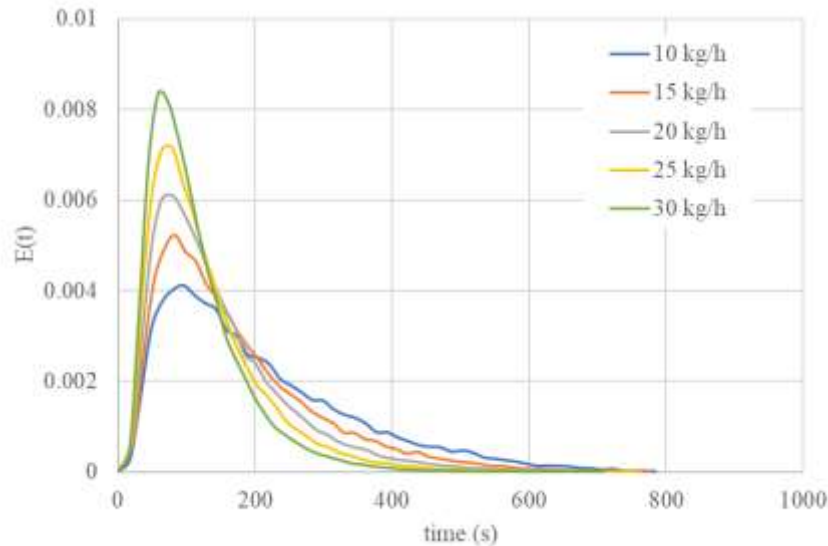
- Simulations agree well with experiments in most of cases



# Effect of Throughput



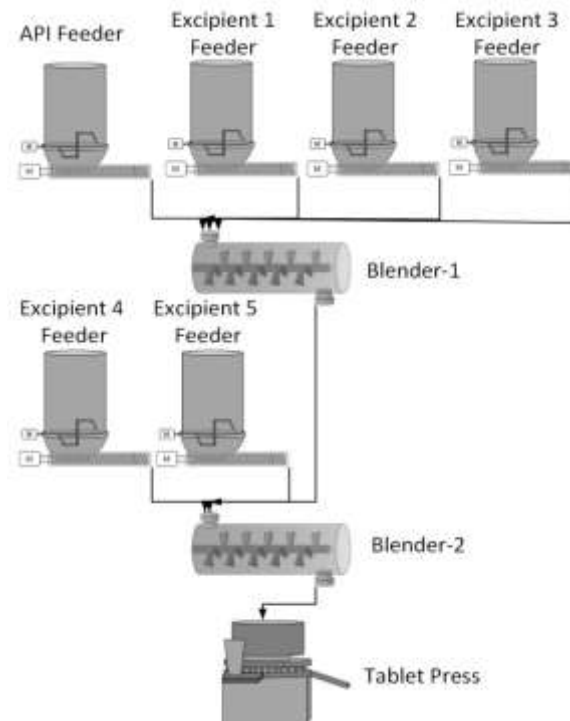
- Mean residence time decreases linearly with increasing throughput
- Hold-up mass increases linearly with increasing throughput



# Case Study III: Quality Risk Assessment of Continuous DP Process

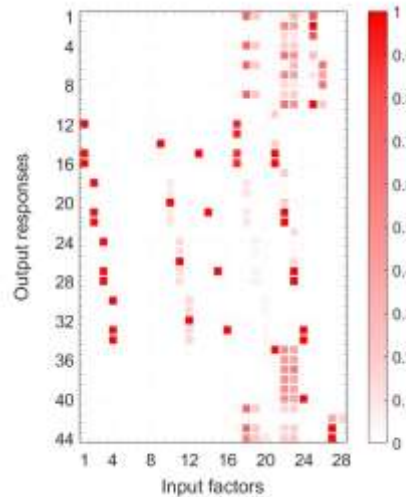


- Developed flowsheet process model for a continuous direct compression (CDC) line
  - Low dose formulation, excipient 1 and 2 compose over 90% of the formulation
- Performed sensitivity analysis in the risk assessment
- Identified potential process parameters and material attributes that affect critical quality attributes of the drug product

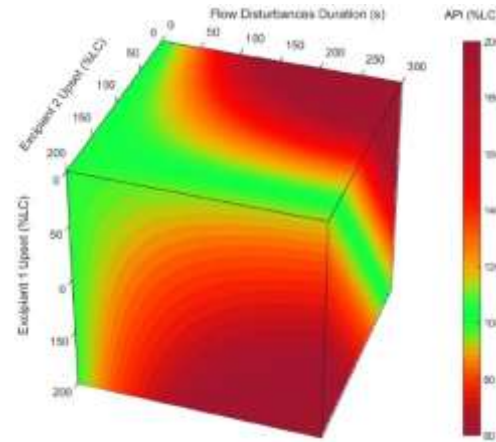


<https://doi.org/10.1016/j.compchemeng.2019.06.033>

# Sensitivity Analysis of CDC Process



Intensity plots representing steady-state sensitivity analyses that capture the effects of input factors on the output responses



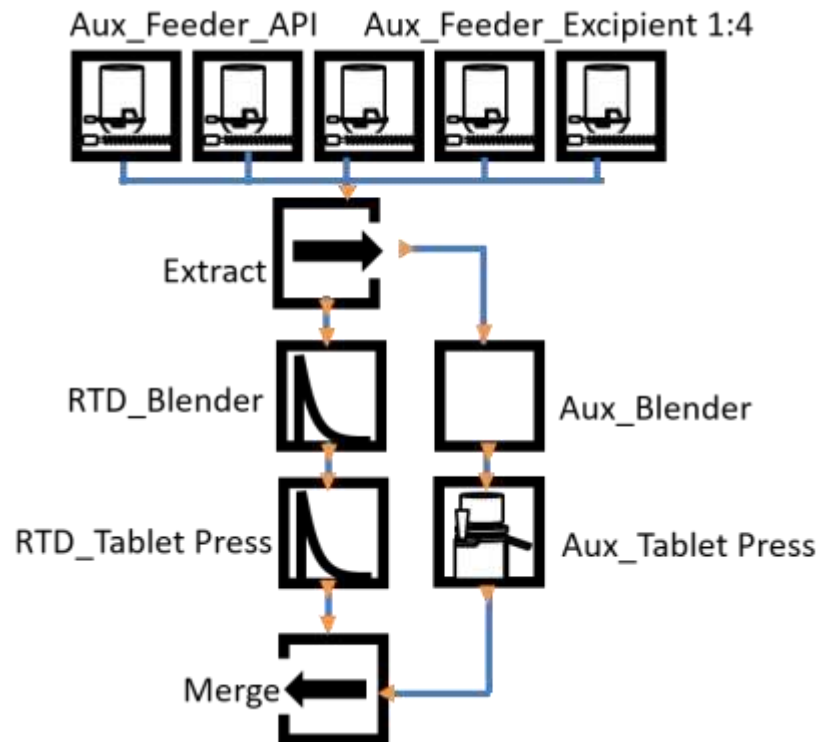
Impact of simultaneous disturbance in the flowrates of excipients 1 & 2 on final product concentration

API and excipients 1&2 density, and their flowrates are significant factors impacting drug product quality

# Case Study IV: Quality Risk Control of a Continuous DP Process

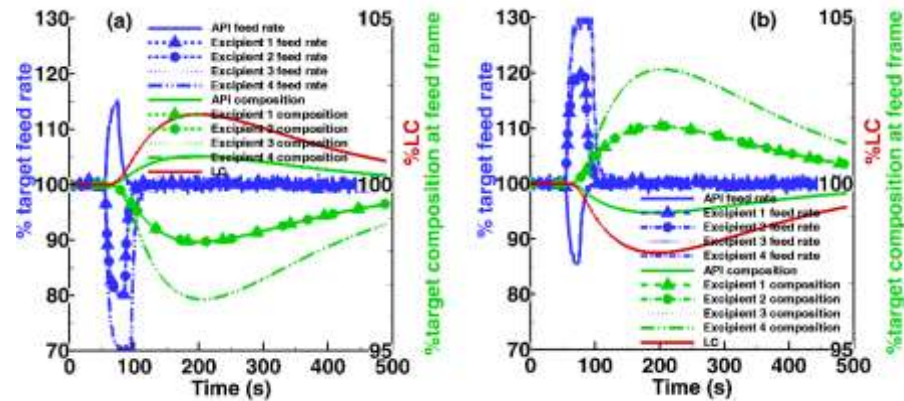


- Developed a RTD-based process modeling framework for a CDC line
  - Excipients 1 -4 compose over 65% of the formulation
- The effectiveness of in-process control (IPC) strategies were evaluated



# Establishing IPC Limits for API Loading

- Two worst-case scenarios are considered to evaluate proposed IPC limits
  - API feeder operates at its upper (Fig. a)/lower limit (Fig. b) and excipients feeders operate at their lower (Fig. a)/upper limits (Fig. b)



- The feeder IPC limits are set conservatively as the corresponding peak concentrations at the feed frame are within the feed frame IPC limits

| Component      | Feeder IPC Limits   | Feed Frame IPC Limits |
|----------------|---------------------|-----------------------|
| API            | ±15% for 20 seconds | ±5%                   |
| Excipient 1, 2 | ±20% for 30 seconds | ±5%                   |
| Excipient 3, 4 | ±30% for 40 seconds | ±10%                  |

# Opportunities of CM for Generic Drug Products



- 90% of medicines used by U.S. patients are generic, but no generic medicines have been approved to use CM
- One of the potential drivers motivating generic companies to be involved in implementing CM includes complex drug products such implants, long-acting microspheres, and liposomes
- CM applicants had shorter times to approval and marketing compared to batch applicants
  - 3 months faster to approval (median)
  - 4 months faster to marketing
  - ~\$171-537M in early revenue benefit
- No substantial regulatory barriers for CM related to:
  - Manufacturing process changes
  - Pre-approval inspections

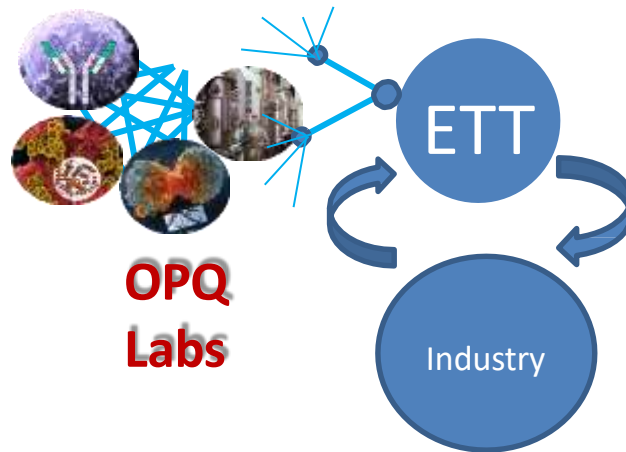


<https://doi.org/10.1016/j.ijpharm.2022.121778>

# Concluding Thoughts



- Regulatory experience for advanced manufacturing is evolving
- Research Case Studies Support Regulatory Decision Making
  - OPQ Science and Research
    - Knowledge gained from the internal and sponsored research inform policy, review, and inspection activities, ensuring that FDA regulatory policies reflect state-of-the-art manufacturing science.
- Shared learning and open communication to accelerate adoption of emerging technologies to advance product quality



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