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### **Another Reminder**

Rose is a rose is a rose is a rose.



Gertrude Stein (1913)

Guidelines are guidelines are guidelines.



Henrike Potthast (ca. 2004)

No one wants to learn from mistakes, but we cannot learn enough from successes to go beyond the state of the art. *Henry Petroski* 





### EMA's confusing Terminology

# C<sub>min,ss</sub> "By C<sub>min,ss</sub> we mean the concentration at the end of the dosing interval, i.e. C<sub>trough</sub>." (2010 BE GL Commentary p89)

■C<sub>min,ss</sub>

Minimum concentration at steady state.

C<sub>τ</sub>

Concentration at the end of the dosing interval.

C<sub>τ,ss</sub>
 Concentration at the end of τ at steady state.





### EMA's confusing Terminology

#### Clarifications and interpretations

- Single dose metrics
  - $C_{\tau}$  Concentration at the end of the [intended] dosing interval. Not necessarily  $C_{last}!$
- Multiple dose metrics
  - Concentration at the end of the dosing interval. PK metric if reference is MR.
  - C<sub>min,ss</sub> [Global] minimum concentration at steady state. PK metric if reference is IR.
- **Cave:** Only  $C_{min,ss}$  implemented in PK software (minimum concentration within  $\tau$ ) requires adaption!



Modified Release:  $C_{min} - C_{\tau}$ 









Modified Release:  $C_{min} - C_{\tau}$ 













#### •EMEA MR (1999)

- MR developed after an IR formulation
  - It should be demonstrated that the MR formulation [...] produces similar or less fluctuations as the IR product and comparable total systemic exposure that is acceptable in comparison to that of the IR product.
  - The pharmacokinetic parameters of interest are AUC, C<sub>max</sub> and C<sub>min</sub> or other means reflecting fluctuation.

BE of prolonged release formulations

BE of AUC<sub>τ</sub>, C<sub>max</sub> and C<sub>min</sub> applying similar statistical procedures as for the IR formulations.





#### •EMA MR Draft XXIII (March 2013)

- MR developed after an IR formulation
  - [...] by comparison with an IR formulation following single dosing and generally also repeated dosing.
  - The pharmacokinetic parameters of interest may be for single dose studies  $AUC_{0-t}$ ,  $AUC_{0-\infty}$ , residual area,  $C_{max}$ ,  $t_{max}$  and  $t_{lag}$  and for multiple dose studies  $AUC_{0-\tau}$ ,  $t_{max,ss}$ ,  $C_{max,ss}$ ,  $C_{min,ss}$  and fluctuation.
  - Fluctuation in drug concentrations should be studied following repeated dosing. Unless otherwise justified, the MR product should produce similar or less fluctuations as the IR product.





#### EMA MR Draft XXIII (March 2013)

- In principle therapeutic studies are necessary. However, therapeutic studies might be waived when:
  - BE between the IR and the MR product is shown in terms of C<sub>max</sub>, C<sub>min</sub> and AUC at steady state because the MR product is developed to actually mimic the performance of an IR product and its dosage regimen e.g. a pulsatile multiphasic release dosage form containing pellets with different lag time[s].





#### **Pulsatile multiphasic**







#### EMA MR Draft XXIII (March 2013)

- In principle therapeutic studies are necessary. However, therapeutic studies might be waived when:
  - BE bioequivalence between the IR and the MR product is shown in terms of C<sub>max</sub>, C<sub>min</sub> and AUC at steady state despite differences in the shape of the plasma concentrationtime profile if it is possible to justify that the difference in shape has no relevance for efficacy and safety based on the exposure – response and profile shape-response relationships.





#### EMA MR Draft XXIII (March 2013)

- In principle therapeutic studies are necessary. However, therapeutic studies might be waived when:
  - There is a well-defined therapeutic window in terms of safety and efficacy, the rate of input is known not to influence the safety and efficacy profile or the risk for tolerance development and strict bioequivalence between the IR and the MR product is shown in terms of AUC at steady state and C<sub>max,ss</sub> for the MR formulation is below the C<sub>max,ss</sub> for the IR formulation and C<sub>min,ss</sub> for the MR formulation is above the C<sub>min,ss</sub> for the IR formulation.













### **Case Study**

#### •MR theophylline 400 mg o.a.d. fasting (n=24)





### **Case Study**

#### •MR theophylline 400 mg o.a.d. fasting (n=24)

- Extremely high variability of C<sub>τ,ss</sub>
- Discussion in Bonn (June 2013) whether the pre-dose conc. and C<sub>τ,ss</sub> can be used for reference-scaling. Since

PK metric	90% CI		CV%
AUC <sub>τ</sub>	96.6%	108.3%	11.6
C <sub>max,ss</sub>	107.9%	123.9	14.0
$C_{\tau,ss}$	56.2%	92.6%	53.7
$MRT_{\tau}$	93.2%	97.0%	4.0
%PTF	116.9%	132.8%	12.9
Swing	136.4%	228.9%	56.0

we are in steady state, that's a replicated value. No objections from members of the PK working party.

Does that really work? Sequences RRTT | TTRR...





### **Problems in NCA**

C<sub>τ</sub> and C<sub>τ,ss</sub>
Missing samples or sampes with time deviations may lead to 'Apples-and-Oranges' statistics
If a reliable estimate of λ<sub>z</sub> is possible (≥3 data points), we can use the estimate (1) ± shift of C<sub>τ</sub> based on λ<sub>z</sub>\*

$$\hat{C}_{\tau} = C_{last} e^{-\hat{\lambda}_z(\tau - t_{last})}$$

(2) Estimation independent from measured C<sub>last</sub>

$$\hat{C}_{ au}=e^{\hat{C}_{0}-\hat{\lambda}_{z}\cdot(t_{0}+ au)}$$

#### \* Gabrielsson J and D Weiner

*Pharmacokinetic & Pharmacodynamic Data Analysis: Concepts and Applications* Swedish Pharmaceutical Press, Stockholm, p163 (4<sup>th</sup> ed. 2006)





### **Problems in NCA**

#### $^{\circ}C_{\tau}$ and $C_{\tau,ss}$

#### Must unambiguously be described in the protocol.

Partial AUCs will be calculated from t=0 to t=4 h and from t=4 h to  $t=\tau$ . If sampling times deviate from these nominal times or samples are missing, the linear-up / logarithmic-down trapezoidal rule accounts for these deviations (*i.e.*, interpolated values are used). Since only in the second profile the last sample is drawn exactly at  $\tau$  (in the first profile five minutes prior to the administration), the concentration estimated at  $t = \tau \hat{C}_{\tau}$  (instead of the last measured concentration  $C_{last}$ ) will be used in order to obtain an unbiased comparison between treatments. The estimation is based on fitting terminal concentration values (at least three) to a monoexponential model by means of unweighted semilogarithmic regression and subsequently calculating  $\hat{C}_{\tau} = C_{t_{obs}} e^{-\hat{\lambda}_{z}(\tau - t_{obs})}$ . The method accounts also for delayed sampling or cases where the concentration at  $\tau$  is below the LLOQ. Note that if a sample is drawn at the scheduled time point, no corrective estimation is done, since  $\tau - t_{obs} = 0$  and  $e^0 = 1$ ; therefore  $\hat{C}_{\tau} = C_{t_{obs}}$ .





### **Case Study**

#### •MR (IR+PR) methylphenidate 60 mg o.a.d. fed







### **Case Study**







# **Waiving MD Studies**

- Can we make a prediction about similarity of formulations in steady state from SD data (*i.e.*, waiving the MD study)?
  - Concentration at the intended dosage interval C<sub>τ</sub> in discussion (EUFEPS Barcelona 2011)
  - C<sub>τ</sub> is dependend on all formulation-specific PK parameters (F, k<sub>a</sub>, t<sub>lag</sub>)
  - Exhaustive simulations by Paixão et al. (2012)
    - Monophasic elimination, linear PK
    - Various input types (first order, mixed with zeroorder, biphasic input; all models with/without lag-time = six szenarios)





# **Waiving MD Studies**

#### Paixão et al. (2012)

- Parameters chosen to give accumulation  $(AUC_{0-\tau} < 80\% AUC_{0-\infty})$
- Each scenario simulated with different CVs
- Sample sizes 12–48
- Results
  - C<sub>τ</sub> is indeed predictive of MD performance
  - Requires higher sample sizes of the SD study in order to maintain power (CV 30–40% as compared to 20–30% of other PK metrics)





# **Waiving MD Studies**

#### EMA MR Draft XXIII (March 2013)

- The discussion of the opportunity of using equivalence in C<sub>τ</sub> in single dose studies as basis for waiving the multiple dose study has been recognized. However, there is not considered to be sufficient scientific evidence at the moment to encourage this approach.
  - García-Arieta et al. (2012)
    - Six case studies; five failing in MD failed on C<sub>τ</sub> in SD as well. The remaining one is inconclusive. All SD studies underpowered.
    - Number of passing studies not reported (relevance?)







#### Thank You! Modified Release $C_{min} - C_{\tau}$ Open Questions?



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#### References

#### •EMA-CPMP/CHMP/EWP

- Note for Guidance on Modified Release oral and Transdermal Dosage Forms: Section II Pharmacokinetic and Clinical Evaluation (1999)
- Guideline on the Investigation of BE (2010)
- Questions & Answers: Positions on specific questions addressed to the EWP therapeutic subgroup on Pharmacokinetics (2013)
- Draft Guideline on the Pharmacokinetic and Clinical Evaluation of Modified Release Dosage Forms (2013)

#### Paixão et al.

An alternative single dose parameter to avoid the need for steady-state studies on oral extended-release drug products Eur J Pharmaceut Biopharmaceut 80(2), 410–7 (2012) DOI: 10.1016/j.ejpb.2011.11.001

 García-Arieta et al. Investigation on the need of multiple dose bioequivalence studies for prolonged-release generic products Int J Pharmaceut 423(2), 321–5 (2012) DOI: 10.1016/j.jipharm.2011.11.022

