



09 September 2011

Medicines Quality Assurance Programme
Quality Assurance and Safety: Medicines
World Health Organization
1211 Geneva 27
Switzerland

ISPE appreciates the opportunity to provide comments on the above referenced draft document. While ISPE members have no major objections to the proposed wording, they have expressed the concern that any change to the current definition will mean that it will no longer be the same as the definition in ICH Q7, one which is used by many other regions and organisations such as PIC/S. Before any changes are made, we recommend a comprehensive discussion with all stakeholders, especially ICH. The goal should be one definition which is globally acceptable.

Please let me know if you have any questions.

Yours Sincerely,

Robert P. Best
President/CEO
ISPE

Comments on WHO Working Document QAS/11.426/Rev.1



Title of the document: Definition of Active Pharmaceutical Ingredient

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Template for comments

Kindly complete the table without modifying the format of the document - thank you.

General comment(s) if any :	Originator of the comments
<p>While ISPE members have no major objections to the proposed wording, they have expressed the concern that any change to the current definition will mean that it will no longer be the same as the definition in ICH Q7, one which is used by many other regions and organisations such as PIC/S. Before any changes are made, we recommend a comprehensive discussion with all stakeholders, especially ICH. The goal should be one definition which is globally acceptable.</p>	

# section	# Paragraph If more than one	Comment / Rationale	Proposed change / suggested text	Classification L= low M= medium H= high	Originator of the comments (for WHO use)
		The definition of substance should be clearly defined to show the meaning. For example : Is it a chemical compound? How do you address optical isomers that are similar but not identical?		L	
		Mixtures of <i>APIs</i> are not API's.		L	
		We agree with the proposal, but would note that the only real difference it makes is in which section you include an API blending step in the dossier. The only correction to the document is on the first line of the proposal section where it is “a combination of substances” that is being replaced and not “a mixture”	It is proposed that the above definition be changed by deleting “or mixture combination of substances ”	L	
		We agree with the definition as written, but wonder if the existence of exceptions should be part of definition also; otherwise the possibility of the exceptions could be lost.		L	

# section	# Paragra ph If more than one	Comment / Rationale	Proposed change / suggested text	Classific ation L= low M= medium H= high	Origina tor of the comme nts (for WHO use)
		Besides exceptions discussed in paper, there are several API's derived from extraction of natural products that are mixtures of over 100 substances, many which are not identified.			
		<i>Please add rows as necessary (with "copy and paste" empty rows)</i>			