CHPA CONSUMER HEALTHCARE PRODUCTS ASSOCIATION
founded 1881

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General Chapters Dosage Form Committee
U.S. Pharmacopeia
12601 Twinbrook Parkway
Rockville, MD 20852-1790

PF 40(4) General Chapters for <909> Uniformity of Dose from Oral Suspensions in Multi-Unit Containers

Dear Mr. Brown:

On behalf of the Consumer Healthcare Products Association (CHPA), a 133 year-old trade association representing the nation's leading over-the-counter (OTC) medicine and nutritional supplement manufacturers, I'd like to thank you for the opportunity to comment on U.S. Pharmacopeia's draft publication: General Chapter <909> Uniformity of Dose from Oral Suspensions in Multi-Unit Containers published in Pharmacopeial Forum PF 40(4).

CHPA is generally supportive of the proposal for developing standards for uniformity of dose for oral suspensions as outlined in General Chapter <909 > Uniformity of Dose from Oral Suspensions in Multi-Unit Containers. CHPA has concerns about the applicability of the general chapter to a wide range of oral suspensions. Many OTC oral suspensions such as children's cough/cold medications and gastrointestinal products are available in containers that do not contain the ten doses required to perform the testing as outlined. In fact many products may be marketed as having as few as 4 doses per container and could not be tested as outlined in the proposed chapter.

I have provided examples of currently marketed OTC products below:

One product is available in a ½ ounce bottle (15 mLs) where each dose can be 1.875 mL which equates to 8 doses. The same product is also available in a ¼ ounce bottle (7.5 mL) and using the same dosing equates to approximately 4 doses. Another product contains 1 ounce in a bottle (29.5 mLs) and each dose is 5 mLs which equates to approximately 6 doses.

This is a common product marketing practice particularly for OTC pediatric products where variable dosing is based on age. CHPA recommends that the USP include language in the proposed General Chapter which allows the required 10 doses to be taken from multiple containers. Representative samples would be taken from the top, middle, and bottom of each container.

Another situation exists where a container contains 100 doses of oral suspension. Using 10 doses to test for uniformity of dose would not represent the entire container nor would it simulate normal usage. This scenario is not described in the proposed chapter.

CHPA agrees with the general approach and limits outlined in the acceptance criteria section but notes that the acceptance criteria should include an assay range, standard deviation and details for Stage 2 testing approach.

Based upon the range of oral suspensions currently marketed, CHPA recommends that the USP consider taking an alternate approach to developing a General Chapter for Uniformity of Dose from Oral Suspensions and include the general requirements for uniformity of dose testing in General Chapter <2> Oral Drug Products – Product Quality Tests. The USP can then support the general requirements through the monograph modernization efforts to include product monograph specific test procedures and acceptance criteria for uniformity of dose for oral suspensions.

Alternatively, General Chapter <905> Uniformity of Dosage Units in combination with <698> Deliverable Volume could provide another means to evaluate the product for these attributes. If uniformity/homogeneity is demonstrated within each container and then it is ensured that each container can deliver the stated volume then the consumer can be assured that the product is uniform for each dose. General Chapter <905> currently applies to oral suspensions in multi-dose containers and the use of the two already existing general chapters suffices to accurately demonstrate Uniformity of Dose from Oral Suspensions. In fact this combination is what is currently used for oral liquid USP suspension product monographs (for example -acetaminophen, ibuprofen, amoxicillin, ampicillin, and naproxen).

In summary, CHPA strongly supports improving USP test methods to establish specifications for drug substances and drug products. Modern test methods can provide an additional measure of safety for OTC products. CHPA is generally supportive of the proposal for developing standards for uniformity of dose for oral suspensions as outlined in General Chapter <909 > Uniformity of Dose from Oral Suspensions in Multi-Unit Containersbut has concerns about the applicability of the general chapter to a wide range of oral suspensions and offers alternatives to General Chapter <909>.

CHPA appreciates the opportunity to comment on the proposed general chapter approach to OTC monograph modernization. I am happy to speak to you about this issue at greater length and detail. Feel free to contact me directly at your convenience.

Best Regards,

John S. Punzi, Ph.D
Director Quality Assurance and Technical Affairs