

Risk Assessment Tool for Excipients (RATE)

Founded in 2004, McGee Pharma International is a life science consultancy working with global pharmaceutical, biopharma, and medical device companies of all sizes. With a team comprising a number of former EU and US FDA Regulatory Inspectors, we work at a strategic and tactical level with our clients, providing holistic advice, guidance and solutions across the entire product lifecycle.

With a global network of over 90 GxP consultants, we have the bandwidth to support the diverse demands facing our clients. We offer immediately accessible support and training to build knowledge and in-house capability, providing them with the tools to make informed decisions and improve operational efficiency.

Since March 2016, the manufacturing authorisation holder (MAH) is required to perform a risk assessment of excipients to ensure that they are suitable for use in medicinal products for human use. McGee Pharma International (MPI) has developed a management tool to facilitate the conducting of these risk assessments in a formalised manner which could be incorporated into a client's quality management system. The software application is called "Risk Assessment Tool for Excipients" (RATE).

A risk assessment as set out in the '*Guideline on the formalized risk assessment for ascertaining the appropriate good manufacturing practice for excipients of medicinal products for human use (2015/C 95/02)*' published by the European Commission on 19th March 2015 should be carried out by the MAH to determine the appropriate GMP for excipients of medicinal products for human use.

Have you completed a documented risk assessment of all excipients for all your authorised medicinal products for human use?

The Guideline states the following in the introduction:

- The risk assessment to ascertain appropriate GMP for excipients shall be **formalised**.
- The excipient risk assessment procedure should be incorporated into the pharmaceutical quality management system of the MAH
- The excipient risk assessment documentation should be available on site for review by GMP inspectors
- For excipients for authorised medicinal products for human use, the risk assessment as set out in the Guideline should be carried out by 21st March 2016

The risk assessment process should ensure that all elements of the Guidance are achieved – holistic risk based management of the excipient manufacturer **on the basis of your products**.

The process is wider than just the excipient risk profile. It must achieve the end goal of determining

- the risk profile per excipient
- the risk profile per manufacturer
- the control strategy for managing and accessing this on an ongoing basis

A number of steps needs to be taken to achieve this:

1. Classification of excipient's risk profile – Low/Medium/High risk
2. Determination of appropriate GMP controls based on type and use of excipient
3. Classification of manufacturer's risk profile – Low/Medium/High risk
4. Determine risk control strategy based on the outcome of the risk review

Further factors need to be taken into consideration during the process:

- Risk from excipient source and process, such as source of the excipient (animal, mineral, vegetable, synthetic), viral contamination, supply chain complexity, supplier history, packaging integrity, storage and transportation conditions.
- Excipient use and function, such as pharmaceutical form and use of the medicinal product, function of the excipient in the formulation, daily patient intake of the excipient.

RATE

Risk Assessment Tool for Excipients (RATE) has been designed and validated by MPI. RATE is a tool designed to provide a platform to enable the recording of the risk assessments performed for excipients, in order to comply with the EU Guideline.

The tool offers a mechanism for reviewing risks and scoring these in order to determine the overall risk level associated with the excipient and the manufacturer and the GMP control requirement.

Do you use multiple manufacturers of an excipient? Do you use excipients in different formulations? What if the excipient has different functions and volumes in the different formulations? RATE will help you to determine what approach should be taken where.

The RATE software will provide a structure to performing the following elements of the assessment process:

- **Assessment of each of the excipients**, from each manufacturer in each formulation, to ascertain the worst case use of each material on site against the criteria outlined in the guideline. This will create the Excipient Risk Profile.
- Assessment of each materials individual Excipient Risk Profile to **determine the appropriate GMP** that should be applied to its manufacture.
- Determination of the **approach that will be taken to assessing the Excipient Manufacturers compliance** to the required GMP.
- Assessment of the outcome of the compliance assessment **to determine the overall Excipient Manufacturer's risk profile** against the criteria outlined in the guideline. This will create the Excipient Manufacturers Risk Profile.

The tool creates summary reports which will capture the overall output of the RATE activities at a point in time while the audit trail is maintained in the individual documents to comply with the data integrity requirements.

For further information on McGee Pharma International's Risk Assessment Tool for Excipients (RATE) and to request a demonstration, contact us at +353 1 846 47 42 or info@mcgeepharma.com.