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**美国FDA最新BMV修改草案及目前热点讨论内容**  
***FDA 2013 BMV Guidance Draft & Current US BA Industrial  
Discussion Focus Points***

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# Outlines (纲要)

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- **Current BA practice in USA**  
(目前美国生物样品分析工作的现状)

# Guidance for Industry

## Bioanalytical Method Validation

### 生物样品分析方法学确证的指导原则草案

#### *DRAFT GUIDANCE*

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 90 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit electronic comments to <http://www.regulations.gov>. Submit written comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

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U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)  
Center for Veterinary Medicine (CVM)

September 2013  
Biopharmaceutics

Revision 1

✓ 2<sup>nd</sup> FDA BMV Guidance, 13 years after 2001 guidance

(13年后, 出台修改草案)

✓ Released Sept 12, 2013 with a 90-day review and comment period

(给与90天提意见的时间)

<http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM368107.pdf>

✓ Currently a DRAFT (修改草案)

➤ Don't change your SOPs yet  
(不必马上修改SOP)

➤ Study and gather comments (审阅和提供意见)

➤ Collected feedbacks in Dec 3-5, 2013 (讨论和搜集了工业界意见)

➤ FDA received 300 pages of comments (已搜集了300页意见)

➤ Pending for FDA internal discussion (FDA内部审定)

# History of FDA BMV Guidance

## (FDA BMV指导原则历史)

Crystal City WS/Conf (水晶城研讨会)	Main Topics/Focus (主要研讨会的议题)	Guidance/Report (研讨会结果)
Dec 3-5, 1990 (1 <sup>st</sup> )	1 <sup>st</sup> BMV conference between FDA & Pharma/CRO to discuss how to conduct BMV (FDA与药业界的第一次研讨会, 商讨如何进行生物样品分析方法学的确证-BMV)	Workshop Report: Shah, V.P. et al., Pharmaceutical Research: 1992; 9:588-592
Jan 12-14, 2000 (2 <sup>nd</sup> )	Revisited BMV after a decade practice of Bioanalytical to define fundamental parameters: <b>Accuracy /Precision/Selectivity/Sensitivity/ Stability</b> (经过十年生物样品分析方法学确证的实践, 确定了BMV的基本确证参数和标准)	- Workshop Report: Shah, V.P. et al., Pharmaceutical Research: 2000;17: 1551-1557 - <b>FDA 2001 BMV Guidance, May 2001</b>
May 1-3, 2006 (3 <sup>rd</sup> )	Discussed and clarified issues & questions in 2001 FDA BMV Guidance, mainly related <b>Stability Experiments, LBA and ISR</b> (讨论和解释了2001-MBV中的一些含糊点, 着重讨论了稳定性试验和大分子分析方法, 并提出ISR的必要性。)	Workshop Report: Viswanathan, C.T., Pharmaceutical Research: 2007; 24: 1962-7
Feb 2008 (4 <sup>th</sup> )	Required Incurred Sample Reanalysis ( <b>ISR</b> ) (正式要求必须做ISR)	Workshop Report: Fast, D., AAPS Journal: 2009; 11: 238-241
Dec 3-5, 2013 (5 <sup>th</sup> )	Discussed and collected feedbacks to " <b>FDA 2013-9 Draft Guidance</b> " between Agency & Pharma/CRO (激烈的讨论了FDA的BMV修改草案)	Pending for the final version of new FDA BMV Guidance

## Current Communication Channels between Pharma/CRO and FDA regarding 2013-9 BMV Draft Guidance (目前药厂及合同研究实验室与FDA对修改草案意见的主要沟通渠道)

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(美国药业协会) AAPS: <http://www.aaps.org/BMV/>

(国际生物样品分析协会) GBC: <http://www.globalbioanalysisconsortium.org/>

(国际合同研究实验室协会) GCC: <https://sites.google.com/site/globalcrocouncil/>

(欧洲生物样品分析协会) EBF: <http://www.europeanbioanalysisforum.eu/>

(美国QA协会) SQA: <http://www.sqa.org/>

(国际创新与质量控制协会) IQ Consortium: <http://iqconsortium.org/>

# Pharma/CRO General Comments to FDA 2013-9 BMV Draft Guidance (药厂及合同研究实验室对FDA修改草案的主要评论)

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- ✓ Finally come out after 13-year practice of 2001 BMV guidance! But.....  
(经过13年的2001版BMV实施, 新版BMV修改草案终于出台了, 但是.....)
- ✓ Connect BMV with GLP (21 CFR Part 58) & Clinical Study (21 CFR 320.29)  
(将BMV与GLP和临床研究连接起来 - BMV指导下的生物样品分析)
- ✓ Cover new BA fields and technologies (DBS, Biomarkers, Endogenous Compounds, Diagnostic Kits, etc. )  
(包括了新的技术领域)
- ✓ Provide a simple tabulated MV/SA report examples  
(提供了简单表格化的报告样本)

# Pharma/CRO General Comments to FDA 2013-9 BMV Draft Guidance (药厂及合同研究实验室对FDA修改草案的主要意见)

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- Different document structure from 2001 BMV Guidance  
(不同于**2001BMV**的文件格式和章节结构)
- No clear connection to existing white papers, conference reports, and publications related to current BA industrial practices  
(没有与已发表的白皮书, 会议报告, 文献及目前的实际应用相联系)
- No clear harmonization with EMA 2012 BMV Guideline  
(没有体现与**EMA2012**指导原则的合理协调)
- Treat LBA section similar to SM LC-MS section  
(将小分子液质联用的要求应用到配体结合测定法)

# Major Potential Impacts on Current BA Practice

(FDA修改草案对目前美国生物样品分析操作的主要潜在影响)

Concerns (关注点)	Industrial comments (药业界的评论及意见)	FDA rep response (FDA代表的反应)
Treat IS same as Analyte RS (对内标与分析对照品的同样要求)	Difficult & not necessary (有困难, 没必要)	Prefer CoA, but may accept option (期待有分析证书, 但可能接受其它数据)
Expired RS impact on stocks (过期对照品对标准液的影响)	Exp RS shouldn't impact stocks (过期对照品应不影响标准液)	May consider stock stability approach (可能考虑接受标准液稳定性数据)
6 A/P runs vs 3 core runs (6个与3个A/P分析批)	3 core runs sufficient (3个A/P分析批)	May consider to remove "6" (可能考虑保持3个A/P分析批)
PMV for different analysts (确证不同分析人员)	Not necessary (没必要)	Emphasize analyst training (强调分析人员的培训)
ULOQ A/P $\pm$ 15% (定量上限的 $\pm$ 15% A/P)	Not necessary (没必要)	May consider to remove it (可能考虑去掉此项要求)



# Major Potential Impacts on Current BA Practice

(FDA修改草案对目前美国生物样品分析操作的主要潜在影响)

Concerns (关注点)	Industrial comments (药业界的评论及意见)	FDA rep response (FDA代表的反应)
Same sub samples in one run (同一受试者的样品在同一分析批中分析)	Not apply to all studies (不适用于所有研究专题)	Not sure yet, (没明确表态, 也许强调生物等效性专题)
Co-meds LTS (共存药物的长期稳定性)	No impact observed (没有观察到影响, 不必要)	Maybe, e.g. co-dose BE (可能保持此要求, 如, 联合给药生物等效性专题)
Report both original & reintegration data (同时报告原始数据和重积分数据)	Filed but no need report both (保存记录, 但是不必要报告)	May require both (可能保持此要求, 都报告)
ISR by fresh calibrators (使用新鲜制备的标准曲线测定ISR)	Not necessary (不必要)	Consider industrial opinions (考虑药业界观点)
MD summary in MV report (在MV报告中对MD进行总结)	Difficult doc & not necessary (记录繁琐, 且不必要)	Require a MD summary in MV (要求在MV报告中对MD进行总结)

## FDA 2013-9 BMV Guidance Draft vs EMA 2012 BMV Guideline (FDA2013-9的BMV指导原则和EMA 2012-BMV指导原则对比)

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- Fundamentally follow same principles, “do good science and documentation”  
(同样的基本原则, “严谨科研和良好记录”)
- Different BMV structures  
(不同的BMV文件格式和章节结构)
- EMA 2012 BMV = FDA 2001 BMV + White Papers/Conference Reports/Publications  
(EMA 2012 BMV基于FDA 2001 BMV和历年的白皮书, 会议报告及文献)
- EMA allows IS without CoA but with sufficient data to support its use  
(EMA允许内标化合物没有分析证书, 但有其它支持数据)
- EMA emphasizes matrix factor (MF) but FDA just want “method recovery”  
(EMA强调生物介质系数, 但FDA只要求方法的“总回收率”)
- EMA recommends to assess haemolysed and hyperlipidaemic plasma samples but FDA BMV draft does not describe this requirement  
(EMA建议测试溶血血浆和高脂血浆样品的影响, FDA修改草案没有提及此项要求)
- Different regulatory auditing approaches  
(不同的法规审查方式和态度)

# New Sections FDA BMV Draft (FDA BMV草案中的新增内容)

## ➤ Endogenous Compounds (内源性物质)

- Prefer calibrators in analyte-free same biological matrix as samples  
(使用与未知样品相同的空白生物介质配置标准样品)
- When using alternate analyte-free matrix (e.g., buffers, dialyzed serum) , should demonstrate **no matrix effect**  
(使用其他替代介质配制时, 应表明无介质效应的影响)
- Need same matrix QCs covering measured sample concentrations  
(使用相同的介质制备QC样品, 覆盖未知样品的测定浓度)

## ➤ Biomarkers (生物标记物)

- Generally follow a fit-for-purpose approach (通常遵循“按特定需要”的方法)
- But when it is used to support a regulatory action, such as safety/efficacy, assay needs to be fully validated according to BMV (但是当应用于法规范畴的研究时, 比如安全性/有效性, 分析方法需要根据BMV进行全面确证)

## ➤ Diagnostic Kits (诊断试剂盒)

- When a diagnostic kit is used for PK/PD studies, site-specific validation should be performed to demonstrate its suitability for use (当应用于PK/PD研究时, 测试实验室需要验证其适应性)

## ➤ New Technologies (新技术)

- Use Dried Blood Spot (DBS) as an example, which may be useful in individual cases, but the method has not yet been widely accepted. (DBS技术已经在个别研究中有所应用, 但是该方法还没有被广泛接受)

## ➤ Report Format examples in Appendix (附录中提供了报告样本)

# Messages from FDA & EMA

## (来自FDA和EMA的信息)

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- Do good science (严谨科研)
- Well documentation (良好记录)
- Ensure study integrity (保证专题完整性)
- May follow most stringent requirements when handling uncertain issues (处理有争议的问题时，需要遵循最严格的要求)
- Guidance offer recommendations for complying with regulations; do not bind Agency or Industry (指导原则提供建议，目的是符合法规的要求；不是用来约束法规机构或工业界)

# Some 483 Driving Issues

## (常见的483影响)

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- ❖ System suitability test independency from STD/QC/Samples  
(系统测试样品是否独立于**STD/QC**和未知样品)
- ❖ Co-meds LTS for BE Studies  
(联合给药生物等效性专题，是否有共存药物的长期稳定性)
- ❖ Different stocks for STD and QC even after qualified two stocks  
(是否用两份不同的储备溶液分别制备**STD**和**QC**)
- ❖ Qualify different bulk STD/QC samples during a study  
(是否验证不同批量的介质**STD/QC**样品)
- ❖ IS variation impact assessment  
(是否检查及评估内标物信号的变化及影响)

# Current BA Practice in USA

## (当前美国生物样品分析领域的实际做法)

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- ✓ Follow 2001 BMV with 3<sup>rd</sup> & 4<sup>th</sup> Crystal City Conference reports/white papers  
(结合白皮书和会议报告执行**2001 BMV**)
- ✓ Adjust SOPs and practice considering FDA 483s  
(根据**FDA 483s**, 调整**SOPs**和实际做法)
- ✓ Consider EMA 2012 BMV guideline, especially for globe submissions  
(对用于国际性报批的专题, 参考**EMA2012 BMV**)
- ✓ Assess hemolyzed and lipemic samples when needed  
(根据专题需要, 测试溶血血浆和高脂血浆样品的影响)
- ✓ Assess analyte stability in whole blood prior to centrifugation  
(测试分析物在离心前全血中的稳定性)
- ✓ May conduct LTS to cover highest subject sample concentration (e.g., QCD)  
(考虑测试分析物在样品中预期最高浓度的稳定性)

# Current BA Practice in USA

## (当前美国生物样品分析领域的实际做法)

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- ✓ May conduct co-meds LTS for BE studies  
(联合给药生物等效性专题，考虑测试共存药物在样品中的长期稳定性)
- ✓ Assess IS response variations  
(检查及评估内标物信号的变化及影响)
- ✓ Assess carryover impact  
(检查及评估进样残留物的影响)
- ✓ Conduct ISR for all BE & pivotal PK studies  
(对所有生物等效性和关键性PK专题，做ISR)
- ✓ More ELN use in Pharma and limit ELN use in CRO  
(大药厂更多的使用ELN，仅有少数CRO使用ELN)

# Current Hot Topics in US Bioanalysis (现在美国生物样品分析的热点话题)

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- ❖ When and What will be FDA new BMV guidance? (何时, 何样的新**BMV**出台?)
- ❖ Antibody-Drug Conjugate (ADC) (抗体-药物结合体)
- ❖ Biotherapeutics (large molecules) BMV by LC-MS (液质联用技术分析大分子药物的**BMV**)
- ❖ Biomarker quantification by LBA & LC-MS/MS (配体结合方法& **LC-MS/MS**对生物标记物进行定量)
- ❖ Emerging technologies in Regulated Bioanalysis (新兴技术在法规领域的生物样品分析中的运用)
- ❖ ISR vs ISS (真实样品再分析和真实样品的稳定性)
- ❖ Wet microsampling, e.g., Capillary, etc. (液体微量取样)
- ❖ Microflow LC-MS/MS (微流液质联用技术)
- ❖ Biotransformation of biotherapeutics (大分子药物的生物转化)
- ❖ GCP+GLP = GCLP => Clinical sample collection (**GCLP** 指导下的临床样品采集)



# Continued Topics in US Bioanalysis (美国生物样品分析的持续性话题)

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- ✓ Hemolyzed plasma (2009-2012 white papers) (溶血血浆)
- ✓ Metabolite impact & use of incurred samples (2009-2013 white papers) (代谢物影响及真实样品的使用)
- ✓ Tissues analysis (2010-2011 white papers) (组织样品分析)
- ✓ Incurred Sample Stability (ISS, 2013 white paper) (真实样品稳定性)
- ✓ Lipemic plasma (2013 white paper) (高脂血浆)
- ✓ Dry Blood Spot (DBS, 2012-2013 white papers) (全血干燥取样)
- ✓ Sample handling & cold chain management (2010 white paper) (样品采集处理以及冷链管理)
- ✓ Fit-to-purpose validation (2010, 2011, 2013 white papers) (按照特定需要的方法确证)
- ✓ Immunogenicity (2013 white paper) (免疫原性反应)
- ✓ Whole blood stability evaluation (2009, 2011, 2013 white papers) (分析物在全血中的稳定性评价)
- ✓ Variability of internal standard (IS, 2011 & 2012 white papers) (内标信号变化性的影响)
- ✓ Matrix storage stability with co-med drugs (2011-2012 white papers) (共存药物在介质中的储存稳定性)

# Some Practical Points in Bioanalytical Operation (生物样品分析实验室运行中的一些要点)

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- Differences in CRO vs Pharma, e.g., follow FDA or EMA or both? How to conduct impact assessment ?  
(对CRO和药企的不同影响, 比如, 遵循FDA /EMA两者同时? 怎样评估影响?)
- Focus on each study design and specific issues (重视具体专题的设计和特殊性)
- Know “your analyte & sample matrix” (了解你面对的分析物及样品介质)
- Well documented MD helps MV and SA (良好记录的MD有助于MV和SA)
- Monitor and control operational errors and separate them from method performance issues (监督和控制操作失误, 区分方法误差与操作失误)
- Address method performance issues as early as possible (及时解决方法使用中的问题)
- Standardized and consistent experimental procedures (标准化和一致性的实验程序)
- Simplified and standardized data filing and documentation (简化并标准化数据储存和记录程序)
- Well trained scientists (受过良好培训实验人员)



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***Questions?***

