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# Highly Variable Drugs: Experience with Propafenone

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# Highly Variable Drugs

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- Drugs that exhibit variable disposition kinetics in the body
- Intra-subject cv  $>30\%$  in bioavailability parameters
- Challenge - have long been a problematic group of drugs for bioequivalence assessment

# What Is Bioequivalence?

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- Bioequivalence is a means of comparing two formulations or products
  - It determines if they deliver the same amount of drug into the body at the same rate
  - Brand vs itself or generic vs brand

# Criteria For Bioequivalence

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- The test should be within 80 to 125% of the reference
- Employ confidence interval testing (eg. 90%) of the ratios for greater assurance
- Works well with most drugs
  - Difficult to meet for highly variable drugs
  - eg. PROPAFENONE

# Propafenone

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- Is an antiarrhythmic agent - used for ventricular arrhythmias
- Is nearly completely absorbed following oral administration
- Undergoes extensive first-pass hepatic metabolism
- Has a wide range of  $t_{1/2}$ 
  - eg. 2 - 32 hrs

# Bioequivalence Of Propafenone Tablets

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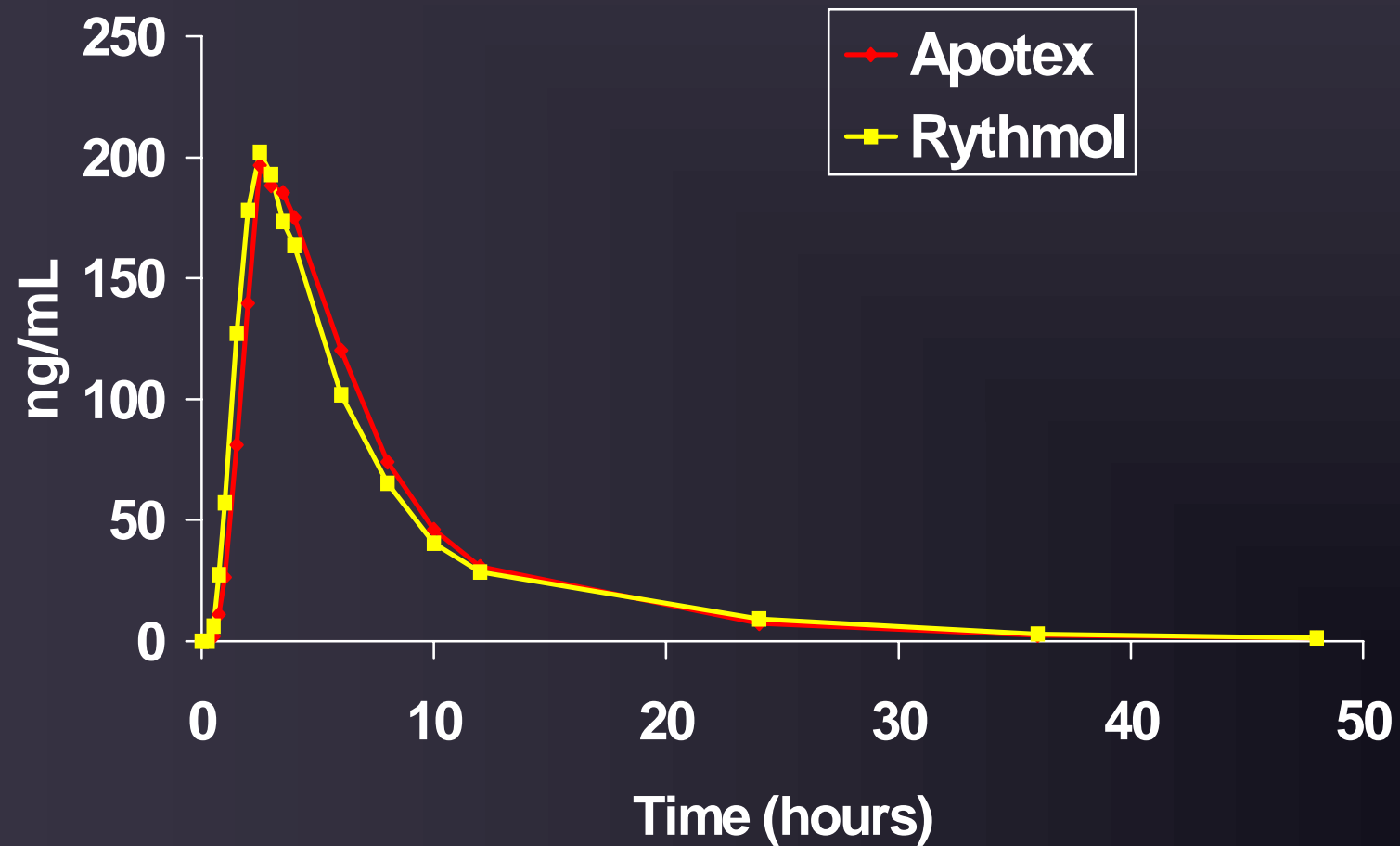
- Comparative bioavailability study
  - Apotex vs Rythmol
- Study design
  - Standard randomized 2-way crossover
  - Single dose: 1 x 300 mg tablet given after a 10-hour fast
  - 18 healthy male volunteers
  - Washout period: 1 week

# Cont'd

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- Serial blood samples were collected for 48 hours
- Plasma propafenone levels measured by a validated HPLC/UV method
  - Limit of quantitation = 5.0 ng/mL
  - Precision: 2.5 - 9.5 % cv

# Mean Plasma Concentrations



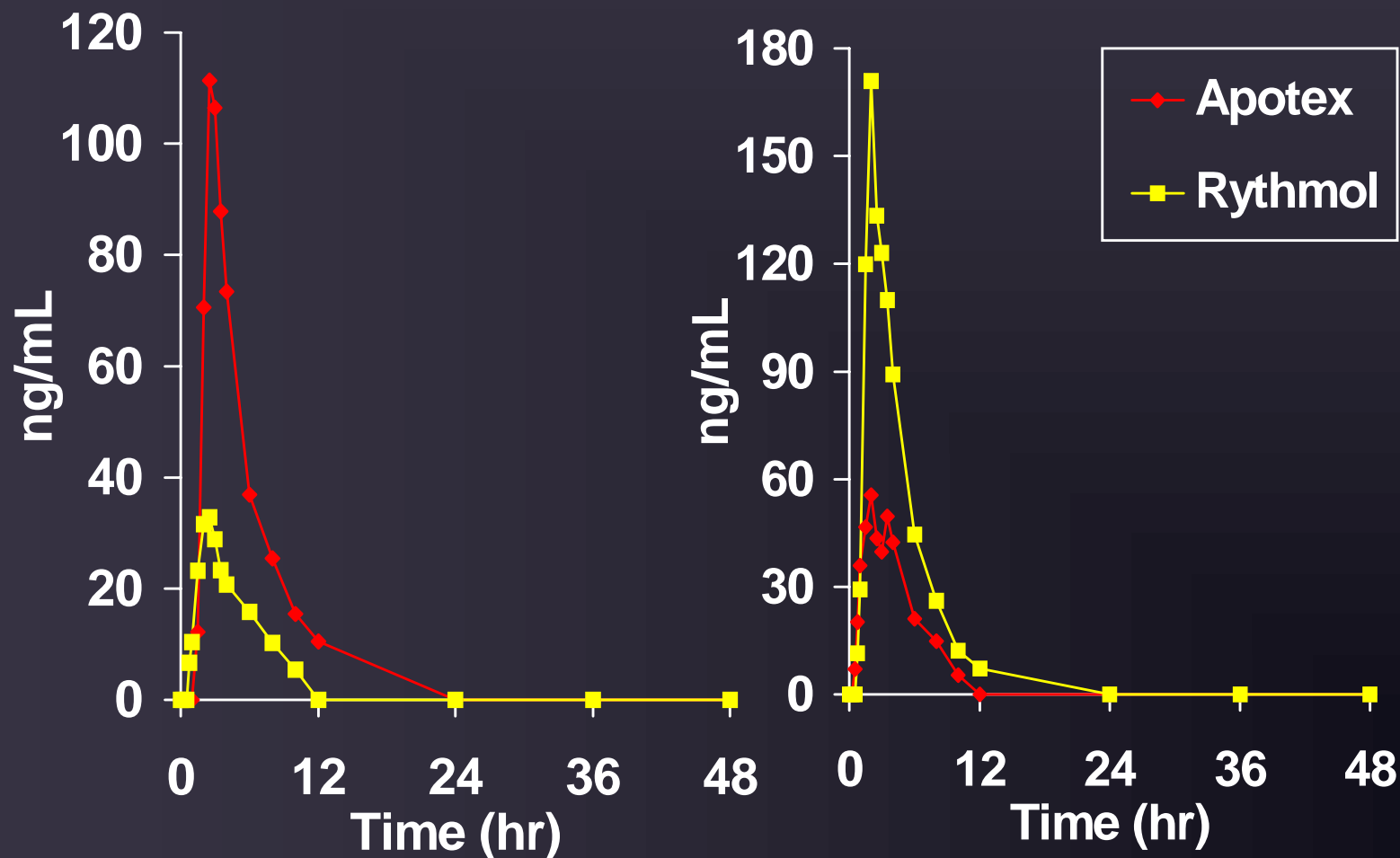


# Results

<u>Parameter</u>	<u>Mean (cv)</u>		<u>ANOVA</u>
	<u>Apotex</u>	<u>Rythmol</u>	
AUC <sub>T</sub> (ng*hr/mL)	1377 (139)	1398 (144)	p=0.32
C <sub>max</sub> (ng/mL)	223 (84)	219 (92)	p=0.45
T <sub>max</sub> (hr)	2.94 (34)	3.08 (31)	p=0.66
t <sub>1/2</sub> (hr)	2.92 (63)	3.31 (68)	p=0.58

Note: Log-transformation for AUC<sub>T</sub> and C<sub>max</sub>

# Plasma Profiles From Two Subjects



# Results - Cont'd

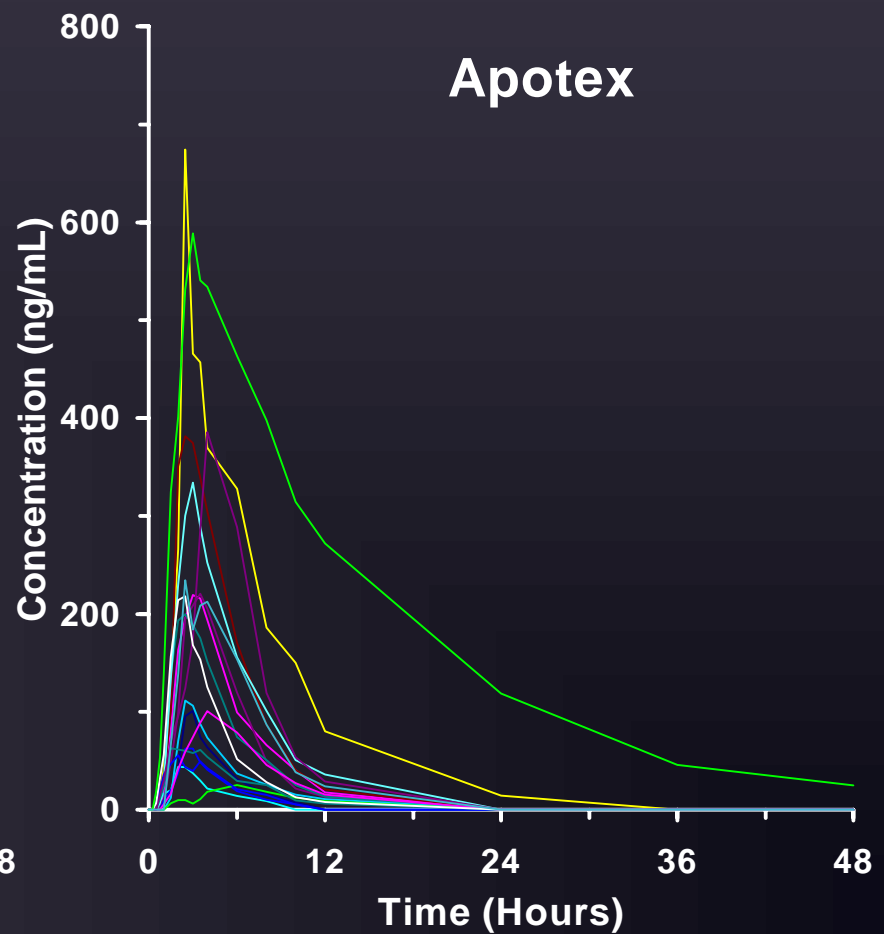
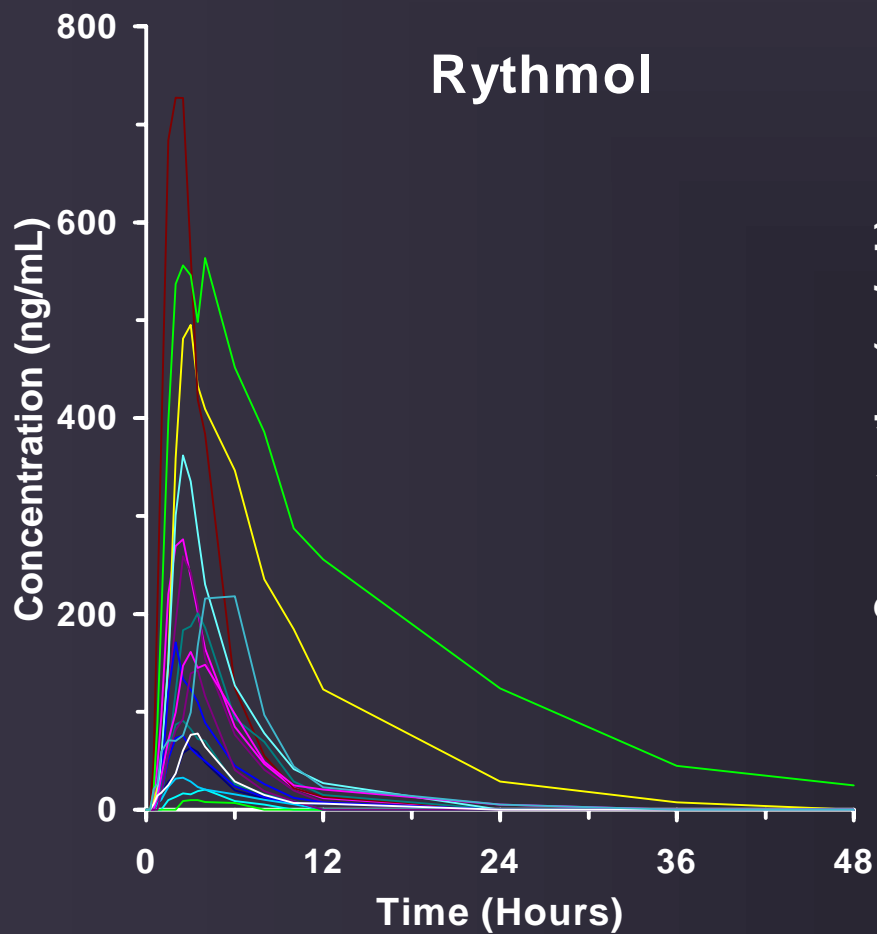
<u>Parameter</u>	<u>Test/Ref</u> <u>(%)</u>	<u>90%</u> <u>CI</u>	<u>CI Within</u> <u>80-125%</u>
AUC <sub>T</sub> (ng*hr/mL)	117	84-162	No
C <sub>max</sub> (ng/mL)	113	81-156	No

# Reasons For Failure

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- In-vitro dissolution profiles were similar
  - >95% dissolved by 30 min in 0.1 N HCl
  - Bioavailability is absorption-rate limited
- Believe that the formulation is OK!
- Inter-subject cv: >100% for  $AUC_T$
- Intra-subject cv ( $\sqrt{MSE}$ ) = 46%
  - A highly variable drug
  - Apparent lack of BE was probably due to highly variable disposition

# Inter-subject Variability



# Sources Of Variability

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- Metabolism (hydroxylation) of propafenone is genetically determined
  - Fast ( $t_{1/2}$ : 2-10 hr) vs slow ( $t_{1/2}$ : 10-32 hr) metabolizers
    - 5x higher drug levels in slow metabolizers
  - Ultra-fast metabolizer?
    - High first-pass metabolism
    - Lower levels, closer to LOQ of the assay, less precise

# Sources Of Variability - Cont'd

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- Hydroxylation of propafenone is saturable
  - Nonlinear increase in BA as dose increases in fast metabolizers
  - Kinetics is linear in slow metabolizers
- Higher variability with fast metabolizers
- Problem is magnified after log-transformation
  - For a given difference, the smaller the values, the larger the difference between the logs

# Re-analysis Of BE Data

- Analyze the “slow” metabolizers only
  - No criteria found in the literature
  - Use the median across subjects as cut-off
  - 8 subjects were selected
    - had  $AUC_T > \text{median}$  for both products

	<u>Intra-subject cv</u>	<u>90% CI</u>
$AUC_T$	11%	82-101
$C_{\max}$	20%	75-112



# Proof Of High Variability

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- Part of a large study
- Rythmol was given to the same subject on two occasions separated by 1 week
- $n = 16$
- Inter-period ratio: 0.37-2.09 for  $AUC_T$  and 0.39-2.25 for  $C_{max}$
- Intra-subject  $cv = 29\%$  for both parameters

# What is n for demonstrating BE With CV = 29%?

- Assuming no difference (brand vs brand) and 90% probability of acceptance, n=40 subjects
- With a 5% difference due to chance (generic vs brand), n=52 subjects
- In Canada, propafenone is classified as a drug with a narrow therapeutic range
  - 95% CI
  - A fasting and a food challenge study
- Even higher n!

# Bioequivalence Standards: Do We Have The Right Balance?

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- For most drugs, current “Report A” and “B” standards of TPD are appropriate
- For HVD, they are inappropriately austere
  - The tighter standards for propafenone are clearly unjustified
  - The current goalposts are too narrow when biological variability is so high
  - It is unethical and costly to require a large number of subjects

# What Is The Right Balance?

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- Standards should be reasonable
  - When the brand has trouble passing against itself, it indicates the criteria are unrealistically austere
  - In such cases new criteria should be established and such criteria should not be more onerous than the current one
- Regulatory authority should be responsive in accepting new criteria

# Acknowledgement

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- David Dawod