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World Health Organization  
International Nonproprietary Names (EMP/RHT/TSN/INN)  
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**Re: USP Comments on the INN BQ Proposal**

The United States Pharmacopeial Convention (USP) appreciates the opportunity to provide comments on the INN Biological Qualifier (BQ) proposal. USP supports the efforts of WHO's INN expert group to develop a consensus-based global approach to the naming of all biologicals that is consistent with existing, accepted scientific principles critical to the quality assessment of these drugs. Hence, USP supports the concept of a BQ that would apply to all biologics, and agrees that the BQ should not be part of the nonproprietary name itself in order to assure consistency with currently applied compendial approaches.

1. Background and context

USP's role in naming – legal basis

Where there is an applicable compendial standard, a drug is deemed misbranded in the United States unless its label bears the "official title" recognized in the *United States Pharmacopeia-National Formulary (USP-NF) (Federal Food Drug and Cosmetic Act (FDCA) 502(e)(1 & 3))*.

FDCA & Public Health Service Act drugs recognized in *USP-NF* are deemed adulterated or misbranded if they fail to meet USP standards for identity, strength, quality or purity (*FDCA 501(b), 502(e); 21 CFR 299.5*) and packaging & labeling (*FDCA 502(g)*).

If there is no applicable *USP-NF* monograph at the time of drug approval, the Food and Drug Administration (FDA) designates an "interim established name," that exists only unless and until USP designates a name. Congress did give FDA authority to designate an official title/name that supersedes any name designated by USP. But it cannot be done in through approval of a New Drug Application (NDA) or Biologics License Application (BLA) – the only way to override USP is by using notice and comment rulemaking (*FDCA 508*).

Name and compendial identity

*USP General Notices*

*5.40. Identity*

*A compendial test titled Identity or Identification is provided as an aid in verifying the identity of articles as they are purported to be, e.g., those taken from labeled containers, and to establish whether it is the article named in USP–NF.*

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USP monographs contain a test for Identity, or Identification, used to establish whether an article is that named in the *USP-NF*. The Identity test is used to determine to which drugs/biologics a particular *USP-NF* monograph standard applies. When two or more biologics, for example, fall under the same Identity test, they must conform to the compendial quality standards in the monograph, or risk being out of conformance with the applicable USP standard. Compendial identity is distinct and quite different from regulatory identity. Only the relevant regulator has the authority under various laws to clear a drug for marketing, or to determine that two drugs are the same, similar, identical, or interchangeable. Where two biologics share a compendial identity, this does not mean they are one and the same drug; only that they are subject to one and the same USP standard for quality.

#### USP's INN and USAN involvement – timing

International Nonproprietary Names (INN) are given to most drugs very early in development. Many of these drugs never make it onto the market. For the United States, the United States Adopted Names Council (USAN) next names medicinal articles (see *USP Dictionary*), usually also well before licensure. While USP has expert representation in both INN and USAN deliberations, USP's official US role in naming as described above usually does not come into play until much later in the lifecycle of a licensed drug, when a monograph is developed.

#### Process and principles behind USP's naming responsibility

The USP Nomenclature, Safety and Labeling (NSL) Expert Committee is the decision making body that designates official titles for the *USP-NF*. The committee does so in close consultation with the relevant expert committees that review and approve the associated monograph tests and specifications. The NSL expert committee in the review process carefully considers existing INN and USAN names, as well as proposed monograph tests and acceptance criteria, especially with regard to article identity. In many, if not most cases, the *USP-NF* monograph title will ratify a previously given INN or USAN name, as the USP expert committee considers compendial naming based on many of the same scientific and nomenclature principles as applied by INN and USAN.

#### 2. The INN BQ and USP naming

USP continues to support the efforts of WHO's INN expert group to develop a global approach to the naming of all biologics, not just biosimilars. USP considers finding a broadly agreed upon solution that is built on and consistent with existing, accepted scientific principles critical to supporting a globally relevant approach to the quality assessment of biologics. For these reasons, USP is very supportive of the BQ proposal, and in particular the principle that the BQ should apply to all biologics. USP considers it essential that the BQ is not part of the nonproprietary name itself, meaning that the BQ would also not be considered part of any applicable compendial name. This will allow consistency with currently applied approaches and not disturb existing precedent where multiple non-interchangeable biologics share the same compendial name and monograph specifications, for example Glucagon and Somatropin.