

AAVPT position paper regarding the evaluation of scientific manuscripts that involve the administration of compounded drugs to animals.

The AAVPT formed a committee of experts which included veterinary pharmacologists and regulators from Industry, Academia and the FDA, to review both the law and ethics of conducting and publishing research on animals where such research involves the administration of an unapproved compounded drug substance. This committee's findings are detailed below.

Given that:

1) The FDA permits the practice of compounding from FDA-approved animal and human drugs for use in companion animals within a valid veterinarian-client-patient relationship, as long as there are no approved drugs that, when used either as labeled or in a extra-label manner, will appropriately treat the condition diagnosed.

2) In assessing the 'appropriateness' of the manufacture and use of compounded products in a research or clinical trial setting, the FDA has two primary concerns.

a. Whether the compounded new animal drug products are manufactured and distributed in a manner that is clearly intended to circumvent the drug approval process.

b. Whether the use of compounded new animal drug products in a research or clinical trial setting may result in illegal residues in meat, milk, eggs, honey, aquaculture, or other food-producing animal products. Withdrawal times for compounded food animal drugs should be established by the prescribing veterinarian and not by the compounding pharmacist. Investigators conducting studies that are not part of an INAD would assume all responsibility to ensure that the food supply is kept safe.

3) The purpose of an Investigational New Animal Drug (INAD) designation is to permit the interstate shipment of unapproved drugs intended for use in animals so that firms can conduct investigations to obtain the safety and effectiveness data ultimately needed to support FDA approval of the drug. The CVM no longer issues INADs to private practitioners, zoo veterinarians, etc., for the purpose of obtaining investigational drugs, unapproved drugs, or chemical substances for use in treating animals in special situations, unless the information related to such use will be used in supporting the approval of a new animal drug application.

The AAVPT expert review finds no impediment to publication of research in which compounded drugs have been administered to animals, if the following conditions are met::

- 1) A rational protocol, good study design, proper data analysis (descriptive or quantitative statistics) and well-supported written conclusions of clinical or research outcomes.
- 2) IACUC approval for the study.
- 3) Informed consent for client-owned pets, if the pet is to receive a compounded drug.
- 4) For food animal administration, clear documentation of tissue residues and appropriate withdrawal times, based on the existing research literature and sound pharmacological principles.
- 5) Sufficient detail regarding the method of compounding and drug delivery system to allow replication of the compounded product by other investigators, to include:
 - a. Final concentration of all ingredients
 - b. Identity and source of excipients
 - c. Stability data, if available
- 6) An INAD is not required for manuscripts describing the use of compounded drugs, unless data generated will be used to support a new animal drug application.

References:

- a) Title 21, Code of Federal Regulations, Part 530.13 (21 CFR 530.13), "Extralabel use from compounding of approved new animal and approved human drugs."
- b) Federal Food, Drug and Cosmetic Act
- c) Compliance Policy Guide (CPG), Section 608.400 (CPG 608.400), "Compounding of Drugs for Use in Animals."
- d) Office of the Center for Veterinary Medicine (CVM)