### ICH HARMONISED GUIDELINE

### BIOPHARMACEUTICS CLASSIFICATION SYSTEM-BASED BIOWAIVERS

# ICH M9 指引之意見彙整表

段落	標題	內文	相關建議及意見
			(請提供中英文內容)
1-22		1.1. Background and Objective Two drug products	
		containing the same active substance are considered	
		bioequivalent if their	
		bioavailabilities (rate and extent of drug absorption) after	
		administration in the same molardose lie within acceptable	
		predefined limits. These limits are set to ensure comparable	
		in vivo performance, i.e., similarity in terms of safety and	
		efficacy. In in vivo bioequivalence studies, the pivotal	
		pharmacokinetic parameters AUC (the area under the	
		concentration time curve), and C <sub>max</sub> (the maximum	
		concentration), are generally used to assess the rate and	
	INTRODUCTION	extent of drug absorption.	
		The BCS (Biopharmaceutics Classification System)-based	
		biowaiver approach is intended to reduce the need for in	
		vivo bioequivalence studies i.e., it can provide a surrogate for	
		in vivo bioequivalence. In vivo bioequivalence studies may be	
		exempted if an assumption of equivalence in in vivo	
		performance can be justified by satisfactory in vitro data. The	
		BCS is a scientific approach based on the aqueous solubility	
		and intestinal permeability characteristics of the drug	
		substance. The BCS categorizes drug substances into one of	
		four BCS classes as follows:	
		Class I: high solubility, high permeability	

		Class II: low solubility, high permeability
		Class III: high solubility, low permeability
		Class IV: low solubility, low permeability
		This guidance will provide recommendations to support the
		biopharmaceutics classification of drug substances and the
		BCS-based biowaiver of bioequivalence studies for drug
		products.
23-34		1.2 Scope
		BCS-based biowaivers may be used to demonstrate
		bioequivalence for example between products used in early
		clinical development through commercialization, for line
		extensions of the same pharmaceutical form of innovator
		products, in applications for generic drug products, and
		post-approval changes that would otherwise require in vivo
		bioequivalence evaluation, in accordance with regional
		regulations. The BCS-based biowaiver is only applicable to
		immediate release, solid orally administered dosage forms or
		suspensions designed to deliver drug to the systemic
		circulation. Drug products having a narrow therapeutic index
		are excluded from consideration for a BCS-based biowaiver in
		this guidance. Fixed-dose combination (FDC) products are
		eligible for a BCS-based biowaiver when all drug substances
		contained in the combination drug product meet the criteria
		as defined in sections 2 and 3 of this guidance.
36-44	BIOPHARMACEUTICS	BCS-based biowaivers are applicable to drug products where
	CLASSIFICATION OF	the drug substance exhibits high solubility and, either high
	THE DRUG	permeability (BCS Class I) or low permeability (BCS Class III).
	SUBSTANCE	A biowaiver is only applicable when the drug substance(s) in

	test and reference products are identical. For example, a	
	biowaiver is not applicable when the drug substance in the	
	test product is a different salt, ester, isomer, or mixture of	
	isomers from that in the reference product. Pro-drugs may	
	be considered for a BCS-based biowaiver when absorbed as	
	the pro-drug.	
46-73	2.1. Solubility	
	A drug substance is classified as highly soluble if the highest	
	single therapeutic dose is completely soluble in 250 ml or	
	less of aqueous media over the pH range of 1.2 – 6.8 at 37 $\pm$	
	1°C. In cases where the highest single therapeutic dose does	
	not meet this criterion but the highest strength of the	
	reference product is soluble under the aforementioned	
	conditions, additional data should be submitted to justify the	
	BCS-based biowaiver approach.	
	The applicant is expected to establish experimentally the	
	equilibrium saturated solubility of the drug substance over	
	the pH range of 1.2 – 6.8 at 37 $\pm$ 1°C using a shake-flask	
	technique or an alternative method, if justified. At least three	
	buffers within this range, including buffers at pH 1.2, 4.5 and	
	6.8, should be evaluated. In addition, solubility at the pKa of	
	the drug substance should be evaluated if it is within the	
	specified pH range. The pH for each test solution should be	
	measured after the addition of the drug substance and at the	
	end of the equilibrium solubility study to ensure the	
	solubility measurement is conducted under the specified pH.	
	The pH should be adjusted if necessary. The lowest measured	

	solubility over the pH range of $1.2 - 6.8$ will be used to	
	classify the drug substance.	
	A minimum of three replicate determinations at each	
	solubility condition/pH is necessary to demonstrate solubility	
	using a validated stability-indicating method, with	
	appropriate compendial references for the media employed.	
	In addition, adequate stability of the drug substance in the	
	solubility media should be demonstrated. In cases where the	
	drug substance is not stable with >10% degradation over the	
	extent of the solubility assessment, solubility cannot be	
	adequately determined and thus the drug substance cannot	
	be classified. In this case a BCS-based biowaiver cannot be	
	applied. In addition to experimental data, literature data may	
	be provided to substantiate and support solubility	
	determinations, keeping in mind that peer reviewed articles	
	may not contain the necessary details of the testing to make	
	a judgement regarding the quality of the studies.	
75-117	2.2. Permeability	
	The assessment of permeability should preferentially be	
	based on the extent of absorption derived from human	
	pharmacokinetic studies, e.g., absolute bioavailability or	
	mass balance.	
	High permeability can be concluded when the absolute	
	bioavailability is ≥ 85%. High permeability can also be	
	concluded if $\geq$ 85% of the administered dose is recovered in	

urine as unchanged (parent drug), or as the sum of parent drug, Phase 1 oxidative and Phase 2 conjugative metabolites. Regarding metabolites in feces only oxidative and conjugative metabolites can be considered. Metabolites produced through reduction or hydrolysis should not be included, unless it can be demonstrated that they are not produced by microbial action within the gastrointestinal tract. Unchanged drug in feces cannot be counted toward the extent of absorption, unless appropriate data supports that the amount of parent drug in feces to be accounted for absorbed drug material is from biliary excretion, intestinal secretion or originates from an unstable metabolite, e.g., glucuronide, sulphate, N-oxide that has been converted back to the parent by the action of microbial organisms.

Human in vivo data derived from published literature (for example, product knowledge and previously published bioavailability studies) may be acceptable, keeping in mind that peer reviewed articles may not contain the necessary details of the testing to make a judgement regarding the quality of the results.

Permeability can be also assessed by validated and standardized in vitro methods using Caco-2 cells(see Annex I). The results from Caco-2 permeability assays should be discussed in the context of available data on human pharmacokinetics. In vitro cell permeability assays (Caco-2) used in support of high permeability should be appropriately validated and standardized as outlined in Annex 1. If high

		permeability is inferred by means of an in vitro cell system,
		permeability independent of active transport should be
		proven as outlined in Annex I, "Assay Considerations".
		If high permeability is not demonstrated, the drug substance
		is considered to have low permeability (e.g. BCS class III).
		Instability in the Gastrointestinal Tract If mass balance
		studies or in vitro Caco-2 studies are used to demonstrate
		high permeability, additional data to document the drug's
		stability in the gastrointestinal tract should be provided,
		unless $\geq$ 85% of the dose is recovered as unchanged drug in
		urine. Stability in the gastrointestinal tract may be
		documented using compendial and simulated gastric and
		intestinal fluids or, with suitable justification, other relevant
		methods. Drug solutions should be incubated at 37°C for a
		period that is representative of the in vivo contact of the
		drug substance with these fluids, i.e., one hour in gastric fluid
		and three hours in intestinal fluid. Drug concentrations
		should then be determined using a validated stability
		indicating assay method. Significant degradation (>10
		percent) of a drug in this study could suggest potential
		instability.
119-138	SUPPORT OF THE	A drug product is eligible for a BCS-based biowaiver provided
	ELIGIBILITY OF A	that the drug substance(s) satisfy the criteria regarding
	DRUG PRODUCT FOR	solubility and permeability (BCS Class I and III), the drug
	A BCS-BASED	product is an immediate-release oral dosage form with
	BIOWAIVER	systemic action, and the drug product is a dosage form that is

	pharmaceutically equivalent to the reference product. In	
	cases where the highest single therapeutic dose does not	
	meet the high solubility criterion but the highest strength of	
	the reference product is soluble under the required	
	conditions, BCS-based biowaivers can be supported based on	
	additional data. An example of such additional data is	
	demonstration of dose proportional pharmacokinetics (i.e.	
	AUC and Cmax) over a dose range that includes the highest	
	therapeutic dose.	
	Drug products with buccal or sublingual absorption are not	
	eligible for a BCS-based biowaiver application. As such, an	
	orodispersible product is eligible for a biowaiver application	
	only if there is no buccal or sublingual absorption and the	
	product is labelled to be taken with water only	
	In order for a drug product to qualify for a BCS-based	
	biowaiver, criteria with respect to the composition	
	(excipients) and in vitro dissolution performance of the drug	
	product should be satisfied. The drug product acceptance	
	criteria are described in sections 3.1 and 3.2 below.	
140-194	3.1. Excipients	
	Excipient differences between the proposed test and the	
	reference products should be assessed for their potential to	
	affect in vivo absorption. This should include consideration of	
	the drug substance properties as well as excipient effects. To	
	be eligible for a BCS-based biowaiver, the applicant should	
	justify why the proposed excipient differences will not affect	

the absorption profile of the drug substance under
consideration, i.e., rate and extent of absorption, using a
mechanistic and risk-based approach. The decision tree for
performing such an assessment is outlined in Figures 1 and 2
in Annex II.
The possible effects of excipients on aspects of in vivo
absorption such as solubility, gastrointestinal motility, transit
time and intestinal permeability including transporter
151 mechanisms, should be considered. Excipients that may
affect absorption include sugar-alcohols, e.g., mannitol,
sorbitol, and surfactants, e.g., sodium lauryl sulfate. The risk
that a given excipient will affect the absorption of a drug
substance should be assessed mechanistically by considering
• the amount of excipient used,
• the mechanism by which the excipient may affect
absorption,
• absorption properties (rate, extent and mechanism of
absorption) of the drug substance.
The amount of excipients that may affect absorption in the
test and reference formulations should be addressed during
product development, such that excipient changes are kept
to a minimum. Small amounts included in the tablet coating
or levels below documented thresholds of effect for the
specific drug substance are of less concern.
By definition, BCS Class I drugs are highly absorbed, and have
neither solubility nor permeability limited absorption.
Therefore they generally represent a low risk group of

compounds in terms of the potential for excipients to affect absorption, compared to other BCS classes. Consideration of excipient effects for BCS ClassI drug products should focus on potential changes in the rate or extent of absorption. For example, if it is known that the drug has high permeability due to active uptake, excipients that can inhibit uptake transporters are likely to be of concern. For BCS Class I drugs that exhibit slow absorption, the potential for a given excipient to increase absorption rate should also be considered.

For BCS Class I drugs, qualitative and quantitative differences in excipients are permitted, except for excipients that may affect absorption, which should be qualitatively the same and quantitatively similar, i.e., within  $\pm$  10.0% of the amount of excipient in the reference product.

BCS Class III drug substances are considered to be more susceptible to the effects of excipients. These drugs are poorly permeable and may have site-specific absorption, so there are a greater number of mechanisms through which excipients can affect their absorption than for BCS Class I drugs. For BCS Class III drugs, all of the excipients should be qualitatively the same and quantitatively similar (except for film coating or capsule shell excipients). This is defined in Table 1. Examples of acceptable differences in excipients are shown in Annex II.

Table 1: Allowable differences in excipients for drug

 products containing	BCS Class III drugs	
Excipient class	Percent of the amount of excipient in the reference	Percent difference relative to core weight (w/w)
Excipients which	± 10.0%	
may affect		
absorption:		
All excipients:		
Filler		± 10.0%
Disintegrant		
Starch		± 6.0%
Other		- ± 2.0%
Binder		± 1.0%
Lubricant		
Ca or Mg		± 0.5%
stearate		
Other		± 2.0%
Glidant		
Talc		± 2.0%
Other		± 0.2%
	Total % chang	ge permitted: 10.0%
Note: Core does not	t include tablet film	coat or capsule shell
	ormulations containing only BCS Class I drugs, arding excipients should follow that for a BCS Class	
I drug. For FDC fo	rmulations containi	ng only BCS Class II

	drugs, or BCS Class I and BCS Class III drugs, criteria regarding
	excipients should follow that for a BCS Class III drug. This is
	applicable to FDCs which are pharmaceutically equivalent.
196-272	3.2. In vitro Dissolution
	When applying the BCS based biowaiver approach,
	comparative in vitro dissolution tests should be conducted
	using one batch representative of the proposed commercial
	manufacturing process for the test product relative to one
	batch of the reference product. The test product should
	originate from a batch of at least 1/10 of production scale or
	100,000 units, whichever is greater, unless otherwise
	justified. During a (clinical) development phase, smaller
	batch sizes may be acceptable, if justified. The comparative
	in vitro dissolution experiments should use compendial
	apparatuses and validated analytical methods.
	The following conditions should be employed in the
	comparative dissolution studies to characterize the
	dissolution profile of the product:
	<ul> <li>Apparatus: paddle or basket</li> </ul>
	• Volume of dissolution medium: 900 ml or less (it is
	recommended to use the volume selected for the QC
	test)
	• Temperature of the dissolution medium: 37 ± 1°C
	<ul> <li>Agitation: paddle apparatus - 50 rpm</li> </ul>
	basket apparatus - 100 rpm
	• At least 12 units of reference and test product should be
	used for each dissolution profile determination.

Three	buffers:	рΗ	1.2,	рΗ	4.5,	and	рΗ	6.8.
Pharma	acopoeial	buffe	rs sho	uld be	e empl	oyed.	Addit	ional
investig	gation ma	y be	requi	ed at	t the	pH of	mini	mum
solubili	ity(if diffe	rent f	rom t	he bu	uffers	above	). Pu	rified
water r	may be use	ed as	an ad	dition	al diss	olutio	n me	dium
in some	e regions.							
Organio	c solvents	are r	not ace	ceptal	ble an	d no s	urfac	tants

- should be added.
- Samples should be filtered during collection
- For gelatin capsules or tablets with gelatin coatings where cross-linking has been demonstrated, the use of enzymes may be acceptable, if appropriately justified.

When high variability or coning is observed in the paddle apparatus at 50 rpm, the use of the basket apparatus at 100 rpm is recommended. Additionally, use of sinkers in the paddle apparatus to overcome issues such as coning may be considered with justification.

To qualify for a BCS-based biowaiver for BCS Class I drug substances both the test product and reference product should display either very rapid ( $\geq$ 85 for the mean percent dissolved in  $\leq$ 15 minutes) or rapid ( $\geq$ 85 for the mean percent dissolved in  $\leq$ 30 minutes) and similar in vitro dissolution characteristics under all of the defined conditions. In cases where one product has rapid dissolution and the other has very rapid dissolution, statistical similarity of the profiles should be demonstrated as below.

For the comparison of dissolution profiles, where applicable,	
the similarity factor f2 should be estimated by using the	
following formula:	
$f2 = 50 \bullet \log \{ [1 + (1/n)\Sigma_{t=1}^{n} (R_t - T_t)^2]^{-0.5} \bullet 100 \}$	
In this equation f2 is the similarity factor, n is the number of	
time points, R(t) is the mean percent reference drug	
dissolved at time t after initiation of the study; T(t) is the	
mean percent test drug dissolved at time t after initiation of	
the study.	
The evaluation of the similarity factor is based on the	
following conditions:	
• A minimum of three time points (zero excluded)	
• The time points should be the same for the two	
products	
• Mean of twelve individual values for every time point	
for each product.	
● Not more than one mean value of ≥85% dissolved for	
any of the products.	
• To allow the use of mean data, the coefficient of	
variation should not be more than 20% at early	
time-points (up to 10 minutes), and should not be more	
than 10% at other time points.	
Two dissolution profiles are considered similar when the f2	
value is $\geq$ 50. When both test and reference products	
demonstrate that $\geq$ 85% of the label amount of the drug is	
dissolved in 15 minutes, comparison with an f2 test is	

		unnecessary and the dissolution profiles are considered	
		similar. In case the coefficient of variation is too high, f2	
		calculation is considered not accurate and reliable and a	
		conclusion on similarity in dissolution cannot be made.	
		To qualify for a BCS-based biowaiver for BCS Class III drug	
		substances both the test product and reference product	
		should display very rapid (≥85 for the mean percent	
		dissolved in ≤15 minutes) in vitro dissolution characteristics	
		under the defined conditions.	
		For FDC formulations, dissolution profiles should meet the	
		criteria for all drug substances in the FDC to be considered.	
		For FDC formulations containing only BCS I drugs, criteria	
		regarding dissolution should follow that for a BCS Class I	
		drug. For FDC formulations containing only BCS Class III	
		drugs, criteria regarding dissolution should follow that for a	
		BCS Class III drug. For FDCs containing both BCS Class I and	
		BCS Class III drugs the dissolution criteria for the applicable	
		BCS class for each component should be applied.	
		For products with more than one strength the BCS approach	
		should be applied for each strength, i.e., it is expected that	
		test and reference product dissolution profiles are compared	
		at each strength.	
275-295	DOCUMENTATION	The applicant should provide complete information on the	
		critical quality attributes of the test drug substance and drug	
		product and as much information as possible for the	

reference product, including, but not limited to: polymorphic form and enantiomeric purity; and any information on bioavailability or bioequivalence problems with the drug substance or drug product, including literature surveys and applicant derived studies. All study protocols including standards, quality assurance and testing methods should be appropriately detailed and validated according to current regulatory guidance's and policies.

The reporting format should include tabular and graphical presentations showing individual and mean results and summary statistics. The tabular presentation should include standard deviation and coefficient of variation

The report should include all excipients, their qualitative and, if possible, quantitative differences between the test and reference products

A full description of the analytical methods employed, including validation, e.g. method linearity, accuracy and precision, should be provided. A detailed description of all test methods andmedia, including test and reference batch information [unit dose (milligram and %), batch number, manufacturing date and batch size where known, expiry date, and any comments] should also be provided. The dissolution report should include a thorough description of experimental settings and analytical methods, including information on the dissolution conditions such as apparatus, de-aeration, filtration during sampling, volume, etc.

		In addition, complete information with full description of the
		methods applied should be provided for the Caco-2 cell
		permeability assay method, if applicable (see Annex I).
207 201		
307-391	ANNEX I: Caco-2	Permeability assays employing cultured Caco-2 epithelial cell
	CELL PERMEABILITY	monolayers derived from a human colon adenocarcinoma
	ASSAY METHOD	cell line are widely used to estimate intestinal drug
	CONSIDERATIONS	absorption in humans. Caco-2 cells undergo spontaneous
		morphological and biochemical enterocytic differentiation,
		and express cell polarity with an apical brush border, tight
		intercellular junctions, and several active transporters as in
		the small intestine. Due to a potential for low or absent
		expression of efflux (e.g., P-gp, BCRP, MRP2) and uptake (e.g.,
		PepT1, OATP2B1, MCT1) transporters, the use of Caco-2 cell
		assays in support of high permeability for BCS classification is
		limited to passively transported drugs (for definition see
		Assay Considerations).
		Method validation
		The suitability of the Caco-2 cell assays for BCS permeability
		determination should be demonstrated by establishing a
		rank-order relationship between experimental permeability
		values and the extent of drug absorption in human subjects
		using zero, low (<50%), moderate (50 – 84%), and high
		(≥85%) permeability model drugs. A sufficient number of
		model drugs are recommended for the validation to
		characterize the full permeability range (a minimum 5 for
		each permeability category, high, moderate and low is
		recommended; examples are provided in Table 1). Further, a

sufficient number (minimum of 3) of cell assay replicates should be employed to provide a reliable estimate of drug permeability. The established relationship should permit differentiation between low, moderate and high permeability drugs.

Caco-2 cell monolayer integrity should be confirmed by comparing transepithelial electrical resistance (TEER) measures and/or other suitable indicators, prior to and after an experiment. In addition, cell monolayer integrity should be demonstrated by means of compounds with proven zero permeability.

Reporting of the method validation should include a list of the selected model drugs along with data on extent of absorption in humans (mean, standard deviation, coefficient of variation) used to establish suitability of the method, permeability values for each model drug (mean, standard deviation, coefficient of variation), permeability class of each model drug, and a plot of the extent of absorption as a function of permeability (mean ± standard deviation or 95 percent confidence interval) with identification of the high permeability class boundary and selected high permeability internal standard used to classify the test drug substance.

In addition, a description of the study method, drug concentrations in the donor fluid, description of the analytical method, equation used to calculate permeability, and where appropriate, information on efflux potential, e.g., bidirectional transport data should be provided for a known substrate.

#### Assay considerations

As noted above, the use of Caco-2 cell assays in support of BCS permeability determination is limited to passively transported drugs. A passive transport mechanism can be inferred when the pharmacokinetics of the drug (assessed as AUC and Cmax parameters) are dose proportional over the relevant clinical dose range. Alternatively, the absence of an active transport mechanism may be verified using a suitable assay system that expresses known efflux transporters, e.g., by demonstrating independence of measured in vitro permeability on initial drug concentration, e.g., 0.01, 0.1, and 1 times the highest strength dissolved in 250 ml, or on transport direction (efflux ratio, i.e., ratio of apparent permeability (Papp) between the basolateral-to-apical and apical-to-basolateral directions <2 for the selected drug concentrations).

### Efflux ratio = $P_{appBL \rightarrow AP}/P_{appAP \rightarrow BL}$ .

Functional expression of efflux transporters should be verified by using bidirectional transport studies demonstrating asymmetric permeability of selected efflux transporter substrates, e.g., digoxin, vinblastine, rhodamine 123, at non-saturating concentrations.

The test drug substance concentrations used in the permeability studies should be justified. A validated Caco-2

method used for drug permeability determinations should employ conditions established during the validation, and include a moderate and a high permeability model drug as internal standards to demonstrate consistency of the method, i.e., included in the donor fluid along with the test drug. The choice of internal standards should be based on compatibility with the test drug, i.e., they should not exhibit any significant physical, chemical, or permeation interactions. The permeability of the internal standards may be determined following evaluation of the test drug in the same monolayers or monolayers in the same plate, when it is not feasible to include internal standards in the same cell culture well as the test drug permeability evaluation. The permeability values of the internal standards should be consistent between different tests, including those conducted during method validation. Acceptance criteria should be set for the internal standards and model efflux drug. Mean drug and internal standards recovery at the end of the test should be assessed. For recoveries <80%, a mass balance evaluation should be conducted including measurement of the residual amount of drug in the membrane.

Evaluation of the test drug permeability for BCS classification may be facilitated by selection of a high permeability internal standard with permeability in close proximity to the moderate/high permeability class boundary. The test drug is considered highly permeable when its permeability value is equal to or greater than that of the selected internal

## standard with high permeability.

Information to support high permeability of a test drug substance (mean, standard deviation, coefficient of variation) should include permeability data on the test drug substance, the internal standards, in vitro gastrointestinal stability information, and data supporting passive transport mechanism.

Table 2. Examples of model drugs for permeability assaymethod validation

Group	Drug
High Permeability	Antipyrine
(f <sub>a</sub> ≥85 percent)	Caffeine
	Ketoprofen
	Naproxen
	Theophylline
	Metoprolol
	Propranolol
	Carbamazepine
	Phenytoin
	Disopyramide
	Minoxidil
Moderate Permeability	Chlorpheniramine
(f <sub>a</sub> = 50-84 percent)	Creatinine
	Terbutaline
	Hydrochlorothiazide
	Enalapril

			Furosemide	
			Metformin	
			Amiloride	
			Atenolol	
			Ranitidine	
		Low Permeability	Famotidine	
		(f <sub>a</sub> < 50 percent)	Nadolol	
			Sulpiride	
			Lisinopril	
			Acyclovir	
			Foscarnet	
			Mannitol	
			Chlorothiazide	
			Polyethylene glycol 400	
			Enalaprilat	
		Zero Permeability	FITC-Dextran	
			Polyethylene glycol 4000	
			Lucifer yellow	
			Inulin	
			Lactulose	
		Efflux Substrates	Digoxin	
			Paclitaxel	
			Quinidine	
			Vinblastine	
395-401	ANNEX II: FURTHER	Figure 1. BCS Class I Drug Substances		
	INFORMATION ON			
	THE ASSESSMENT OF			
	EXCIPIENT			

	DIFFERENCES	frequencies is it is in the subscription of the conject in the intervence product of the intervence product of the conject in the intervence product of the conject in the intervence product of the intervence product of the conject in the intervence product of the in		
403-409	EXAMPLES OF	Example 1: BCS Class I Biowaiver		
	ACCEPTABLE	The amount of sorbitol (an excipient that affects absorption		
	DIFFERENCES IN	in the test formulation is different from the reference		
	EXCIPIENTS	formulation. The p	ermitted range is 4	45 mg to 55 mg of
		sorbitol based on the amount in the reference formulation		
		(50 mg + 10.0%)		
		Component	Amount	Amount
			(mg)	(mg) test
			reference	
		Drug substance	100	100

	Microcrystalline	100	95
	cellulose (filler)		
	HPMC (binder)	10	10
	Talc	5	5
	Sorbitol (filler)	50	55
	Total	265	265