

Manuscript Number: IJP-D-20-02035R1

Title: Quality considerations on the pharmaceutical applications of fused deposition modeling 3D printing

Article Type: VSI: 3D printing

Section/Category:

Keywords: 3D printing; fused deposition modeling; drug product fabrication; quality; safety.

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Abstract: 3D printing, and particularly fused deposition modeling (FDM), has rapidly brought the possibility of personalizing drug therapies to the forefront of pharmaceutical research and media attention. Applications for this technology, described in published articles, are expected to grow significantly in 2020. Where are we on this path, and what needs to be done to develop a FDM 2.0 process and make personalized medicines available to patients? Based on literature analysis, this manuscript aims to answer these questions and highlight the critical technical aspects of FDM as an emerging technology for manufacturing safe, high-quality personalized oral drug products. In this collaborative paper, experts from different fields contribute strategies for ensuring the quality of starting materials and discuss the design phase, printer hardware and software, the process, the environment and the resulting products, from the perspectives of both patients and operators.



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Guest Editors
International Journal of Pharmaceutics*

Milan, July 21st 2020

Subject: manuscript submission

Dear Editors,

on behalf of co-authors and following your kind invitation, we are pleased to submit for publication in the Special Issue “Innovations in 2D and 3D printed pharmaceuticals” of International Journal of Pharmaceutics our review article entitled “Quality considerations on the pharmaceutical applications of fused deposition modeling 3D printing” by Alice Melocchi, Francesco Briatico-Vangosa, Marco Uboldi, Federico Parietti, Maximilian Turchi, Didier von Zeppelin, Alessandra Maroni, Lucia Zema, Andrea Gazzaniga, Ahmed Zidan.

The present manuscript, covering over 200 literature references, is the result of a collaborative work involving researchers from academy, industry and regulatory agency (CDER-FDA), who in-depth discuss the critical aspects of 3D printing by fused deposition modeling (FDM) as an emerging technology for manufacturing safe, high-quality personalized drug products. Indeed, 3D printing provided the tool for



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implementing precision medicine, bringing it to the forefront of pharmaceutical research.

In this review article, we made an effort to carry out comprehensive literature analysis of the quality aspects involved by the FDM technique. Sections of the Manuscript were purposely dedicated to the challenges that should be addressed to implement FDM in the fabrication of personalized drug products suitable for oral administration, including geometric design of the dosage form, equipment, raw materials, controls, environment, risks to the operator and regulatory engagement.

Also on behalf of co-authors, we hereby declare that this manuscript is original, has not been published before and is not currently being considered for publication elsewhere, it does not report on any animal or human *in vivo* experiment, there are no known conflicts of interest associated with publication and the contents have been read and approved by all named authors.

Sincerely Yours,

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Quality considerations on the pharmaceutical applications of fused deposition modeling 3D printing

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Guest Editors International Journal of Pharmaceutics

We would like to thank the Reviewers for appreciating our work and providing helpful comments. Please find below a point-by-point outline of how the manuscript has been modified accordingly.

Reviewer #1:

The manuscript is timely and well written. The structure of the review is very good. The vast majority of the references from the groups that are active in the field are covered and are well represented. The authors set the stage with the case for needing precision medicine which can be materialized by means of 3D printing technology.

Then provide a very good discussion for the technological challenges of FDM, regulatory landscape and the potential health risks for the operators. I particularly like the later as it is rather neglected as a topic although of great importance for the health of the operators. As such I have minor comments to make this a more rounded manuscript.

Typo error line 55 'challenges" instead of challanges

Please improve the quality of the figures.

Following the Reviewer's suggestions, we have checked the Manuscript for typos and improved the quality of the Figures by increasing their resolution.

Reviewer #2:

Overall comments:

The manuscript is well-written and provides a comprehensive overview of attempts to prepare 3DP of pharmaceutical dosage forms and characterisation techniques. It also describes some of the limitations and challenges experienced so far and provides suggestions for approaches to overcome these. As such it is suitable for publication however, a number of comments are provided that the authors should consider addressing:

- Line 164 - clarify what is meant by: "extend patency on the drugs involved"

We made an effort to improve the text.

- Lines 166 and 167 - this statement doesn't make sense and further clarification should be provided.

Following the Reviewer's suggestion, we changed the text in order to better clarify the concept.

- Comments on section 1.2 - while Spritam is a 3D printed medicine, it is not considered as a personalised medicine (precision medicine) as all dosage forms prepared during the manufacture contain the same quantity of drug. This should be highlighted by the authors. Rather than being used to prepare a personalised medicine 3DP was leveraged to achieve a niche critical quality attribute (an extremely rapidly disintegration ODT) which meets the requirement of the need to rapidly administer of levetiracetam to epileptic patients suffering from seizures.

We agree with the Reviewer that the description of Spritam as the first 3D printed drug product on the market was neither comprehensive nor effective. We made an effort to include all the suggestions provided in the text.

- Lines 210-212 the authors intimate that photocuring of polymers with UV light would result in difficulty of preparing safe and efficacious dosage forms but do not provide an explanation which should be provided.

We have amended the text in order to improve the relevant clarity.

- Lines 252-253 - the authors should also mention the risk to the physical stability of the API including the polymorphic form; e.g. change in polymorphic form at higher temperature, or formation of an amorphous form which then recrystallises over time. Physical stability of the API is of key importance for OSDs and this should be addressed.

We agree with the Reviewer about the importance of the physical stability of drugs and we have modified the text accordingly.

- Lines 289 - 300 - supply chain and pricing should also be considered - good to see abuse and counterfeiting are mentioned.

The text was implemented following the Reviewer's suggestion.

- Lines 301-302 - In terms of multidisciplinary collaborations, the authors should provide examples of the key disciplines that would be required (e.g. regulatory, pharm sci, manufacturing, analytical, QA, supply chain, community health care professionals)

The text was implemented following the Reviewer's suggestion.

- Lines 403 - is it really fair to say that benchtop 3D FDM printers have reduced the quality of printed objects e.g. by lowering resolution compared to industrial printers? Maybe the initial FDM desktop printers were not producing high quality printed parts but the technology is evolving and desktop printers are improving all the time?

We agree with the Reviewer that FDM printers have improved over time, leading to better quality of the resulting products, at least in terms of physical appearance. However, the improvements achieved are still far away from the characteristics that industrial equipment would be able to provide the final object with, especially with respect to printing reproducibility when small details are involved. By way of example, the Arburg droplet-based deposition process enables fine-control of the pressure on the material within the extruder, the dimensions of each single molten drop to be deposited and the frequency with which these are layered down. We made an effort to highlight progresses undergone over time by desktop 3D printers and emphasize the above mentioned concepts in the text.

- Table 1 - this is a helpful table - the authors could consider adding an additional column indicating how the issues identified could adversely impact the critical quality attributes of the printed dosage form.

We implemented Table 1 with the additional information requested by the Reviewer. This was introduced in the third column, previously entitled as "Issues" and currently named as "Issues and relevant impact on the product".

- Line 440 - "plasticate" is not a real word. Suggest "plasticise" instead?

We amended the text substituting the word plasticate with plasticize.

- Line 443 - the authors state that the Freeformer equipment was developed from Injection Moulding technology, however, the process described does not relate to injection moulding whereby a semi solid or liquid material is injected into a mould and allowed to cool. The authors should highlight and clarify in the manuscript precisely how the Freeformer equipment works differently from an injection moulding process.

Following the Reviewer's comments, we made an effort to highlight and clarify in the text similarities and differences between the working mechanism of the Freeformer equipment and

that of an injection molding press. In particular, we highlighted how the new additive manufacturing process is based on the deposition of droplets directly within the build chamber.

- Table 2. the authors should consider the polymer composition and its propensity to exhibit either thermal expansion or contraction post extrusion - in the table this is more simply described as "must keep their shape". DSC, PXRD and IR are listed in the commentary but should also be included in the table which is quite broad and non-specific. Chemical analysis (e.g. by HPLC) should also be included to confirm assay and related substances are not impacted by the filament forming and/or printing processes.

Following the Reviewer's comment, in Table 2 we clarified what we meant writing that the "deposited layers should keep their shape". Actually, Table 2 was built on purpose around filament thermo-mechanical requirements only, as a comprehensive summary of the latter characteristics was lacking in the literature available. Such a choice was better highlighted in the text introducing the Table itself. For this reason, we preferred to discuss the specific use of DSC, PXRD and IR and chemical analyses in the text of Section 2.3, which was improved in agreement with the Reviewer's comments.

- Line 616 check reference - Goyantes et al 2018 (should be Goyanes et al?)

The Reviewer is right and we corrected the text accordingly.

- Lines 631-634 - the use of mathematical models to predict quality attributes may have some value as a theoretical derisking exercise but analytical testing would be required in order to ensure that the dosage forms manufactured possess the attributes required to support release.

We agree with the Reviewer that analytical testing of the final dosage forms will be always needed to ensure their quality. In this respect, mathematical models can help in decreasing the number of analyses to be performed, especially when dealing with pre-validated products, thus limiting costs and time for batch releasing. We made an effort to improve the clarity of the text and to highlight the merely derisking capabilities of mathematical models.

- Line 648 - generation of a library of critical quality attributes is not required - the critical quality attributes of oral solid dosage forms are already defined and very well understood. The key to the success of 3DP will be identifying the relevant critical process parameters which impact the CQAs and ensuring that these parameters remain within defined ranges which have been agreed with the regulators.

We agree with the Reviewer's comment on critical quality attributes and critical process parameters and we modified the text accordingly.

- Section 2.5 - Environment

In general there is not enough information provided in this section with respect to where 3D printers could be employed to fabricate oral solid dosage forms. There is no business case for constructing new "facilities" for 3DP when GMP manufacturing areas are already well established and 3DP could simply be brought in as an alternative manufacturing process. There is no mention of the doctor's surgery, or community and hospital pharmacies or even the patient's home as alternative locations which would also require separate bespoke solutions for 3DP of medicines.

In this manuscript, we discussed in a critical way the scientific literature available and we presented our point on the future of 3D printing by fused deposition modeling, also hypothesizing where fabrication of personalized medicines will occur. In this respect, we described the environment in which 3D printing of high-quality and safe dosage forms would be desirable to be performed. This was envisaged to be an industrial-like environment characterized by a quality-oriented mindset.

Resorting to compounding/galenical practice and extemporaneous formulations within compounding/hospital pharmacies was initially proposed in the literature as a suitable alternative for regulating 3D printing of personalized drug products. However, this choice would currently result in poor quality control, in view of the limited resources/instrumentations available within these facilities. Moreover, the chance to decentralize printing infrastructures, i.e. availability of printers at home and in small clinics to be operated either by the patients themselves or remotely/in person by healthcare professionals, would raise too many issues not only in terms of quality but also of responsibilities.

From our point of view, 3D printing could be simply brought into GMP manufacturing areas, but these would also need to be improved to fulfill specific safety requirements (e.g. presence of filters dedicated to the 3D printing environment). For this reason, we discussed the possible scenario of more widespread dedicated 3D printing facilities on the territory, thus easing production on demand and distribution of personalized drug products with respect to centralized GMP production sites.

- Section 3 - the authors should mention that appropriate cleaning methods would need to be developed for 3DP in order to ensure that cleaning verification could be completed (in combination with the use of appropriately validated analytical methods) after manufacture of batches of 3DP tablets have been completed. This would be particularly important if the same printer was required to be used to print multiple different formulations with different drug substances. The other points raised are valid and could be managed within a GMP

manufacturing environment. How this would translate to the pharmacy / community setting would be more challenging.

Following the Reviewer's suggestions, we mentioned in the text the need for implementation of purposely-developed cleaning procedures.

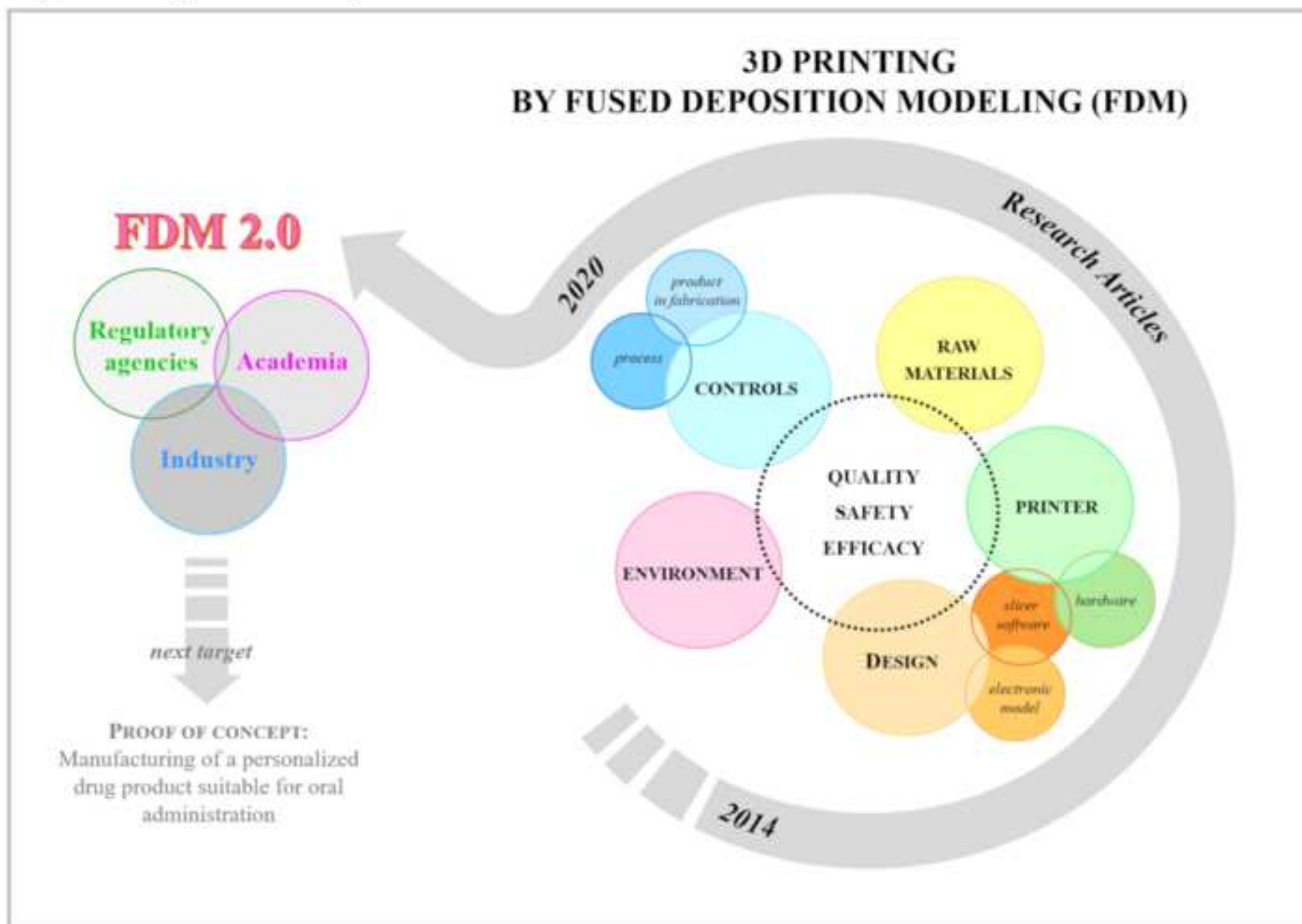
- Lines 779 - 780: "FDA is a member of America Makes and participates in research, standards..." - this sentence does not make sense.

The Reviewer is right and we corrected the sentence.

- Line 806 - the question mark is not needed.

The Reviewer is right and we removed the question mark.

...portrait of the state of the art



1 **Quality considerations on the pharmaceutical applications of fused deposition**
2 **modeling 3D printing**

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4

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20 **DISCLAIMER**

21 This presentation reflects the views of the authors and should not be construed to represent the
22 FDA's views or policies.

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27 **Abstract**

28 3D printing, and particularly fused deposition modeling (FDM), has rapidly brought the possibility
29 of personalizing drug therapies to the forefront of pharmaceutical research and media attention.
30 Applications for this technology, described in published articles, are expected to grow significantly
31 in 2020. Where are we on this path, and what needs to be done to develop a FDM 2.0 process and
32 make personalized medicines available to patients? Based on literature analysis, this manuscript
33 aims to answer these questions and highlight the critical technical aspects of FDM as an emerging
34 technology for manufacturing safe, high-quality personalized oral drug products. In this
35 collaborative paper, experts from different fields contribute strategies for ensuring the quality of
36 starting materials and discuss the design phase, printer hardware and software, the process, the
37 environment and the resulting products, from the perspectives of both patients and operators.

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39 **Keywords:** 3D printing, fused deposition modeling, drug product fabrication, quality, safety.

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72 **1. Introduction**

73 **1.1 Overview of 3D printing through 2020**

74 3D printing began officially in 1984, with the approval of the first stereolithography patent (Hull,
75 1986). However, this technology did not achieve widespread adoption for more than 10 years, as its
76 use was limited by numerous other patents
77 (https://www.wipo.int/edocs/pubdocs/en/wipo_pub_944_2015.pdf). Only after the patents'
78 expiration did desktop 3D printers become easily available on the market, resulting in the birth of
79 the consumer 3D printing community. Thereafter, the 3D printing industry, encompassing not only
80 companies employing printers but also those building them, grew very quickly. It is likely to reach a
81 market size of more than \$17 B in 2020 and is expected to increase to \$34.8 B by 2024
82 ([https://www2.deloitte.com/content/dam/Deloitte/de/Documents/operations/Deloitte_Challenges_of](https://www2.deloitte.com/content/dam/Deloitte/de/Documents/operations/Deloitte_Challenges_of_Additive_Manufacturing.pdf)
83 [_Additive_Manufacturing.pdf](https://downloads.3dhubs.com/3D_printing_trends_report_2020.pdf); https://downloads.3dhubs.com/3D_printing_trends_report_2020.pdf;
84 <https://www.grandviewresearch.com/industry-analysis/3d-printing-industry-analysis>;
85 <https://www.marketsandmarkets.com/Market-Reports/3d-printing-market-1276.html>;
86 <https://www.marketresearch.com/Expeditious-Research-v4071/3D-Printing-Outlook-9903905/>).

87 This expected continuous growth spurred venture capital funding of 3D printing-related startups,
88 which exceeded \$300 M in 2019.

89 In its evolution, 3D printing has shifted from being considered just a prototyping tool, to being
90 employed as the additive manufacturing (AM) method of choice for low-volume batches of high-
91 value products. For such products, the upfront investment in tooling required by subtractive
92 methods would not be cost-effective (Ford and Despeisse, 2016;
93 <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.1176.pdf>). Moreover, novel
94 interesting applications have been identified. These include printing of metals and electronics to
95 reduce assembly time and human labor in the manufacturing of sensors; generative design in the
96 fields of art, architecture, communication and product design (*i.e.*, a fast method to explore design

97 possibilities providing physical prototypes to simplify visualization); and 4D printing (*i.e.*, the
98 fabrication of objects capable of changing their shape in response to an external non-mechanical
99 stimulus) (Lukin et al., 2019; Maroni et al., 2019; Mehrpouya et al., 2019; Melocchi et al., 2019a;
100 Savolainen et al., 2020; Trenfield et al., 2019a).

101 Given the improvement of 3D printing and the widespread awareness that it can help connect
102 marginalized and difficult-to-reach populations with essential products, several industries (including
103 automotive, defense and healthcare) have begun to experience 3D printing-related production,
104 business and supply-chain transformations (Chan et al., 2018; Despeisse et al., 2017; Ghobadian et
105 al., 2020). In this respect, the percentage of companies using AM for specific production purposes
106 increased from 24% to 65% in 2019 ([https://assets.ey.com/content/dam/ey-sites/ey-](https://assets.ey.com/content/dam/ey-sites/ey-com/en_gl/topics/advisory/ey-3d-printing-game-changer.pdf)
107 [com/en_gl/topics/advisory/ey-3d-printing-game-changer.pdf](https://assets.ey.com/content/dam/ey-sites/ey-com/en_gl/topics/advisory/ey-3d-printing-game-changer.pdf);
108 [https://cdn2.hubspot.net/hubfs/5154612/downloads/Sculpteo_The%20State%20of%203D%20Printi](https://cdn2.hubspot.net/hubfs/5154612/downloads/Sculpteo_The%20State%20of%203D%20Printing_2019.pdf)
109 [ng_2019.pdf](https://cdn2.hubspot.net/hubfs/5154612/downloads/Sculpteo_The%20State%20of%203D%20Printing_2019.pdf)). At the same time, the news media started to pay great attention to 3D printing and to
110 incorporate it into the concepts of the fourth industrial revolution and a new manufacturing
111 renaissance (Baines et al., 2019; Berman, 2012; Garret 2014; Prince, 2014).

112 Despite the initial enthusiasm about 3D printing technology, its actual application potential in
113 different industries is only now beginning to be tested in depth (Achillas et al., 2015; Anton et al.,
114 2014; Bogers et al., 2016; Culot et al., 2019; Garmulewicz et al., 2018; Huang et al., 2013; Kleer et
115 al., 2019; Mir and Nakamura, 2017; Petrick and Simpson, 2013; Rehnberg and Ponte, 2016; Tran
116 2017; Yao and Lin, 2015). In particular, due to a few technological bottlenecks such as production
117 speed, as well as cost and labor associated with pre- and post-printing operations, 3D printing
118 currently is filling a niche as a complement to other existing manufacturing processes. In this
119 context, the unique capabilities of 3D printing in terms of on-demand and delocalized production,
120 product customization and realization of complex designs might find their full application.

121

122 **1.2. 3D printing for precision medicine**

123 In parallel with the increasing attention to 3D printing in many different areas, scientists have been
124 investigating its suitability for the manufacturing of drug products enabling precision medicine, for
125 the treatment of subpopulations with specific needs even of a single patient (*i.e.* personalized drug
126 products) (Alhnan et al., 2016; Economidou et al., 2018; Jamróz et al., 2018a; Kjar and Huang,
127 2019; Musazzi et al., 2020; Trenfield et al., 2018a, b; Zhang et al., 2018). Indeed, the concept of
128 precision medicine, an emerging approach regarding treatment and prevention of illness that
129 accounts for each individual's genes, environment and lifestyle, is completely transforming the
130 healthcare field (Collins et al., 2016; <https://ghr.nlm.nih.gov/primer/precisionmedicine/definition>;
131 [https://www.fda.gov/drugs/precision-dosing-defining-need-and-approaches-deliver-individualized-](https://www.fda.gov/drugs/precision-dosing-defining-need-and-approaches-deliver-individualized-drug-dosing-real-world-setting)
132 [drug-dosing-real-world-setting](https://www.fda.gov/Drugs/NewsEvents/ucm132703.htm); <https://www.fda.gov/Drugs/NewsEvents/ucm132703.htm>;
133 Lamichhane et al., 2019; Mirza and Iqbal, 2018; Rahman et al., 2018). For instance, the importance
134 of genomics has been highlighted in clinical decision making and for identifying optimal
135 pharmacological treatments (Alomari et al., 2015; Kaae et al., 2018; Menditto et al., 2020;
136 Radhakrishnan et al., 2020). However, an unmet need exists in the caring cycle for drug products
137 tailored to the variables identified as crucial for a specific subject. In this respect, 3D printing is
138 described as one of the most cost-effective alternatives for moving from mass production (*i.e.*, a
139 one-size-fits-all approach) to fabrication of small batches that are not all the same (Aquino et al.,
140 2018; Awad et al., 2018; Chandekar et al., 2019; Fastø et al., 2019; Goole and Amighi, 2016;
141 Goyanes et al., 2017; Kjar and Huang, 2019; Liang et al., 2019). Indeed, 3D printing would enable:
142 *i*) personalization of the amount of active ingredient in a drug product, *ii*) achievement of high drug
143 loads, *iii*) co-administration of drugs in the same dosage form, *iv*) avoidance of the use of specific
144 excipients in cases of intolerance, *v*) modulation of the release kinetics of drugs, and *vi*) definition
145 of the flavor and other aspects of drug products in order to improve patient compliance, for instance
146 favoring swallowability, especially from a psychological point of view. Adjustments and
147 modifications needed would be made possible by real-time changes in the digital models of

148 products and process parameters (*e.g.*, number of shells, infill percentage, layer overlap), as
149 discussed extensively in the recent literature (Trenfield et al., 2018a, b, 2019; Joo et al., 2020;
150 Norman et al., 2017; Zema et al., 2017). A new and exciting possibility with AM is the
151 manufacturing of medicines on demand and at the point of care, thus removing the need for long-
152 term storage and stability studies. In addition, 3D printing can easily be adapted to fulfill the need
153 for continuous manufacturing, taking advantage of the limited space required to set up a production
154 facility (Cunha-Filho et al., 2017; Desai et al., 2017; Mascia et al., 2013; Melocchi et al., 2015a;
155 Puri et al., 2017; Zhang et al., 2017a). In this respect, it may be possible to implement an innovative
156 AM-based approach to larger-scale production.

157 The availability of customized drug products not only would decrease healthcare system expenses
158 associated with side effects and hospitalization, but it also may be of utmost importance for patients
159 with special needs (Norman et al., 2017; Hsiao et al., 2018). These patients include, in particular,
160 those affected by rare diseases, children, the elderly, the poor or the high metabolizers, individuals
161 with illnesses affecting elimination organs and people taking multiple medicines. Indeed,
162 concomitant use of numerous prescription drugs, or polypharmacy, has largely increased in recent
163 years. **Combination products, in addition to enhancing patient adherence, also have the potential to**
164 **extend commercial interest in specific drug molecules after the expiration of the relevant patents**
165 **and improve cost-effectiveness by creating a single product pipeline. This would reduce the costs**
166 **associated with packaging, prescribing and dispensing. Moreover, the design versatility of 3D**
167 **printed products makes it possible to formulate non-compatible molecules within separated**
168 **compartments of the same dosage unit.**

169 Finally, 3D printing may become an effective tool in the near future for developing telemedicine
170 (Araújo et al., 2019; Johnson and Brownlee, 2018; Wang and Kricka, 2018; Wen, 2017). This is
171 defined as the remote delivery of healthcare services (*i.e.*, consultation, diagnosis, intervention,
172 monitoring and education) by taking advantage of communication technologies whenever
173 physicians and patients are not physically close. Telemedicine could advantageously be integrated

174 with other technological advancements, such as smart health monitors, mobile applications and
175 cloud-based computing, which would allow physicians to evaluate patient health in real-time and to
176 collect any data about modifications of the status quo. Telemedicine could also provide a tool to
177 enable the adjustment of the pharmacological treatment when needed. In this respect, an FDM
178 printer, supplied with the necessary raw materials and remotely controlled, may become a crucial
179 element in making home therapy possible.

180 Despite the great potential for 3D printing to change current treatment strategies, one 3D-printed
181 drug product is on the market, *i.e.* Spritam. It consists of fast-dissolving tablets containing
182 levetiracetam, manufactured by the binder jetting technology initially developed in the late 1980s in
183 the labs of the Massachusetts Institute of Technology and then fully redesigned by Aprelia
184 Pharmaceuticals (Alhnan et al., 2016; <https://www.spritam.com/#/hcp/zipdose-technology/what-is-zipdose-technology>). This 3D printing technique was selected to give a specific quality attribute to
185 the product, *i.e.* an extremely rapid disintegration, which increases the dissolution rate and improves
186 the bioavailability of the drug, enabling better treatment of epileptic patients suffering from
187 seizures. Although Spritam is available on the market in few different dosages, all the units
188 belonging to a single batch contain the same drug strength. Therefore, it may not be considered a
189 personalized medicine. Indeed, it was approved by the U.S. Food and Drug Administration (FDA)
190 in 2015 through a traditional regulatory pathway, after years of research aimed at making the
191 technology suitable for mass manufacturing (Goole and Amighi, 2016; Boudriau et al., 2016; Preis
192 and Öblom, 2017). Some of the challenges of producing 3D-printed personalized drug products
193 include difficulties in generating real-world evidence during the new drug development process to
194 support precision dosing and the application of individualized dosing regimens in clinical practice.
195 In addition, a specific regulatory framework for assessing the quality and safety of personalized
196 medicine is lacking. Indeed, the conventional approach of quality assurance would hardly apply in
197 this respect (Khairuzzaman, 2018). For example, quality controls (*e.g.*, content uniformity, weight
198 uniformity, dissolution rate) established in traditional manufacturing based on sampling units from
199

200 each batch and evaluating them for critical parameters, while retaining at least twice the quantity
201 necessary to perform all the required tests, would be difficult to apply to personalized products. In
202 this case, the result would be numerous batches, each consisting of a few units and each differing
203 from the others. Therefore, new strategies to ensure quality of the starting materials, robustness of
204 the printing process, and specification of finished product should be developed by the
205 pharmaceutical industry and assessed by regulators for suitability. In this context, newly-on-the-
206 market startups involved in the manufacturing of 3D printed products could play a pivotal role
207 because they benefit from greater flexibility, cutting-edge approaches and an application-specific
208 focus.

209 In recent years, the research community has focused their interest on investigating the feasibility of
210 3D printing in manufacturing a range of customizable dosage forms and drug delivery systems
211 (DDSs). They considered not only binder jetting, but also extrusion printing, encompassing gel
212 deposition and fused deposition modeling (FDM), selective laser sintering and stereolithography
213 techniques. Among those technologies, the last probably was the most challenging, as evidenced by
214 the limited number of applications proposed in the scientific literature. **This could be associated
215 with the need for using photosensitive polymers, which have to be cured upon irradiation with UV
216 light, to build up the item structure layer by layer. The polymers currently used for this process are
217 smelly and potentially toxic, which would hardly fulfill the safety and quality requirements of drug
218 products.**

219 Based on the analyses of the scientific literature published so far, FDM was found to be the most
220 studied 3D printing technique (Lamichhane et al., 2019; Gioumouxouzis et al., 2019). Indeed, the
221 number of research articles increased from fewer than five in 2014 to almost forty in 2019, with a
222 growth trend confirmed for 2020 and an evident focus on the oral route of administration (Figure 1).
223 This phenomenon could be explained by the similarity of FDM to other hot processing techniques
224 already known in the pharmaceutical industry, for example hot melt extrusion (HME), and the
225 possibility of using thermoplastic polymers commonly employed in the formulation of drug

226 products (Norman et al., 2017; Thakkar et al., 2020; Zema et al., 2012, 2017). Moreover, the cost-
227 accessibility of desktop FDM equipment and the possibility of modifying it were key factors
228 favoring its adoption. Analyzing the available scientific literature, in the following sections we
229 made an effort in this critical overview to highlight all aspects that should be addressed before
230 implementing FDM in the fabrication of personalized drug products for human use, which could
231 correspond with the beginning of a new FDM era we named FDM 2.0. Notably, we purposely
232 focused solely on the oral route, which allows us to circumvent at least those issues associated with
233 sterility.

234

235 **2. Technology implementation challenges of FDM**

236 The FDM process involves deposition of softened/molten material layers that are fused together in a
237 controlled pattern to create a 3D object, following its digital model. The material is generally fed
238 into the FDM equipment in the form of a filament, with defined size and thermo-mechanical
239 characteristics, fabricated by HME starting from a thermoplastic polymer (Araújo et al., 2019; Aho
240 et al., 2019; Azad et al., 2020; Long et al., 2017; Palo et al., 2017; Konta et al., 2017; Zema et al.,
241 2017). The filament is then heated in the 3D printer and extruded onto the build plate through the
242 nozzle. Objects produced by FDM are generally characterized by good mechanical resistance,
243 except for highly porous structures that may be friable. On the other hand, surface smoothness often
244 needs to be enhanced eventually through post-processing operations, as the layer deposition pattern
245 often can be evident and might affect user compliance. Resolution of details also can be an issue,
246 particularly when these are geometric features critical to the printed item's performance (*e.g.*,
247 thickness of a release-modifying coating layer, overlapping parts of capsule closure).

248 According to the analyzed literature, FDM was initially investigated for its intrinsic suitability for
249 low-volume production of traditional orally-administered dosage forms such as tablets, capsules and
250 matrices). This was translated to the fabrication of personalized medicines (Algahtani et al., 2018;

251 Awad et al., 2018; Cunha-Filho et al., 2017; Tan et al., 2018). In this respect, the main advantages
252 of FDM resemble those already identified for other hot-processing techniques, such as the lack of
253 solvents, which both reduces overall time and cost of the manufacturing process and is beneficial to
254 product stability (Zema et al., 2017). Moreover, the operating temperatures limit microbial
255 contamination and promote drug-polymer interaction with the formation of solid dispersions,
256 possibly leading to better bioavailability of the active pharmaceutical ingredient (API).

257 **On the other hand, temperature could impact the chemical as well as physical stability of drug and**
258 **excipients, leading for instance to changes in the solid state. As a consequence, the finished item**
259 **itself could be affected by the presence of byproducts, shrinkage/warpage and recrystallization**
260 **phenomena.** In a narrow and more advanced set of applications, FDM also was tested as a rapid
261 prototyping tool with respect to other processes that are more suitable for mass manufacturing, for
262 example injection molding (IM) (Melocchi et al., 2015b; Maroni et al., 2017; Shin et al., 2019).
263 Currently, FDM is undergoing a reevaluation for the fabrication of DDSs with increasing design
264 complexity (*e.g.*, coated, hollow, pierced, multilayered and with gradient composition) and
265 performance (*e.g.*, combined-release kinetics, shape memory response), using the same equipment,
266 possibly in a single production step (Genina et al., 2017; Joo et al., 2020; Matijašić et al., 2019a;
267 Melocchi et al., 2020a,b). Indeed, this would hardly be achievable by employing other production
268 methods. In addition, some of the new proposed systems target either novel or uncommon
269 therapeutic needs (*e.g.*, microneedles for transdermal drug delivery, biodegradable prolonged-
270 release projectiles for administration of contraceptives to wildlife) as well as administration routes
271 (*e.g.*, topical, vaginal, rectal, intraauricular, intragastric and intravesical) (Fu et al., 2018; Liang et
272 al., 2018; Lim et al., 2018; Long et al., 2018; Luzuriaga et al., 2018; Melocchi et al., 2019b; Tagami
273 et al., 2019).

274 Extemporaneous 3D printing by FDM within pharmacies was initially described in the scientific
275 literature as a way to make personalized drug products available (Araújo et al., 2019; Jamróz et al.,
276 2018a; Lind et al., 2016; Prasad and Smyth, 2016; Rautamo et al., 2020)]. In this environment,

277 FDM would increase not only the variety of products that could be prepared (*e.g.*, controlled-release
278 DDSs), but also their reproducibility, thanks to the intrinsic automation of the 3D printing process.
279 This approach was proposed as it could in principle take advantage of *i)* the presence of educated
280 staff, *ii)* the already-regulated possibility of preparing extemporaneous medicines tailored to single
281 patients, and *iii)* the well-established system for dispensing drug products. However, it could result
282 in poor quality control for these more complex finished products, in view of the limited
283 resources/instrumentations available within compounding and hospital pharmacies.

284 On the other hand, the chance to decentralize printing infrastructures (*i.e.*, the availability of printers
285 to fabricate medications at home and in small clinics; these printers would be operated either by the
286 patients themselves or remotely/in person by healthcare professionals other than pharmacists) might
287 not be feasible, as it would raise issues not only of quality but also of responsibility (Trenfield et al.,
288 2018a). Currently, such issues can be better addressed in an industrial-like environment, which
289 generally is characterized by a quality-oriented mindset. By way of example, this results in, the
290 enforcement of standard operating procedures, the presence of trained and continuously updated
291 personnel, the possibility of performing an increased number and a wider range of quality control
292 tests. However, even considering this approach to the production of personalized pharmaceuticals,
293 concerns about differing social and/or regulatory impact and relevant questions remain that need to
294 be answered, such as the following (Mirza and Iqbal, 2018; Kaae et al., 2018; Awad et al., 2018;
295 Preis and Öblom, 2017):

296 *i)* Should all patients have access to personalized products, or should they be available only to
297 people with identified special needs?

298 *ii)* If the 3D printing of drug products were to be implemented within a pharmacy, would this
299 be an optional or a mandatory service?

300 *iii)* In the case of at-home printing, what would happen if patients were to unintentionally print
301 in a wrong way, or if they decided to print too many drug products for selling/abuse
302 purposes?

303 iv) How could counterfeiting issues be prevented? How supply chain and pricing topics may be
304 addressed?

305 v) Who would be responsible for the finished product quality and its evaluation?

306 vi) In the case of combination products, how would manufacturers address side effects possibly
307 related to a combination of multiple active ingredients that either were not previously in the
308 same product or have been combined, but in different doses?

309 To find solutions, increasing awareness of these issues among experts in different domains (e.g.
310 pharmaceutical technology, process engineering, quality control, regulatory affairs, supply chain
311 and public health) and establishing relevant multidisciplinary collaborations may be necessary.

312 Quality, regardless of where the personalized product ultimately is manufactured, is of paramount
313 importance, both from patients' and operators' perspectives. In this respect, control of all the
314 variables involved in the fabrication of drug products by FDM will play a pivotal role (Figure 2).
315 Indeed, the quality of the final product will depend on the design phase of the dosage form, slicing
316 parameters, starting materials and software settings, as well as mechanical performance achievable
317 by the printers and on the environmental conditions at the production site. Based on these
318 considerations, all abovementioned aspects will be discussed in depth in the following sections.

319

320 **2.1. Geometric design of the product**

321 Product design and all iterations needed to fabricate customized medicines should be carried out
322 through an appropriate computer aided design (CAD) suite enabling the 3D representation of
323 objects in a file format, which can then be transformed into instructions for the printer (i.e., .stl file)
324 (Zhang et al., 2018; Heikkinen et al., 2018; Junk and Kuen, 2016). Currently, a large variety of
325 commercial and non-commercial CAD systems with a range of licensing features and computing
326 requirements are available. The selection of the CAD software generally is a trade-off between ease
327 of use (i.e. easy and intuitive operability) and scope of function (i.e., range of available geometric

328 features and the possibility of modifying them afterwards). Most high-performance CAD systems
329 also allow simulations, enabling the reduction of prototyping needs and physical testing costs by
330 identifying and correcting possible issues during the core design phase. Some of these software
331 suites are tailored for use in specific fields, such as automotive and aerospace (Cicconi et al., 2018;
332 Hirz et al., 2017). However, users need to complete comprehensive training and accumulate years
333 of experience before being able to fully benefit from and master all of the functionalities (Chester,
334 2007; Ye et al., 2004). Actual printing then requires a .stl file, generally written in a binary format,
335 which specifies the x, y and z coordinates of the vertices of the triangular elements adapted to
336 approximate the surface of the object in the so-called tessellation process (Adhikary and
337 Gurumoorthy, 2018; Leong et al., 1996a,b; Liu et al., 2009; Livesu et al., 2017; Ma et al., 2001;
338 Manmadhachary et al., 2016; Ryppl and Bittnar, 2006). Notably, the more detailed and complex the
339 digital model, and the higher the accuracy sought for fabrication, the more triangular elements the
340 program will use to create its representation. The main advantages associated with the .stl file are its
341 simplicity and independence from the 3D software and the AM process employed. For many
342 shapes, this file format can provide an effective and accurate model.

343 This approach, however, is very limited in the functionality it supports. For example, duplicating
344 vertices and edges results in a high degree of redundancy. In the case of electronic models with
345 smooth curves, thousands of triangles may be required to represent the shapes with sufficient
346 accuracy/precision. Moreover, complex geometries, as for example pierced or encompassing hollow
347 parts, often have led to defective .stl files that are time-consuming to fix. Similarly, the tessellation
348 process can be challenging, leading to the formation of gaps and holes in the cross-sections of the
349 model, which impair the deposition of continuous layers. Many repair tools have been developed to
350 improve the generation of .stl files and reduce errors, although their use always entails a trial-and-
351 error approach.

352 Finally, the file encoding the entire surface geometry of the object is processed by slicer software to
353 convert the model into a series of thin layers and produce the associated G-code, *i.e.*, a series of

354 instructions written in a numerical control programming language that should, in principle, be
355 tailored to a specific printer (Leong et al., 1996a,b). Indeed, the FDM equipment follows the G-code
356 to fabricate successive layers of material and additively build the item through a series of cross-
357 sections from the CAD model. Currently, a variety of available slicing tools, both open-source and
358 proprietary, are available. Evaluating their advantages and disadvantages when used with specific
359 equipment and materials is ongoing in the desktop 3D printing community. Such an approach also
360 would be worth implementing in the pharmaceutical field, considering the possible impact of the
361 thermomechanical characteristics of the formulation on the selection of slicing parameters.

362

363 **2.2 FDM equipment**

364 FDM printers, like any other machine used in pharmaceutical manufacturing, should comply with
365 current good manufacturing practices (cGMP)
366 (<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=211>). Indeed,
367 as per CFR 21 Part 211 Section 211.63 “equipment used in the manufacturing, processing, packing,
368 or holding of a drug product shall be of appropriate design, adequate size, and suitably located to
369 facilitate operations for its intended use and for its cleaning and maintenance.” Moreover, these
370 machines should be built so that the surfaces that contact components, in-process materials, or
371 finished products should not be reactive, additive or absorptive so as to alter the safety, identity,
372 strength, quality or purity of the drug product beyond the official or other established requirements.
373 Currently, commercially available 3D printers, which generally are those used in research
374 applications, hardly meet the cGMP regulations, and thus may render the 3D printed drug products
375 unsafe for human consumption. Consequently, a limited number of publications have focused on
376 the *in vivo* performance of 3D printed medicines, mainly on those orally administered (Arafat et al.,
377 2018; Charoenying et al., 2020; Genina et al., 2017; Goyanes et al., 2018; Scoutaris et al., 2018;
378 Shin et al., 2019). To overcome such limitations, preliminary attempts to attain equipment

379 compliance recently have been described (Araújo et al., 2019;
380 https://www.fabrx.co.uk/technologies/?utm_term=0_13f427b78b-78b91812b1-41694769; Melocchi
381 et al., 2018). Many involved with 3D printing of medicines are still developing their knowledge
382 base on this topic. Most manufacturers that currently design and build 3D printers have relatively
383 limited experience in pharmaceutical manufacturing and need to deepen their knowledge of specific
384 strategies in this area (Lamichhane et al., 2019)]. Collaboration among engineers with different
385 backgrounds, overseen by regulators, could be helpful in this regard.

386 The quality of a final product depends not only on the printing settings but also on the ability of the
387 printer to execute them consistently so that both software and hardware play pivotal roles (Livesu et
388 al., 2017; Feuerbach et al., 2018; Roberson et al., 2013; Šljivic et al., 2019). As was mentioned
389 previously, slicers are responsible for the conversion of the electronic model of the object into
390 elaborated G-code, which serves as instructions for the printer. The latest software suites have setup
391 configurations dedicated to specific printers and can manage many parameters independently,
392 enabling the tuning of many details of the printing process in a way that determines the printing
393 time and the quality of the finished product. Validation of the software *per* the Part 11 and 21 CFR
394 211.68 would also be key components of meeting the CGMPs requirements
395 (<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?fr=211.68>;
396 <https://www.fda.gov/media/75414/download>). Although developing new slicer software could make
397 it possible to precisely set an even larger variety of parameters, the real limiting step is in the ability
398 of the hardware to precisely execute the settings. In fact, the construction materials, the geometry of
399 different parts and their assembly (including engineering design and tolerance stacks), are
400 responsible for the precision of the response of the FDM machines to software commands. In this
401 respect, there are important differences between printers specifically developed for industrial
402 production and desktop printers for customer use. The former initially were developed in the field
403 of plastics manufacturing as a powerful alternative to IM presses, enabling the fabrication of
404 complicated geometries while maintaining repeatable quality. For these reasons, they were designed

405 from scratch to guarantee a certain level of performance, mainly working with high-quality
406 materials and proprietary closed-source software. These characteristics are impediments to the
407 operator's ability to make adjustment and also make the equipment very expensive and strictly
408 related to specific applications, both in terms of materials employed and its scope of use.

409 As a result of these limitations, desktop FDM printers have drawn a lot of interest. They were
410 derived from the industrial printers by simplifying both the hardware; for instance, in their structure,
411 materials and the internal electronics, with the main objective of making them much more
412 economical. Simplification of the hardware, however, caused a loss of mechanical performance,
413 decreasing the tolerances and lowering the resolution of the objects printed. Initially, such a
414 reduction in the FDM outcome was not considered a big limitation by the consumer community
415 compared to the possibility of making the technology more affordable, and thus available to a wider
416 variety of users. Indeed, the cost reduction played a key role in the widespread adoption of FDM
417 technology, encouraging consumers to also be developers of new materials and products, including
418 pharmaceuticals. Notably, the growing interest in personalized medicine, coupled with the low cost
419 of desktop equipment, created fertile ground for the realization of FDM's potential. However, after
420 a promising initial exploration phase, the limitations became more evident. **In this respect, the main
421 issues were associated with the degree of resolution and with the reproducibility of the printing
422 process itself, especially when small details were involved. Being aware of these challenges,
423 different companies tried to improve their desktop 3D printers in the more recent years, thus
424 providing the users with relatively better-performing equipment at limited costs.**

425 The requirements for final products are currently pushing standard desktop printers to their limits,
426 demonstrating the drawbacks of the cheaper equipment in meeting the needs of pharmaceutical
427 manufacturing. In fact, when dealing with DDSs, tolerances of tenths/hundreds of microns become
428 crucial to product performance over time (Melocchi et al., 2020a). Some important restrictions need
429 to be addressed in view of the low-budget printer hardware's poor mechanical precision; for
430 instance, by identifying their true achievement potential for a piece of equipment, *i.e.*, the ratio of a

431 nominal software setting to the real output value. Table 1 is a matrix of the core parts of commercial
432 desktop FDM equipment, analyzing their features, issues and possible improvements/insights.

Table 1: Function, features, issues and possible improvements/insights relevant to core parts of the FDM equipment currently in use.

| | FUNCTION | FEATURES | ISSUES | IMPROVEMENTS/INSIGHTS |
|----------------|--|---|--|--|
| | | | AND RELEVANT IMPACT ON THE PRODUCT | |
| CHASSIS | <ul style="list-style-type: none"> - Holds the equipment - Determines the shape of the printing chamber - Locates the electric motors and control electronics - Acts as a guide for all the moving parts | <ul style="list-style-type: none"> - Consists of extruded bars of round section made of basic steel (balance between cost, resistance, straightness and weight) <i>Equipment examples:</i> makerbot replicator ii, prusa i3, duplicator i3, ultimaker - Comprises coupling parts with high tolerances <i>Equipment examples:</i> Makerbot replicator II (<i>e.g.</i> The building plate position is set manually by screws and springs) | <ul style="list-style-type: none"> - Vibrations, deflections and oscillations during the nozzle/printing head movements | <ul style="list-style-type: none"> - Using more rigid and expensive material (<i>e.g.</i> Grounded tempered steel) - Implementing an isolated, heated and closed chamber to stabilize the conditions of the printing area <i>Equipment examples:</i> Kloner twin, DaVinci series |
| | | | <ul style="list-style-type: none"> - Loss of uniformity of deposited layers, impacting on <ul style="list-style-type: none"> - adherence to the electronic model in terms of dimension - mechanical properties - uniformity of composition | |
| | | | <ul style="list-style-type: none"> - Unstable printing conditions due to absence of isolation from the external environment - Variation in the rheological properties of the material to be deposited impacting on <ul style="list-style-type: none"> - uniformity of deposited layers - solid state of the formulation components - chemical stability with the formation of byproducts (<i>e.g.</i> depolymerization, carbonization, degradation) - physical stability (<i>e.g.</i> shrinking, cracking, deflection, fragility, layer detaching) | |

| | | | | |
|--------------|--|---|--|---|
| MOVING PARTS | <ul style="list-style-type: none"> - Stepper motors connected to a single endless screw for the movement in the z axis - Stepper motors connected to pulley-belt transmission for the movement on x and y axes <i>Equipment examples:</i> Ninjabot, Zmorph, UP plus, Makerbot replicator <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> - Stepper motors connected to belts and brackets for the movement on x, y and z axes <i>Equipment examples:</i> Kloner twin, Delta wasp | <ul style="list-style-type: none"> - Rigidity and straightness - Presence of intermediate parts <ul style="list-style-type: none"> - Mechanical connections to convert force in the actual x- and y-axis translation (belt-mediated transmission) - A single mechanical connection coupling moving parts to only one end of the endless screw <i>Equipment examples:</i> Printrbot simple metal, Lulzbot taz | <ul style="list-style-type: none"> - High tolerances in coupling between transmission components and loose connections - Deviations between the pulling value given by the code and the actual movement of the parts - Oscillations - Non-linear loss of force in the translation of the endless screw movement <div style="background-color: #f0f0f0; padding: 5px;"> <ul style="list-style-type: none"> - Loss of uniformity of deposited layers, impacting on <ul style="list-style-type: none"> - adherence to the electronic model in terms of dimension - mechanical properties - uniformity of composition </div> <ul style="list-style-type: none"> - Uncontrolled cooling of the material due to ventilation phenomena <div style="background-color: #f0f0f0; padding: 5px;"> <ul style="list-style-type: none"> - Variation in the rheological properties of the material to be deposited impacting on <ul style="list-style-type: none"> - uniformity of deposited layers - solid state of the formulation components - formation of byproducts - stability (e.g. shrinking, cracking, deflection, fragility, layer detaching) </div> | <ul style="list-style-type: none"> - Improving assembly including tighter tolerances - Reducing number of intermediate parts - Using double joints on the two ends of the endless screw - Using backlash for the mechanical connection between the screw and the arm - Limiting as much as possible the reciprocal motion of the parts - Implementing an isolated, heated and closed chamber to stabilize the conditions of the printing area |
| | ELECTRONICS | <ul style="list-style-type: none"> - Regulate movements and temperature | <ul style="list-style-type: none"> - Low-performance and low-budget electronics | <ul style="list-style-type: none"> - Instability in temperature control |

| | | | | |
|---------------|---|--|--|---|
| | | | <ul style="list-style-type: none"> - Variation in the rheological properties of the material to be deposited impacting on <ul style="list-style-type: none"> - uniformity of deposited layers (e.g. due to nozzle clogging and filament erosion/sticking to the gear) - solid state of the formulation components - formation of byproducts - stability (e.g. shrinking, cracking, deflection, fragility, layer detaching) | |
| | | | <ul style="list-style-type: none"> - Oscillation in positioning of the moving elements | |
| | | | <ul style="list-style-type: none"> - Loss of uniformity of deposited layers, impacting on <ul style="list-style-type: none"> - adherence to the electronic model in terms of dimension - mechanical properties - uniformity of composition | |
| PRINTING HEAD | <ul style="list-style-type: none"> - Extrusion of the material | <ul style="list-style-type: none"> - Composed of: <ul style="list-style-type: none"> - Heating block, containing thermal resistor for increasing the temperature and thermocouple for temperature control; - Nozzle, <i>i.e.</i> A metallic channel composed of <ul style="list-style-type: none"> - A steel or aluminum cold end, where the filament is gripped by a gear placed on a motor and | <ul style="list-style-type: none"> - Gears with limited ability to generate pressure and to force the material through the nozzle - Loss of uniformity of deposited layers, impacting on <ul style="list-style-type: none"> - adherence to the electronic model in terms of dimension - mechanical properties - uniformity of composition - Variable and uncontrollable thermal exchange | <ul style="list-style-type: none"> - Using custom-designed parts - Using compatible materials (in terms of thermal exchange) for interconnected parts - Improving the feeding mechanism to allow the generation of greater pressures |

| | | | | |
|--|--|--|--|--|
| | | <p>is pulled down in the hot end</p> <ul style="list-style-type: none"> - An aluminum or brass hot end directly in touch with the heating block, allowing the thermal exchange needed to soften/melt the material and the relevant extrusion through a calibrated orifice - Parts made of different materials and adapted from existing components coming from other fields (<i>e.g.</i> brass nozzles are those used in gas plants) | <ul style="list-style-type: none"> - Variation in the rheological properties of the material to be deposited impacting on <ul style="list-style-type: none"> - uniformity of deposited layers (<i>e.g.</i> due to nozzle clogging and filament erosion/sticking to the gear) - solid state of the formulation components - formation of byproducts - stability (<i>e.g.</i> shrinking, cracking, deflection, fragility, layer detaching) | |
|--|--|--|--|--|

434

435 As we discuss more extensively in the next section, attempts to overcome limitations encountered in
436 the FDM process generally were made by tuning material behavior to adapt to the printer setup
437 instead of empowering the machinery. However, some attempts to use already well-known
438 technologies like piston-based extruders and auger conveyors have been proposed to move FDM
439 printers beyond filament-based processes (Figure 3a, b) (Fanous et al., 2020; Goyanes et al., 2019;
440 Musazzi et al., 2018; Ong et al., 2020). This would enable the machines not only to overcome
441 specific issues related to raw materials, but also to avoid one of the two hot-processing steps
442 required by current FDM printers, removing at least the need for filament production. In particular,
443 the power and robustness of the abovementioned setups might be rapidly adapted to 3D printing
444 hardware, allowing operators to feed the machine with many grades of raw material, in the form
445 either of granules/pellets or powders (Guo et al., 2019). Although skipping the use of filaments
446 represents a significant improvement, in most reviewed cases this was still achieved with custom
447 adjustments to commercial printers. On the other hand, when dealing with pharmaceutical
448 processes, many further improvements are required: for instance, the ability of the device to
449 effectively mix, **plasticize** and achieve steady flow of the homogeneous melt through the nozzle. In
450 this respect, few researchers have investigated the use of more expensive industrial FDM
451 equipment, comparing the characteristics of the final products with those obtained by other mass
452 manufacturing processes, such as IM (Welsh et al., 2019). **By way of example, an open droplet-**
453 **based printing system was developed by Arburg. This was built starting from the experience gained**
454 **on IM presses traditionally used in the plastics industry to process polymeric granules/pellets**
455 **(<https://www.arburg.com/products-and-services/additive-manufacturing/>; Ceskova and Lenfeld,**
456 **2018). As occurs during an IM process, the material is conveyed from the hopper of such a printer**
457 **into a heated barrel where it melts, as a result of temperature increase and rotation of a never-ending**
458 **screw. When a sufficient amount of material accumulates in front of the screw, the latter stops**
459 **rotating and moves forward to inject it into the nozzle. In contrast to IM, there is no mold and the**
460 **nozzle works directly within the build chamber to fabricate the final object bottom up, thus recalling**

461 an FDM process. The equipment can operate at temperatures and pressures greater than 300 °C and
462 400 bar, respectively, being particularly suitable for viscous melts (Figure 3c).

463 The equipment was initially implemented with two separate material preparation units and other
464 specific tools for the fabrication of medical devices in agreement with ISO 13485 standards. It was
465 also provided with precise linear axes for positioning the micrometer of the part carrier, and a
466 closed air/ventilation system for ensuring uniform temperature control in the heated build chamber.

467 One of the main differentiation elements of this new type of printer from desktop FDM ones is the
468 presence of a piezo controlled nozzle to finely control the flow of material as a continuous strand of
469 droplets. As each layer would be composed of a number of these droplets, a higher level of control
470 of shape and morphology as well as density - impacting overall performance of the printed drug
471 product - would be assured. With freedom in adjusting slicing and process parameters an
472 undeniable advantage of new FDM printers, the software was designed as an open system in which
473 the user can fine-tune the conditions to different formulations. Moreover, the extruder assembly can
474 be disassembled for cleaning, and all the parts in contact with the in-process material can be
475 changed. In this respect, it should be stressed that the central problem is still that actual FDM
476 equipment available on the market is generally very far from being standardized for fabricating
477 medicines. Indeed, it lacks many industrial-grade requirements, due to the absence of: *i*) a printing
478 environment well isolated from either the external environment or contaminants, such as lubricants
479 and oils coming from the moving parts; *ii*) the entire assembly made of compliant materials and
480 designed to be safely disassembled for cleaning and maintenance, including parts dedicated to the
481 processing of specific materials; *iii*) the evaluation of any possible contaminants released during a
482 single process and along the entire life of the machine; and *iv*) standards of process-process and
483 printer-printer reproducibility.

484

485 **2.3 Raw materials**

486 A strict control on the characteristics of raw materials may be applied to ensure the quality of the
487 FDM process and the safety of the printed products (Awad et al., 2018; Joo et al., 2020; Jain et al.,
488 2018). With FDM 3D printing, the most common form for raw materials is currently represented by
489 filaments prepared by HME. Depending on the intended use, filaments may be formulated starting
490 from a thermoplastic polymer either adding only processing adjuvants and release modifiers, or also
491 drugs (Hsiao et al., 2018; Melocchi et al., 2016). While in the latter case monolithic dosage forms
492 (either having immediate or modified release performance) would be printed, in the former case,
493 shells, coatings or separating structures may be fabricated to be combined with drug-containing
494 parts.

495 Initially, researchers resorted to polymeric filaments already available on the market, loading the
496 active ingredients from solutions by soaking or by re-extrusion (Goyanes et al. 2014, 2015a, b, c;
497 Saviano et al., 2019; Skowrya et al., 2015). However, the main drawbacks of the former process were
498 the limited drug loading (< 2%), swelling of the filament during immersion, and shrinkage after
499 drying. Re-extrusion instead enabled incorporation of relatively higher amounts of drug. Moreover,
500 resorting to re-extrusion enabled the preparation of solid dispersions with an improvement in the
501 dissolution rate of poorly soluble drugs (Jamróz et al., 2018b; Sandler et al., 2014; Solanki et al.,
502 2018). Subsequently, the research focus shifted on evaluating the possibility of preparing filaments
503 by HME starting from pharmaceutical-grade polymers (Alhijaj et al., 2015; Genina et al., 2016;
504 Holländer et al., 2016; Melocchi et al., 2016). In the frists attempts, simple equipment was tested, for
505 instance, machinery that allow the recycling of plastics (*e.g.*, Filabot). Afterwards, more
506 sophisticated single- and twin-screw extruders (*e.g.*, HAAKE MiniLab and Process 11 parallel
507 twin-screw extruder by Thermo Scientific) were evaluated.

508 The feeding material (*i.e.* the thermoplastic polymer-based formulation undergoing HME) is of
509 primary importance; as a matter of fact, the need for pharmaceutical-grade ingredients greatly limits
510 the type of polymers that can be used. Even when thermoplastic polymers approved for
511 pharmaceutical use can be identified as suitable candidates, a further requirement comes from the

512 need for the material to flow through the printer nozzle at temperatures that will not cause the
513 degradation of any of the components, *i.e.*, the polymer, the API and other excipients (Aho et al.,
514 2019; https://www.fabrx.co.uk/technologies/?utm_term=0_13f427b78b-78b91812b1-41694769)
515 [84,130]. This often requires the addition of plasticizers, capable of decreasing the viscosity of the
516 raw materials and making them printable at suitably low temperatures (Kempin et al., 2018;
517 Kollamaram et al., 2018; Pereira et al., 2019; Pietrzak et al., 2018). Indeed, the plasticizer reduces
518 the process temperature of the polymer in use and also acts as a softener for the solid filament. This,
519 however, may impair the feeding of the filament into the nozzle of the FDM printer. Therefore, a
520 trade-off between the reduction in melt viscosity at printing temperature and the maintenance of
521 stiffness of the solid filament at feeding - typically room-temperature - is always needed. Besides
522 the need to check that the composition of the filament is homogeneous (particularly when
523 containing a drug either dissolved or suspended), the material itself must fulfill several contrasting
524 requirements to ensure printability as well as quality and safety of the final product (Aho et al.,
525 2019). For example, after deposition from the printer nozzle, the material must solidify fast enough
526 to sustain the weight of upcoming layers but slow enough to allow interdiffusion between adjacent
527 layers, thus ensuring cohesion and structural integrity of the printed product. These opposite
528 requirements are associated with the polymer's thermal behavior and diffusivity, respectively, with
529 the latter ultimately correlated to its melt-viscosity. In this respect, Table 2 lists the most important
530 **thermo-mechanical** requirements for each phase of the FDM process and the actions to be taken to
531 fulfill them, along with the material/filament properties involved. Specific methods proposed in the
532 literature for their characterization are also reported.

Table 2: FDM process requirements, relevant material/filament properties and characterization methods.

| FDM PHASE | REQUIREMENT | PROPERTY | CHARACTERIZATION METHODS |
|---|---|--|---|
| Filament supply | The filament must be spooled in order to be supplied to the printing facility | Mechanical: <ul style="list-style-type: none"> - Limited stiffness (limited Young Modulus) - High strength (high stress and strain at yielding/fracture) | <ul style="list-style-type: none"> - Tensile tests - Bending tests |
| Feeding and nozzle extrusion | The filament must be pushed into the heating chamber | | |
| | - Without breaking within the feeding gears | Mechanical: <ul style="list-style-type: none"> - High strength (high stress and strain at fracture) | <ul style="list-style-type: none"> - Tensile tests - Bending tests - <i>Ad hoc</i> tests (e.g. Repka-Zhang test) |
| | - Without slippage within the feeding gears | Mechanical: <ul style="list-style-type: none"> - Adequate resistance to yielding to compression (high yield stress) / hardness | <ul style="list-style-type: none"> - Compression tests - Bending tests - Hardness tests |
| | - Without breaking after the feeding gears and in the nozzle | Mechanical / rheological: <ul style="list-style-type: none"> - Adequate buckling resistance (e.g. Venkataraman criterion) | <ul style="list-style-type: none"> - Tensile tests - Rotational/capillary rheometry |
| | - Without excessive deformation between the feeding gears and the nozzle | Mechanical: <ul style="list-style-type: none"> - Limited dependence of young modulus on temperature | - Dynamic mechanical analysis |
| | | Thermal: <ul style="list-style-type: none"> - Limited thermal conductivity/diffusivity | - Thermal analysis (Laser flash method) |
| | The material must flow | | |
| | - Through the nozzle | Rheological: <ul style="list-style-type: none"> - Adequate viscosity | <ul style="list-style-type: none"> - Melt flow index - Rotational/capillary rheometry |
| | - At a controlled rate | Dimensional: <ul style="list-style-type: none"> - Circular filament cross section - Constant filament diameter | - X and y axes laser measurements, e.g. Ovalization |
| | - Without degradation | Thermal/chemical: <ul style="list-style-type: none"> - Degradation temperature higher than process temperature | - Thermogravimetry |
| - Without instability | Rheological | - Capillary rheometry | |
| Layer by layer deposition / solidification | Deposited layers | | |
| | - Must have the desired size | Rheological: <ul style="list-style-type: none"> - Adequate extensional viscosity | - Extensional rheometry |
| | - Must weld to each other | Physical/rheological: <ul style="list-style-type: none"> - Adequate macromolecule interdiffusion | - Rotational rheometry (as indirect method) |
| | - Must keep their shape (control over expansion or contraction post extrusion) | Mechanical: <ul style="list-style-type: none"> - Limited dependence of young modulus on temperature | - Dynamic mechanical analysis |
| Thermal: <ul style="list-style-type: none"> - Adequate thermal conductivity/ diffusivity | | - Thermal analysis (Laser flash method) | |

534 Thermal characterization was generally carried out through standard techniques, such as
535 thermogravimetry to inspect material degradation behavior, differential scanning calorimetry to
536 determine the thermal behavior and transition temperatures of the material, and to investigate any
537 modification in the glassy/crystalline phase of the API, if present (Alhijjaj et al., 2016; Korte and
538 Quodbach, 2018; Melocchi et al., 2018; Öblom et al., 2019; Sadia et al., 2016). **Chemical analyses
539 and solid-state characterization of formulation components were also performed by other analytical
540 techniques (e.g., x-rays, infrared spectroscopy and high performance liquid chromatography) to rule
541 out any modification associated with hot-processing.** Rheological characterization was performed
542 by standard methods, such as melt-flow index determination, to get a first indication of material
543 printability; and rotational or capillary rheometry when more accurate data were needed, also in
544 view of the modeling of the FDM process (Aho et al., 2015, 2017; Baldi et al., 2014, 2017; Casati et
545 al., 2018; Matijašić et al., 2019; Sadia et al., 2016). A strict control over the filament diameter and
546 shape is needed, as dimensional fluctuations cause changes in the flow of material through the
547 nozzle and subsequent potential nonconformities in printed part dimensions and drug content. As
548 for the evaluation of mechanical performance, no well-established protocol is available yet.
549 According to recent literature, filaments were characterized in terms of mechanical and surface
550 properties, for example stiffness, brittleness, roughness, using commercially available polylactic
551 acid filament as a reference. In parallel, the suitability of custom-made filaments for loading into
552 commercial 3D printers was only qualitatively evaluated by identifying possible issues that could
553 arise during the process: breakup, wrapping around the loading gears and loading process
554 robustness. Manual adjustment of the equipment configuration (e.g., the compression force applied
555 by the gears) together with changes in the filament formulation (e.g., variation in the amount of
556 plasticizer, addition of reinforcement and blending of different polymers) were shown as
557 alternatives to achieve effective loading (Alhijjaj et al., 2016; Melocchi et al., 2016; Solanki et al.,
558 2018). More specifically, the main methods described for characterizing the mechanical properties
559 of filaments span from standard tensile or flexural testing to dedicated procedures, such as the

560 Repka-Zhang tests, the combination of dynamic mechanical analysis and tensile tests, as well as
561 various hardness measurements (Aho et al., 2019; Fuenmayor et al., 2018; Nasereddin et al., 2018;
562 Palekar et al., 2019; Yang et al., 2018; Zhang et al., 2017a, 2019).

563 The information provided by these tests, however, is not enough to predict printability and cannot
564 be used to completely set up or fully control the printing process. Conversely, investigating the
565 characteristic behavior (stress-strain) of the material should be carried out by standard techniques to
566 determine its intrinsic mechanical properties, such as the elastic modulus. At a minimum, these
567 properties can be taken into account to determine the printability of a material by comparison with
568 the reference standard. In more refined setups, these properties could be exploited to design the
569 printing process, taking advantage of purposely built mathematical models. Finally, regarding the
570 definition of reference values for each of the properties highlighted here, the main challenge is
571 represented by the strong and complex correlations between material properties, printer features
572 (*e.g.*, nozzle dimensions and shape, feeding system) and process parameters (*e.g.*, feeding rate,
573 nozzle temperature, relative speed between nozzle and tray). Only in a few cases was it possible to
574 identify material attributes that are independent from the printing parameters, such as those
575 proposed by Venkataraman and colleagues to predict filament buckling in the printer nozzle
576 (Venkataraman et al., 2006).

577 Besides the difficulties and questions raised by the need for a rigorous characterization of the
578 filament, its use in most FDM equipment poses a fundamental issue related to the presence of a
579 double heating cycle to the material, first in the filament production by HME and then in its
580 deposition by the printer. In fact, even when working with pharmaceutical-grade excipients, the
581 stability of the intermediate and final products should be verified. Moreover, the second heating
582 step raises issues associated with the homogeneity of the molten formulation, especially when a
583 high load of immiscible phase in the melt is involved, impacting the uniform composition of the
584 final drug product. In addition, the configuration of the printer hardware that regulated the feeding
585 rate of the filaments exhibits a limited ability to generate pressure and to force the material through

586 the nozzle, narrowing the number of polymers that can be processed. In this respect, printing relying
587 on piston, auger and droplet-based deposition technology have very recently been tested in order to
588 avoid the need for manufacturing an intermediate product, as was discussed previously.

589

590 **2.4 Controls**

591 For fabrication of personalized medicines by FDM 3D printing, non-destructive, real-time
592 measurements of the critical quality attributes is a promising strategy for reducing the costs
593 associated with testing while ensuring product quality (Trenfield et al., 2018a,b; Radhakrishnan et
594 al., 2020; Preis and Öblom, 2017; Sandler et al., 2014; Edinger et al., 2018a;
595 [https://www.usp.org/sites/default/files/usp/document/our-work/research-innovation/research-
596 innovation-3d-printing-drug-products.PDF](https://www.usp.org/sites/default/files/usp/document/our-work/research-innovation/research-
596 innovation-3d-printing-drug-products.PDF); Markl et al., 2018). In this respect, the quality by design
597 (QbD) approach is an essential reference (Chandekar et al., 2019; Aucamp and Milne, 2019;
598 Grangeia et al., 2020; Mishra et al., 2018; Yu et al., 2014; Warsi et al., 2018). Its goal is to
599 continuously deliver products with consistent performance by creating a control strategy to
600 guarantee that all sources of process variability are identified, well understood and managed. Risk
601 mitigation may be attained by fostering identification of the critical process parameters (CPPs),
602 which potentially can impact the final product quality (*i.e.*, critical quality attributes, CQAs) as well
603 as its safety, and how these parameters interact with each other. However, such in depth-
604 understanding is yet to be fully attained. CPPs might include printing orientation, layer height,
605 nozzle size, raw material feeding rate, printing speed, nozzle and build plate temperatures, fan speed
606 and relevant variability during the process. Moreover, the characteristics of the starting material
607 should be controlled within specific limits, as discussed before.

608 Such an approach aimed at the optimization of FDM is being pursued in other fields, as it was
609 recognized as critical to improving the overall quality of the printed objects, mostly in terms of
610 aspect, mechanical resistance and sealing between layers (Bähr and Westkämper, 2018; Carlier et
611 al., 2019; Gordeev et al., 2018; Martinez-Marquez et al., 2018; Mohamed et al., 2015; Sood et al.,

612 2009). For example, a study evaluated the possibility of using a custom-made sensor (*i.e.*, a rotation
613 encoder driven by the movement of the filament) to detect the advancement of the filament in the
614 extruder of any FDM printer (Soriano Heras et al., 2018). By checking the encoder rotation
615 repeatedly, control software could determine if the filament is going forward at the desired rate. If
616 no progress is detected, the equipment will stop, allowing the operator to intervene in a timely
617 manner without having to discard the part. This approach, by providing feedback control on the
618 amount of input filament, would also allow for the adjustment of extrusion speed if the measured
619 value does not match the desired one.

620 A few preliminary studies also can be found in the scientific literature relevant to the fabrication of
621 dosage forms/DDSs (Alhijaj et al., 2019; Gioumouxouzis et al., 2017; Markl et al., 2018; Palekar et
622 al., 2019; Smith et al., 2018a, b). However, in these first attempts only a limited number of
623 operating conditions were taken into account, while numerous processing variables - most of them
624 with intrinsic dependence on each other - still need further investigation. These variables include
625 release performance, aspect, density, porosity, friability, fragility and presence of contaminants,
626 such as heavy metals, microbiological and byproducts. In addition, future studies should analyze the
627 reproducibility of the printing process, not only for a single print but for all the products belonging
628 to a single batch.

629 In order to guarantee batch-to-batch uniformity and accelerate the final batch release, the integration
630 of analytical techniques generally used in quality control laboratories into the printers would be
631 highly beneficial (Aucamp and Milne, 2019; Edinger et al., 2018a; Goyanes et al., 2018; Khorasani
632 et al., 2016; Lamichhane et al., 2019; Markl et al., 2017; Robles-Martinez et al., 2019; Scoutaris et
633 al., 2018; Smith et al., 2018a; Trenfield et al., 2018c, 2020). This approach, already tested in
634 continuous manufacturing processes, can be enabled by process analytical technologies (PAT) such
635 as optical measurements and spectroscopic tools (*e.g.*, different infrared spectroscopy techniques
636 such as FTIR and NIR, X-ray, Raman) (Trenfield et al., 2018a; Rahman et al., 2018). Indeed, the
637 latter has already been demonstrated to be suitable for real-time monitoring of various critical

638 quality attributes, such as mass uniformity, moisture content, polymorphism, purity, air entrapment,
639 size, drug content, hardness and disintegration time. Temperature and image sensors, ultrasound,
640 hyperspectral imaging and lasers also could be implemented in on-line measurement of melting
641 temperature, individual layer thickness and product geometry. For example, image analysis would
642 enable operators to obtain multiple views of a product during fabrication so it could be compared
643 with a virtual model to rule out any possible deviations. Thermal imaging could provide insight into
644 polymeric material interfaces, providing a tool to predict thermomechanical properties of the final
645 product and give early warning of potential degradation. Terahertz pulsed imaging would yield data
646 on the microstructure of the printed products. **Mathematical models could also be built from the**
647 **collected data in order to predict the quality attributes of the systems under fabrication (e.g. assay,**
648 **dissolution and impurities), which then have to be confirmed by analytical testing. The proposed**
649 **approach would in principle de-risk fabrication via 3D printing, especially when dealing with an**
650 **extensively studied formulation. In this respect, by reducing the number of analytical tests required,**
651 **it could decrease time and costs associated with the release of a specific batch (Aho et al., 2019).**
652 Indeed, the attainment of a personalized drug product might be considered an inverse problem,
653 since its characteristics (e.g., combination of active molecules, release profiles, mechanical
654 properties) are predetermined in view of the needs of specific patients, and the task is to establish
655 which parameters (e.g., infill, number of shells, starting materials, product geometry) would assure
656 their achievement in the printed products (Novák et al., 2018). The concept of finding the solution
657 to an inverse problem, taking advantage of well-known correlations between operating parameters
658 and outputs is a common strategy in many fields of product development. Obviously, before being
659 able to enforce such mathematical models based on reliable correlations (of a deterministic or
660 statistical nature), they need to be developed, optimized and validated. The availability of a
661 significant amount of data collected during 3D printing prototyping campaigns and small-series
662 production runs could help in building models with machine learning algorithms. The models could
663 then be refined as more data are collected in larger-scale production campaigns. **A few research**

664 studies were very recently undertaken to focus on this topic, for instance with the goal of gaining
665 insight into how and to which extent process parameters would affect the critical quality attributes
666 of the finished products. The desired characteristics could be attained by following specific
667 modifications of already identified critical 3D printing parameters, including those relevant to the
668 design step (Korte and Quodbach, 2018; Markl et al., 2017, 2018; Smith et al., 2018a,b; Solanki et
669 al., 2018).

670 Notably, development of software able to create and store suitable digital models of specific items,
671 set operating parameters and capture, manage and save resulting data and all other information
672 associated with production records in a dedicated cloud-based system, would be equally important
673 (Gioumouxouzis et al., 2019; Khatri et al., 2018). At the same time, such software has to be
674 protected from undesired external access, as it would contain sensitive metadata. Moreover, it might
675 be proprietary and developed to work with specific printers, thus increasing the security
676 requirements, but also limiting sharing and accessibility. This software would also create a
677 paperless quality control system, which is essential. For example, one could study the feasibility of
678 QR codes to be verified by smart devices equipped with barcode scanners to enable the tracing of
679 different batches, avoiding mix-ups. Recently, this strategy has also been applied to the fabrication
680 of monolithic systems on top of which traceability codes were printed by inkjet printing (Edinger et
681 al., 2018b; Trenfield et al., 2019b).

682 Software should be checked at pre-established time intervals, to prevent any possible cyber risk
683 (Gioumouxouzis et al., 2019; Khairuzzaman, 2018; Souto et al., 2019). Moreover, issues involving
684 liability, intellectual property and data protection (*e.g.*, digital model, profiles containing the
685 operating parameters, patient data) would need to be addressed to protect manufacturers, operators
686 and end-users.

687 Appropriate procedures need to be developed, especially regarding batch acceptance/rejection.
688 These would benefit from mathematical models built starting from PAT data. Employees should be

689 trained not only on the hardware (*e.g.*, on how to operate, clean and maintain the printer and solve
690 possible issues or deviations), but also on the software.

691

692 **2.5 Environment**

693 The environment where the FDM process is performed also is a key factor impacting the quality of
694 the finished product, especially if unit operations other than 3D printing are carried out
695 simultaneously, as this increases the risk of cross-contamination and hazards for all manufacturing
696 operators involved (Araújo et al., 2019). Such facilities would benefit from a controlled modular
697 structure, as this would reduce the abovementioned risks and simplify the replication of the
698 manufacturing lines in different locations. In this respect, the number of modules to be installed
699 might depend on the expected production volume. As previously discussed, these facilities might be
700 viewed as small-scale manufacturing plants, as they would be conceived with an industrial mindset;
701 for instance, they would be highly automated. Indeed, manual operation would not be suitable for
702 the safe manufacturing of numerous batches of personalized drug products in view of possible
703 issues related to traceability and mix-up. This awareness would open new and interesting
704 opportunities in the application of robotics in pharmaceutical manufacturing, which has just begun
705 to be explored (Fiorini and Botturi, 2008; Kapoor et al., 2020; Rutherford and Stinger, 2001). The
706 new facilities also would be characterized by consistent design, well-established infrastructures,
707 frequently updated procedures, well-maintained hardware/software and suitable and verified control
708 tools, as well as trained personnel. Overall, these would be difficult and expensive to include in a
709 traditional compounding pharmacy, also due to the considerable amount of electricity required to
710 maintain the infrastructure.

711

712 **3. Risks to the operator**

713 Although researchers currently are making significant efforts to quickly and thoroughly investigate
714 the potential of FDM in fabricating drug products, safety-related studies so far have not been
715 pursued with comparable intensity (Gioumouxouzis et al., 2019; Jamróz et al., 2018a). These issues
716 are crucial in understanding the challenges entailed by a new manufacturing process, for which
717 managing risks and guaranteeing adequate safety conditions for operators' health and for the
718 environment is essential.

719 Fabricating medicines often entails extended exposure to chemicals and hazardous conditions
720 (Bhusnure et al., 2018; Binks, 2003; Gathuru et al., 2015;
721 [https://www.who.int/medicines/areas/quality_safety/quality_assurance/ApplicationHACCPMethod](https://www.who.int/medicines/areas/quality_safety/quality_assurance/ApplicationHACCPMethodologyPharmaceuticalsTRS908Annex7.pdf?ua=1)
722 [ologyPharmaceuticalsTRS908Annex7.pdf?ua=1](https://www.who.int/medicines/areas/quality_safety/quality_assurance/ApplicationHACCPMethodologyPharmaceuticalsTRS908Annex7.pdf?ua=1)). These conditions must be strictly controlled and
723 highly regulated to guarantee that personnel will always work under specific levels of tolerated risk
724 for each potentially hazardous variable (*i.e.*, threshold limits). In traditional manufacturing that uses
725 well-established machinery and processes, possible sources of risk are already well-known and
726 easily predictable so that relevant countermeasures can be adopted. Novel technologies, on the other
727 hand, require the development of specifically tailored risk-related studies. In this respect, safety
728 evaluation of the mechanical hazards associated with FDM production cycles, such as hot parts and
729 motors, and the risks associated with exposure to fumes, are needed. While the former would be
730 relatively easy to handle, the latter is still at an initial phase outside of the pharmaceutical area
731 (Byrley et al., 2018; Floyd et al., 2017; Gümperlein et al., 2018; Jeon et al., 2020; Yi et al., 2016;
732 Zhang et al., 2017b).

733 Indeed, this topic has begun to be addressed in view of the increasing popularity of FDM machines
734 for at-home and office use. Researchers recently have evaluated the contaminants developed during
735 3D printing processes, due to the high temperatures involved, and the effects of printer and filament
736 properties on levels of contaminants (*e.g.*, approximately 300,000 particles/cm³ and
737 65,000 particles/cm³ for acrylonitrile butadiene styrene and polylactic acid filaments, respectively).

738 Overall, FDM equipment has been shown to release volatile organic chemicals (VOCs) and
739 ultrafine airborne particles (*i.e.*, < 100 nm in diameter), indicating the potential for inhalation and
740 consequent health risks, especially with long-term exposure. These contaminants are emitted during
741 the thermal processing of many thermoplastic materials and also can be generated when FDM is
742 used to fabricate drug products starting from filaments based on pharmaceutical-grade polymers.
743 While ultrafine particles may have serious health effects, such as increased oxidative stress,
744 inflammation, cardiovascular effects and cytotoxicity, VOCs may contribute to the development of
745 asthma, allergies, obstructive pulmonary disease and lung cancer (House et al., 2017). Particularly,
746 people using 3D printers reportedly may be at risk for respiratory problems, including work-related
747 asthma. Studies on animal models also have shown that such small particles may migrate to the
748 brain through the olfactory system.

749 Systematic studies have evaluated risks associated with FDM, relying on a wide range of
750 experimental methods, mainly those using commercially available filaments and equipment
751 (Stefaniak et al., 2017; Steinle, 2016; Wojtyła et al., 2017, 2020). Although nozzle temperature has
752 largely been recognized as one of the most important variables for generating contaminants, other
753 factors may play major roles. These include:

- 754 *i)* the type and state of the printer, *e.g.*, presence of an external enclosure, number of nozzles,
755 state of maintenance;
- 756 *ii)* the operating parameters, *e.g.*, print speed, printer nozzle size, layer height, build plate
757 temperature;
- 758 *iii)* the characteristics of the employed filament, *e.g.*, presence of adjuvants or undesired
759 contaminants that could occur in degradation;
- 760 *iv)* the characteristics of the item to be printed, *e.g.*, weight and complexity, which impact
761 fabrication time;
- 762 *v)* environmental factors, *e.g.*, room size, ventilation, presence of filters.

763 In order to develop a safer-by-design approach, FDM standard emissions testing protocols should
764 be developed, for instance, drawing inspiration from those already available for laser printers.
765 Scientific works have also advised transforming precautions into operator safety procedures.
766 Recommendations include *i*) using a full enclosure, *ii*) operating the printer in a well-ventilated
767 room and directly ventilating the printer, *iii*) maintaining a certain distance from the equipment to
768 minimize inhalation of emitted particles, *iv*) turning off the printer, in the case of nozzle clogging,
769 and allowing it to ventilate before removing the cover, and *v*) relying on the industrial hygiene
770 hierarchy of controls to mitigate exposures (*i.e.*, from most to least preferable: engineering controls,
771 administrative controls, protective equipment). Also procedures relevant to FDM equipment
772 cleaning should be developed, as heating and purging residues of a previously processed material
773 through load of a new one and would not be compliant. Cleaning operations would be of utmost
774 importance when a new batch of product with different composition has to be printed. In this
775 respect, verification of the printer *status* should also be performed, taking advantage of analytical
776 testing methods to ascertain the absence of contaminants.

777 When considering structures dedicated to FDM, especially for drug products, installing special
778 filters should be considered (Byrley et al., 2019; Floyd et al., 2017). While HEPA filters seem to be
779 ineffective, filters relying on photocatalysis could represent a possible solution. These do not lead to
780 the adsorption of pollutants, but instead degrade them via the activation of oxidative reactions.
781 Moreover, photocatalysis can remove pollutants in very low concentrations, enabling odorless and
782 safe printing.

783

784 **4. Regulatory engagement**

785 3D printing is considered as an emerging technology due to its potential to improve product safety,
786 identity, strength, quality, or purity in certain applications (Khairuzzaman, 2018; Souto et al., 2019;
787 Lee and Zidan, 2018; Zidan, 2019; Zidan et al., 2019a, b). Through the Emerging Technology

788 Program (ETP) developed by Office of Pharmaceutical Quality, Center for Drug Evaluation and
789 Research (CDER), sponsors can engage with the Agency to discuss, identify, and resolve potential
790 technical and regulatory issues regarding the development and implementation of a novel
791 technology prior to filing a regulatory submission
792 ([https://cdn.ymaws.com/www.casss.org/resource/resmgr/dcdg_events/1218_DCDG_BrorsonKurt.p](https://cdn.ymaws.com/www.casss.org/resource/resmgr/dcdg_events/1218_DCDG_BrorsonKurt.pdf)
793 [df; https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/emerging-technology-](https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/emerging-technology-program)
794 [program; https://www.fda.gov/files/drugs/published/Advancement-of-Emerging-Technology-](https://www.fda.gov/files/drugs/published/Advancement-of-Emerging-Technology-Applications-for-Pharmaceutical-Innovation-and-Modernization-Guidance-for-Industry.pdf)
795 [Applications-for-Pharmaceutical-Innovation-and-Modernization-Guidance-for-Industry.pdf;](https://www.fda.gov/files/drugs/published/Advancement-of-Emerging-Technology-Applications-for-Pharmaceutical-Innovation-and-Modernization-Guidance-for-Industry.pdf)
796 <https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/advanced-manufacturing>).
797 To support the ETP, FDA engages in proactive research on the impact of emerging technologies on
798 product quality. Knowledge gained from the internal and sponsored research inform the feedback
799 provided the ETP, ensuring that FDA regulatory policies reflect state-of-the-art manufacturing
800 science. FDA representatives also actively participate in ongoing public-private partnerships to
801 collaborate with a broad range of interdisciplinary stakeholders. **FDA collaborates with America**
802 **Makes organization and participates in research, definition of standards, and road-mapping**
803 **activities to foster high quality innovation in 3D printed medical products**
804 **([https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/advanced-](https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/advanced-manufacturing)**
805 **[manufacturing](https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/advanced-manufacturing)).**
806 The controls, characterization, and testing necessary to ensure product quality for 3D printed drug
807 products may depend on a variety of factors, such as properties of the active ingredient and other
808 formulation components, geometry of the product, 3D printing technology and parameters, drug
809 loading and type of product, *e.g.*, single, multiple, personalized or drug-device combination. Given
810 the variety of 3D printing technologies, materials, geometries and designs, there is no one size fits
811 all control strategy that may be applicable in all cases. In this respect, manufacturers are responsible
812 for determining and justifying with supporting information an appropriate control strategy for their
813 products. It is then anticipated that 3D printed drug products will generally follow the same

814 regulatory requirements in terms of safety, efficacy and quality, and submission expectations as any
815 drug product manufactured using other techniques. In some cases of fixed dose combinations and
816 drug-device combination products, 3D printing manufacturing may raise different questions of
817 safety and/or effectiveness specifications. If the type of technical information to be provided in the
818 submission for a 3D printed drug product is unclear, manufacturers may engage with ETP through
819 the pre-submission process to obtain more detailed feedback.

820

821 **5. Conclusions**

822 Moving to FDM 2.0 in 2020 is a challenge the pharmaceutical community can win. In this respect,
823 this manuscript aims to be a state-of-the-art portrait of FDM, providing readers with a wide and
824 critical overview of the knowledge acquired and areas that still need to be addressed. Indeed, such a
825 provocative approach could be useful in laying the foundation for implementing FDM in the
826 manufacturing of efficacious, safe and high-quality drug products that are suitable for human use.
827 Once the FDM 2.0 phase starts, a next step is to consider good distribution practices, in order to
828 define the role of the printing infrastructure - either direct distribution or just manufacturing and
829 reference for traditional distribution.

830 Much work clearly needs to be done before personalized 3D printed products become widely
831 available to patients, not just from the viewpoint of manufacturing. Understanding which regulatory
832 paths apply to the different phases of the overall process (*e.g.*, approval of starting materials,
833 printers, software, control tools, environment) might be more difficult (Gioumouxouzis et al., 2019;
834 Khairuzzaman, 2018; Stones and Jewell, 2017).

835 Moreover, a debate still exists as to whether 3D printed medicines should be fabricated only for
836 products with expired patents. For example, extemporaneous formulations following the
837 prescription of a licensed professional are exempted and should not be considered patent violations,
838 according to intellectual property law in several countries. On the other hand, if 3D printed

839 medicines will be industrially produced, the means of undertaking clinical trials or bioequivalence
840 studies to ensure safety are still unclear. However, since these drug products would be fabricated for
841 specific subjects with unique characteristics, and therefore would differ from each other, a quality
842 approach based on the statistical analysis of the data for a predetermined number of volunteers
843 would be particularly challenging and expensive, especially if such studies would be performed on
844 each individual. Gathering patient feedback and monitoring the critical parameters for a specific
845 disease (*e.g.*, blood pressure, insulin level) would therefore represent a potential alternative to
846 evaluating effectiveness of personalized products.

847 In conclusion, to make FDM-printed personalized drug products available to patients,
848 manufacturers and all the people involved must carefully consider all the aspects described in this
849 review. The effective collaboration of different experts from academia, regulatory agencies, and
850 industry may provide a great start for launching a first personalized product as a proof of concept.

851

852

853 **Conflict of interest**

854 No potential conflict of interest was reported by the authors.

855 This research did not receive any specific grant from funding agencies in the public, commercial, or
856 not-for-profit sectors.

857

858 **Acknowledgements**

859 The authors would like to thank Joanne Berger, FDA Library, and Karen Valentine, FDA Center for
860 Devices and Radiological Health, for manuscript editing assistance.

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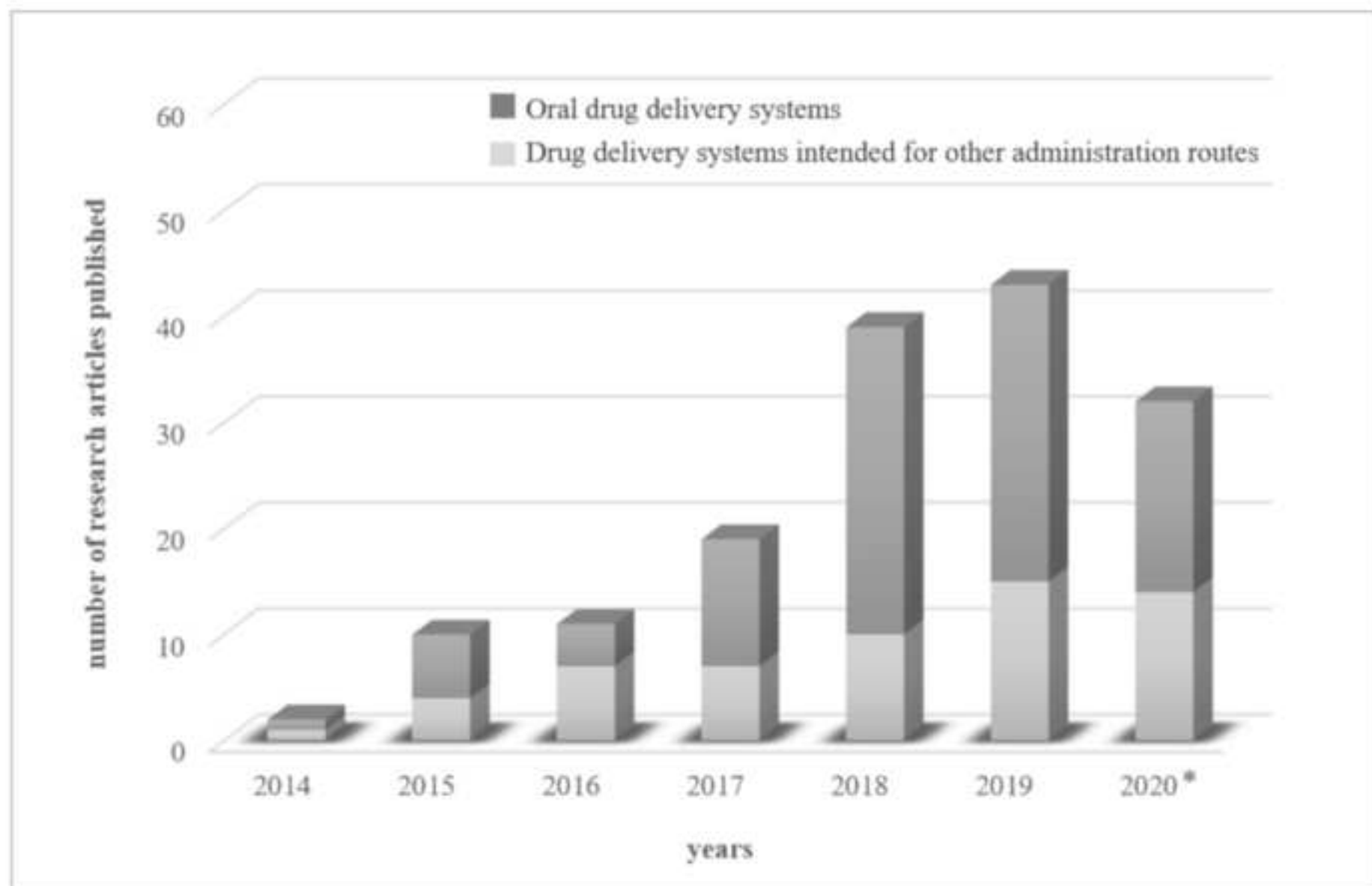
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Declaration of interests

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

The authors declare the following financial interests/personal relationships which may be considered as potential competing interests:

Figure 1



* until July 20, 2020

Figure 2

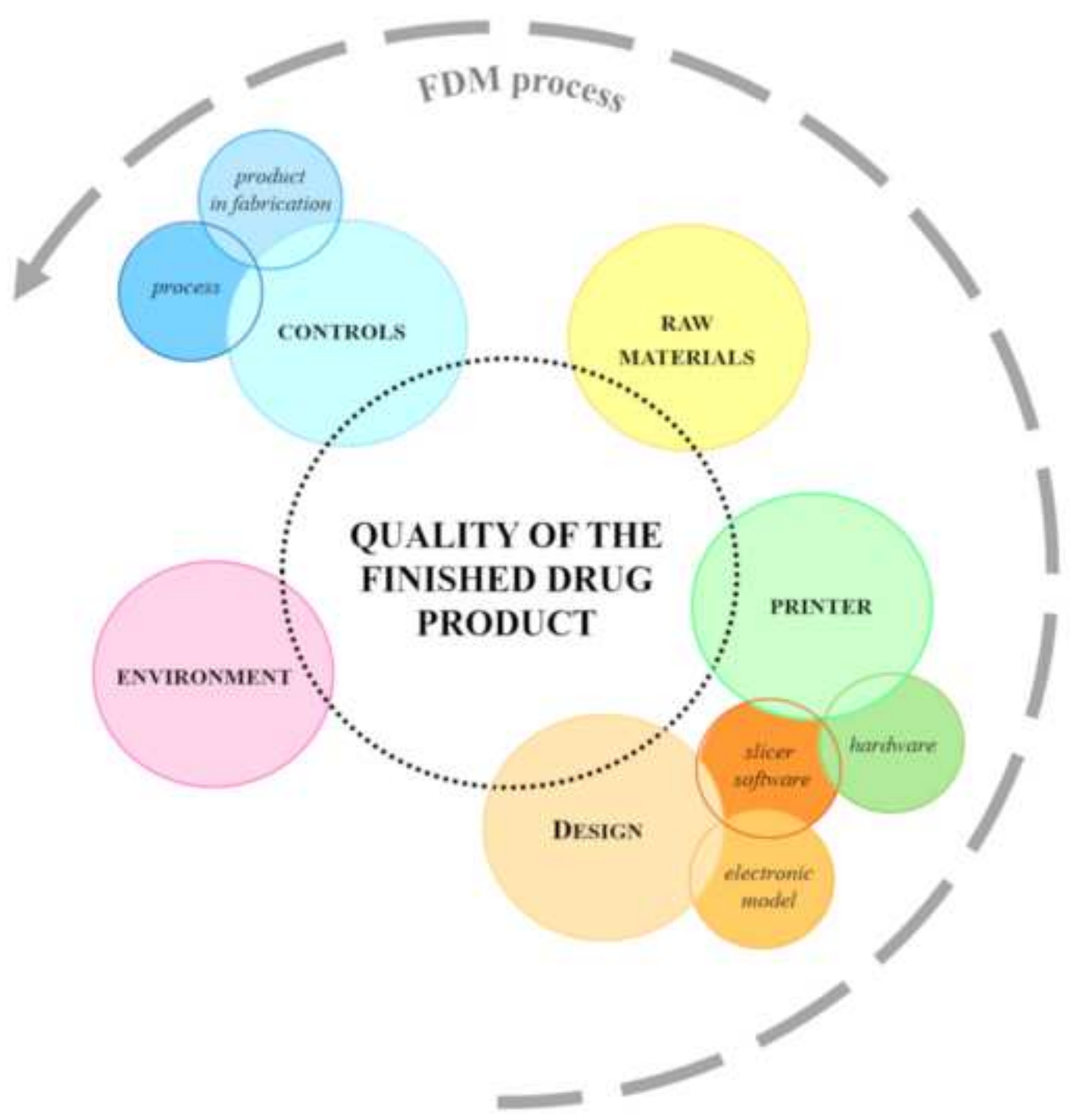


Figure 3

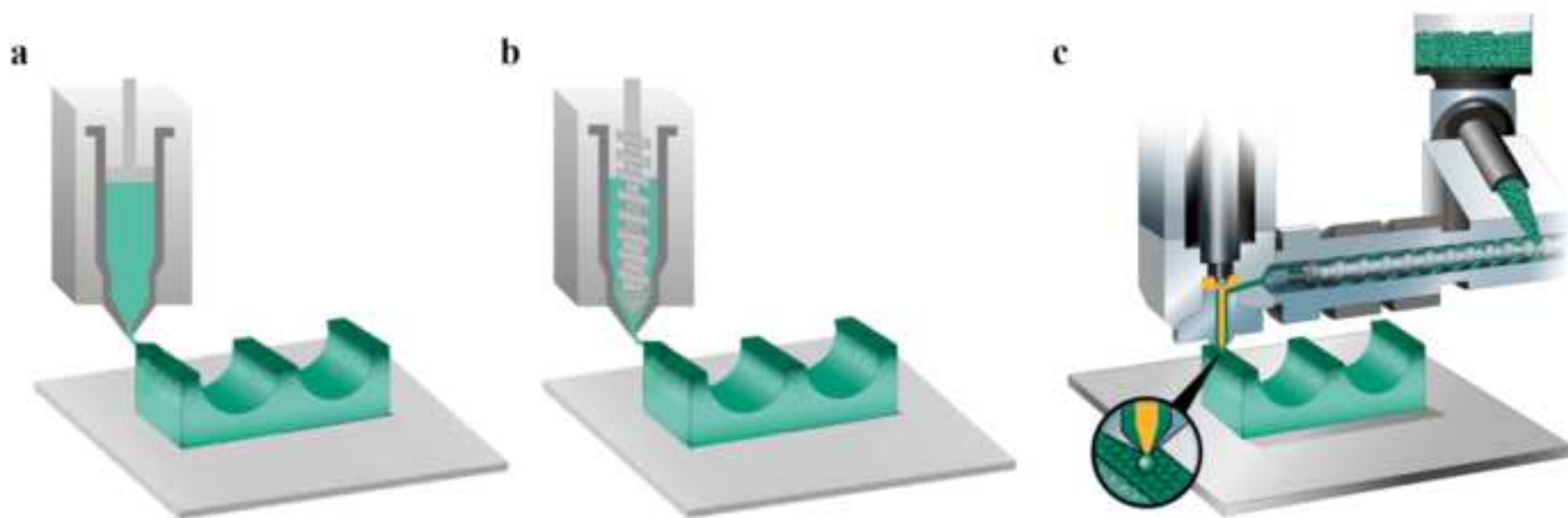


Figure 1: Total number of research articles (review articles excluded) on FDM, sorted by year of publication (sources: PubMed, Web of Science and Embase; search terms used: ‘3D printing’ OR ‘additive manufacturing’ OR ‘fused deposition modeling’ AND ‘dosage form’ OR ‘delivery system’ OR ‘drug.’ Only papers referring to drug-loaded formulations were included).

Figure 2: Outline of key parameters involved in the quality of FDM drug products

Figure 3: Outline of FDM 3D printers using granules/pellets as starting materials relying on (a) piston, (b) auger and (c) droplet-based deposition system (adapted from Welsh et al., 2019 and Ceskova and Lenfeld, 2018).

...portrait of the state of the art

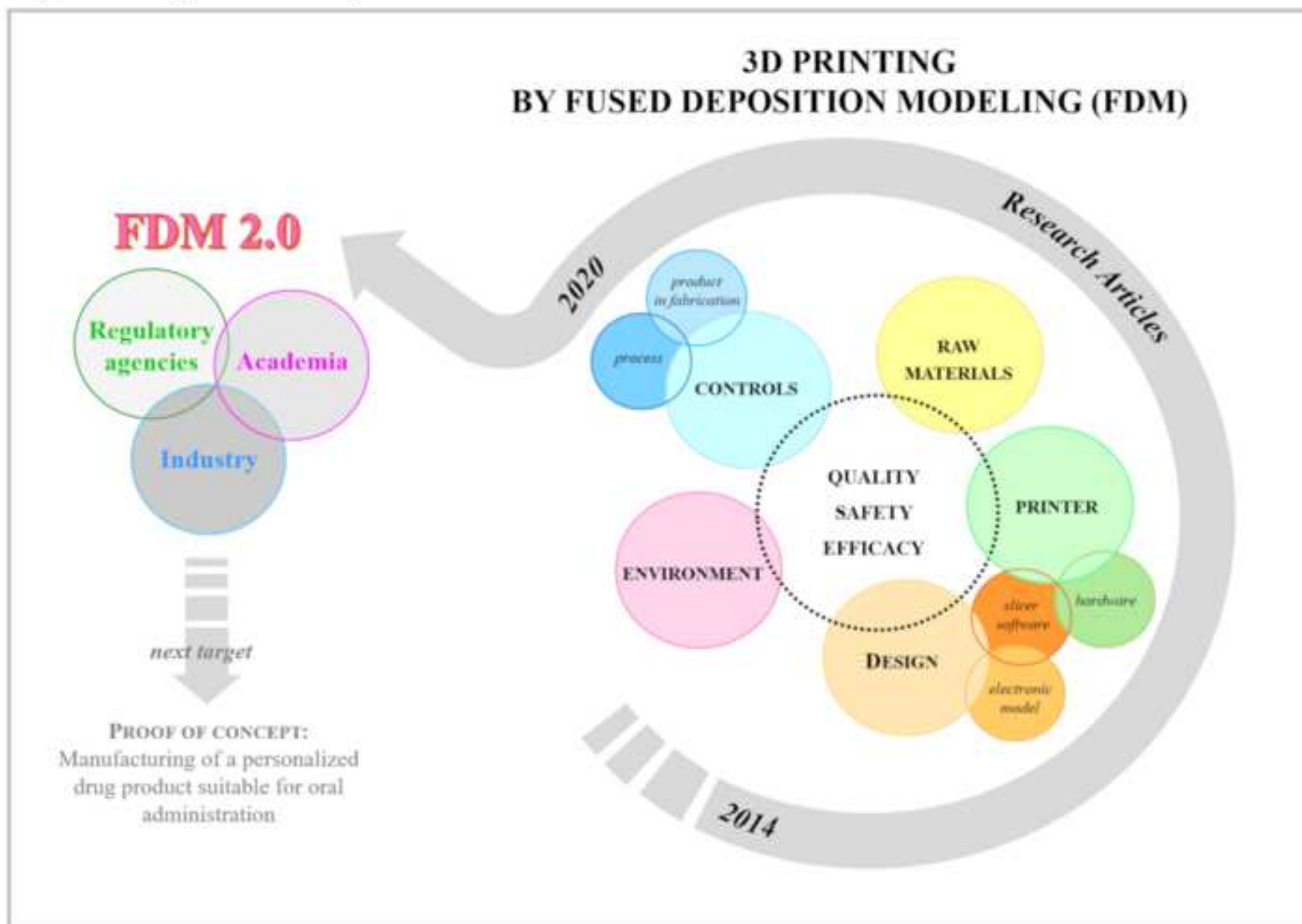
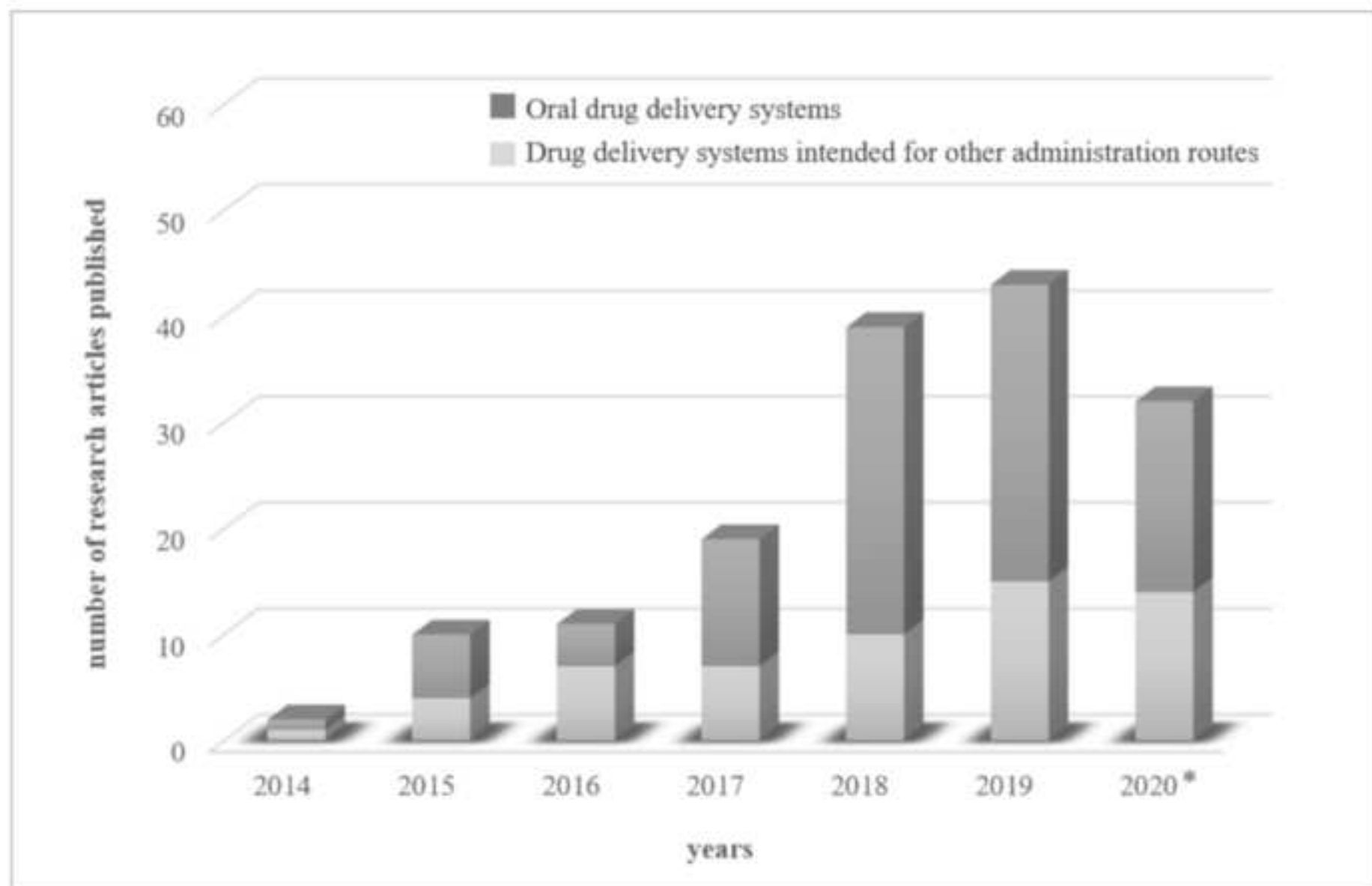


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Figure 2: Outline of key parameters involved in the quality of FDM drug products

Figure 3: Outline of FDM printing systems using granules/pellets as starting materials relying on (a) piston, (b) auger and (c) Freeformer technology (adapted from Welsh et al., 2019 and Ceskova and Lenfeld 2018).

Figure 1



* until July 20, 2020

Figure 2

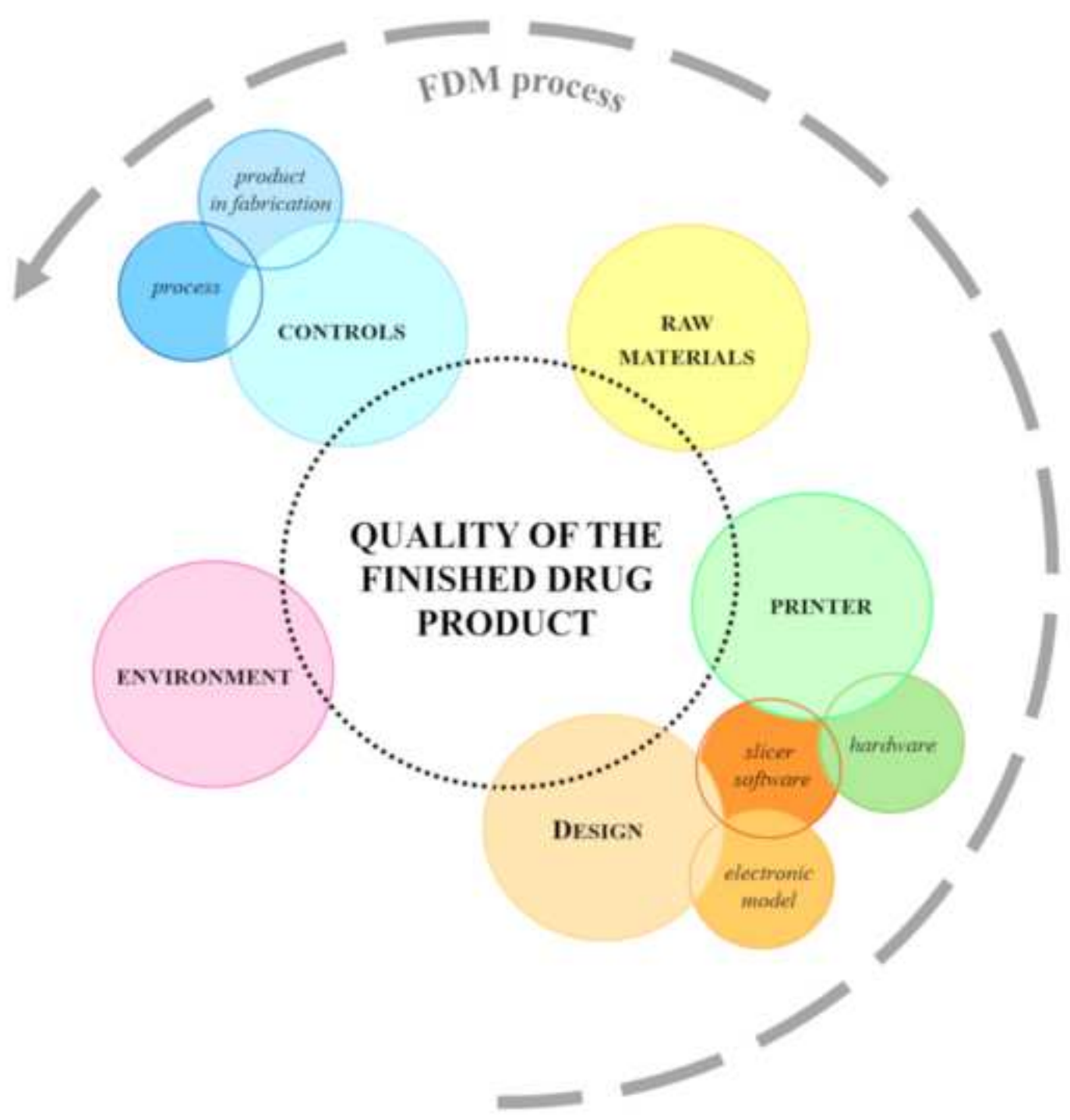
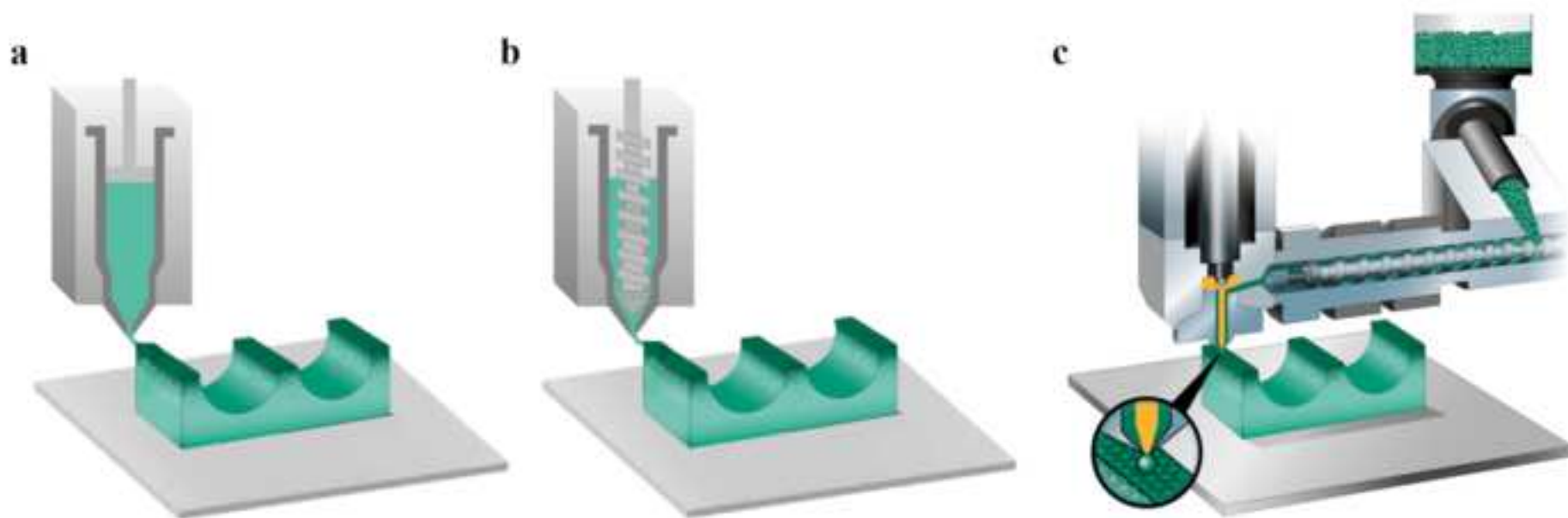


Figure 3



1 **Quality considerations on the pharmaceutical applications of fused deposition**
2 **modeling 3D printing**

3

4

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20 **DISCLAIMER**

21 This presentation reflects the views of the authors and should not be construed to represent the
22 FDA's views or policies.

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27 **Abstract**

28 3D printing, and particularly fused deposition modeling (FDM), has rapidly brought the possibility
29 of personalizing drug therapies to the forefront of pharmaceutical research and media attention.
30 Applications for this technology, described in published articles, are expected to grow significantly
31 in 2020. Where are we on this path, and what needs to be done to develop a FDM 2.0 process and
32 make personalized medicines available to patients? Based on literature analysis, this manuscript
33 aims to answer these questions and highlight the critical technical aspects of FDM as an emerging
34 technology for manufacturing safe, high-quality personalized oral drug products. In this
35 collaborative paper, experts from different fields contribute strategies for ensuring the quality of
36 starting materials and discuss the design phase, printer hardware and software, the process, the
37 environment and the resulting products, from the perspectives of both patients and operators.

38

39 **Keywords:** 3D printing, fused deposition modeling, drug product fabrication, quality, safety.

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72 **1. Introduction**

73 **1.1 Overview of 3D printing through 2020**

74 3D printing began officially in 1984, with the approval of the first stereolithography patent (Hull,
75 1986). However, this technology did not achieve widespread adoption for more than 10 years, as its
76 use was limited by numerous other patents
77 (https://www.wipo.int/edocs/pubdocs/en/wipo_pub_944_2015.pdf). Only after the patents'
78 expiration did desktop 3D printers become easily available on the market, resulting in the birth of
79 the consumer 3D printing community. Thereafter, the 3D printing industry, encompassing not only
80 companies employing printers but also those building them, grew very quickly. It is likely to reach a
81 market size of more than \$17 B in 2020 and is expected to increase to \$34.8 B by 2024
82 ([https://www2.deloitte.com/content/dam/Deloitte/de/Documents/operations/Deloitte_Challenges_of](https://www2.deloitte.com/content/dam/Deloitte/de/Documents/operations/Deloitte_Challenges_of_Additive_Manufacturing.pdf)
83 [_Additive_Manufacturing.pdf](https://downloads.3dhubs.com/3D_printing_trends_report_2020.pdf); https://downloads.3dhubs.com/3D_printing_trends_report_2020.pdf;
84 <https://www.grandviewresearch.com/industry-analysis/3d-printing-industry-analysis>;
85 <https://www.marketsandmarkets.com/Market-Reports/3d-printing-market-1276.html>;
86 <https://www.marketresearch.com/Expeditious-Research-v4071/3D-Printing-Outlook-9903905/>).

87 This expected continuous growth spurred venture capital funding of 3D printing-related startups,
88 which exceeded \$300 M in 2019.

89 In its evolution, 3D printing has shifted from being considered just a prototyping tool, to being
90 employed as the additive manufacturing (AM) method of choice for low-volume batches of high-
91 value products. For such products, the upfront investment in tooling required by subtractive
92 methods would not be cost-effective (Ford and Despeisse, 2016;
93 <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.1176.pdf>). Moreover, novel
94 interesting applications have been identified. These include printing of metals and electronics to
95 reduce assembly time and human labor in the manufacturing of sensors; generative design in the
96 fields of art, architecture, communication and product design (*i.e.*, a fast method to explore design

97 possibilities providing physical prototypes to simplify visualization); and 4D printing (*i.e.*, the
98 fabrication of objects capable of changing their shape in response to an external non-mechanical
99 stimulus) (Lukin et al., 2019; Maroni et al., 2019; Mehrpouya et al., 2019; Melocchi et al., 2019a;
100 Savolainen et al., 2020; Trenfield et al., 2019a).

101 Given the improvement of 3D printing and the widespread awareness that it can help connect
102 marginalized and difficult-to-reach populations with essential products, several industries (including
103 automotive, defense and healthcare) have begun to experience 3D printing-related production,
104 business and supply-chain transformations (Chan et al., 2018; Despeisse et al., 2017; Ghobadian et
105 al., 2020). In this respect, the percentage of companies using AM for specific production purposes
106 increased from 24% to 65% in 2019 ([https://assets.ey.com/content/dam/ey-sites/ey-](https://assets.ey.com/content/dam/ey-sites/ey-com/en_gl/topics/advisory/ey-3d-printing-game-changer.pdf)
107 [com/en_gl/topics/advisory/ey-3d-printing-game-changer.pdf](https://assets.ey.com/content/dam/ey-sites/ey-com/en_gl/topics/advisory/ey-3d-printing-game-changer.pdf);

108 [https://cdn2.hubspot.net/hubfs/5154612/downloads/Sculpteo_The%20State%20of%203D%20Printi](https://cdn2.hubspot.net/hubfs/5154612/downloads/Sculpteo_The%20State%20of%203D%20Printing_2019.pdf)
109 [ng_2019.pdf](https://cdn2.hubspot.net/hubfs/5154612/downloads/Sculpteo_The%20State%20of%203D%20Printing_2019.pdf)). At the same time, the news media started to pay great attention to 3D printing and to
110 incorporate it into the concepts of the fourth industrial revolution and a new manufacturing
111 renaissance (Baines et al., 2019; Berman, 2012; Garret 2014; Prince, 2014).

112 Despite the initial enthusiasm about 3D printing technology, its actual application potential in
113 different industries is only now beginning to be tested in depth (Achillas et al., 2015; Anton et al.,
114 2014; Bogers et al., 2016; Culot et al., 2019; Garmulewicz et al., 2018; Huang et al., 2013; Kleer et
115 al., 2019; Mir and Nakamura, 2017; Petrick and Simpson, 2013; Rehnberg and Ponte, 2016; Tran
116 2017; Yao and Lin, 2015). In particular, due to a few technological bottlenecks such as production
117 speed, as well as cost and labor associated with pre- and post-printing operations, 3D printing
118 currently is filling a niche as a complement to other existing manufacturing processes. In this
119 context, the unique capabilities of 3D printing in terms of on-demand and delocalized production,
120 product customization and realization of complex designs might find their full application.

121

122 **1.2. 3D printing for precision medicine**

123 In parallel with the increasing attention to 3D printing in many different areas, scientists have been
124 investigating its suitability for the manufacturing of drug products enabling precision medicine, for
125 the treatment of subpopulations with specific needs even of a single patient (*i.e.* personalized drug
126 products) (Alhnan et al., 2016; Economidou et al., 2018; Jamróz et al., 2018a; Kjar and Huang,
127 2019; Musazzi et al., 2020; Trenfield et al., 2018a, b; Zhang et al., 2018). Indeed, the concept of
128 precision medicine, an emerging approach regarding treatment and prevention of illness that
129 accounts for each individual's genes, environment and lifestyle, is completely transforming the
130 healthcare field (Collins et al., 2016; <https://ghr.nlm.nih.gov/primer/precisionmedicine/definition>;
131 [https://www.fda.gov/drugs/precision-dosing-defining-need-and-approaches-deliver-individualized-](https://www.fda.gov/drugs/precision-dosing-defining-need-and-approaches-deliver-individualized-drug-dosing-real-world-setting)
132 [drug-dosing-real-world-setting](https://www.fda.gov/Drugs/NewsEvents/ucm132703.htm); <https://www.fda.gov/Drugs/NewsEvents/ucm132703.htm>;
133 Lamichhane et al., 2019; Mirza and Iqbal, 2018; Rahman et al., 2018). For instance, the importance
134 of genomics has been highlighted in clinical decision making and for identifying optimal
135 pharmacological treatments (Alomari et al., 2015; Kaae et al., 2018; Menditto et al., 2020;
136 Radhakrishnan et al., 2020). However, an unmet need exists in the caring cycle for drug products
137 tailored to the variables identified as crucial for a specific subject. In this respect, 3D printing is
138 described as one of the most cost-effective alternatives for moving from mass production (*i.e.*, a
139 one-size-fits-all approach) to fabrication of small batches that are not all the same (Aquino et al.,
140 2018; Awad et al., 2018; Chandekar et al., 2019; Fastø et al., 2019; Goole and Amighi, 2016;
141 Goyanes et al., 2017; Kjar and Huang, 2019; Liang et al., 2019). Indeed, 3D printing would enable:
142 *i*) personalization of the amount of active ingredient in a drug product, *ii*) achievement of high drug
143 loads, *iii*) co-administration of drugs in the same dosage form, *iv*) avoidance of the use of specific
144 excipients in cases of intolerance, *v*) modulation of the release kinetics of drugs, and *vi*) definition
145 of the flavor and other aspects of drug products in order to improve patient compliance, for instance
146 favoring swallowability, especially from a psychological point of view. Adjustments and
147 modifications needed would be made possible by real-time changes in the digital models of

148 products and process parameters (*e.g.*, number of shells, infill percentage, layer overlap), as
149 discussed extensively in the recent literature (Trenfield et al., 2018a, b, 2019; Joo et al., 2020;
150 Norman et al., 2017; Zema et al., 2017). A new and exciting possibility with AM is the
151 manufacturing of medicines on demand and at the point of care, thus removing the need for long-
152 term storage and stability studies. In addition, 3D printing can easily be adapted to fulfill the need
153 for continuous manufacturing, taking advantage of the limited space required to set up a production
154 facility (Cunha-Filho et al., 2017; Desai et al., 2017; Mascia et al., 2013; Melocchi et al., 2015a;
155 Puri et al., 2017; Zhang et al., 2017a). In this respect, it may be possible to implement an innovative
156 AM-based approach to larger-scale production.

157 The availability of customized drug products not only would decrease healthcare system expenses
158 associated with side effects and hospitalization, but it also may be of utmost importance for patients
159 with special needs (Norman et al., 2017; Hsiao et al., 2018). These patients include, in particular,
160 those affected by rare diseases, children, the elderly, the poor or the high metabolizers, individuals
161 with illnesses affecting elimination organs and people taking multiple medicines. Indeed,
162 concomitant use of numerous prescription drugs, or polypharmacy, has largely increased in recent
163 years. Combination products, in addition to enhancing patient adherence, also have the potential to
164 extend patency on the drugs involved and improve cost-effectiveness by creating a single product
165 pipeline. This would reduce the costs associated with packaging, prescribing and dispensing.
166 Moreover, the use of 3D printing can also facilitate the formulation of molecules that may interact
167 by separating them into different compartments within the same product.

168 Finally, 3D printing may become an effective tool in the near future for developing telemedicine
169 (Araújo et al., 2019; Johnson and Brownlee, 2018; Wang and Kricka, 2018; Wen, 2017). This is
170 defined as the remote delivery of healthcare services (*i.e.*, consultation, diagnosis, intervention,
171 monitoring and education) by taking advantage of communication technologies whenever
172 physicians and patients are not physically close. Telemedicine could advantageously be integrated
173 with other technological advancements, such as smart health monitors, mobile applications and

174 cloud-based computing, which would allow physicians to evaluate patient health in real-time and to
175 collect any data about modifications of the status quo. Telemedicine could also provide a tool to
176 enable the adjustment of the pharmacological treatment when needed. In this respect, an FDM
177 printer, supplied with the necessary raw materials and remotely controlled, may become a crucial
178 element in making home therapy possible.

179 Despite the great potential for 3D printing to change current treatment strategies, only one 3D-
180 printed drug product is on the market, which was registered after years of research aimed at making
181 the technology suitable for mass manufacturing. In fact, Spritam, was approved by the U.S. Food
182 and Drug Administration (FDA) in 2015 only. It was manufactured by the binder jetting technology
183 proposed in the late 1980s in the labs of the Massachusetts Institute of Technology and then fully
184 developed by Aprelia Pharmaceuticals (Alhnan et al., 2016;
185 <https://www.spritam.com/#/hcp/zipdose-technology/what-is-zipdose-technology>). Consequently,
186 Spritam fast-dissolving tablets, with an increasing load of levetiracetam, were approved through a
187 traditional regulatory pathway (Goole and Amighi, 2016; Boudriau et al., 2016; Preis and Öblom,
188 2017). Some of the challenges of producing 3D-printed personalized drug products include
189 difficulties in generating real-world evidence during the new drug development process to support
190 precision dosing and the application of individualized dosing regimens in clinical practice.

191 In addition, a specific regulatory framework for assessing the quality and safety of personalized
192 medicine is lacking. Indeed, the conventional approach of quality assurance would hardly apply in
193 this respect (Khairuzzaman, 2018). For example, quality controls (*e.g.*, content uniformity, weight
194 uniformity, dissolution rate) established in traditional manufacturing based on sampling units from
195 each batch and evaluating them for critical parameters, while retaining at least twice the quantity
196 necessary to perform all the required tests, would be difficult to apply to personalized products. In
197 this case, the result would be numerous batches, each consisting of a few units and each differing
198 from the others. Therefore, new strategies to ensure quality of the starting materials, robustness of
199 the printing process, and specification of finished product should be developed by the

200 pharmaceutical industry and assessed by regulators for suitability. In this context, newly-on-the-
201 market startups involved in the manufacturing of 3D printed products could play a pivotal role
202 because they benefit from greater flexibility, cutting-edge approaches and an application-specific
203 focus.

204 In recent years, the research community has focused their interest on investigating the feasibility of
205 3D printing in manufacturing a range of customizable dosage forms and drug delivery systems
206 (DDSs). They considered not only binder jetting, but also extrusion printing, encompassing gel
207 deposition and fused deposition modeling (FDM), selective laser sintering and stereolithography
208 techniques. Among those technologies, the last probably was the most challenging, as evidenced by
209 the limited number of applications proposed in the scientific literature. This could be associated
210 with the need for using photosensitive polymers to build up the item structure layer by layer. These
211 polymers need to be cured upon irradiation with UV light, which would hardly fulfill the safety and
212 quality requirements of drug products.

213 Based on the analyses of the scientific literature published so far, FDM was found to be the most
214 studied 3D printing technique (Lamichhane et al., 2019; Gioumouxouzis et al., 2019). Indeed, the
215 number of research articles increased from fewer than five in 2014 to almost forty in 2019, with a
216 growth trend confirmed for 2020 and an evident focus on the oral route of administration (Figure 1).
217 This phenomenon could be explained by the similarity of FDM to other hot processing techniques
218 already known in the pharmaceutical industry, for example hot melt extrusion (HME), and the
219 possibility of using thermoplastic polymers commonly employed in the formulation of drug
220 products (Norman et al., 2017; Thakkar et al., 2020; Zema et al., 2012, 2017). Moreover, the cost-
221 accessibility of desktop FDM equipment and the possibility of modifying it were key factors
222 favoring its adoption. Analyzing the available scientific literature, in the following sections we
223 made an effort in this critical overview to highlight all aspects that should be addressed before
224 implementing FDM in the fabrication of personalized drug products for human use, which could
225 correspond with the beginning of a new FDM era we named FDM 2.0. Notably, we purposely

226 focused solely on the oral route, which allows us to circumvent at least those issues associated with
227 sterility.

228

229 **2. Technology implementation challenges of FDM**

230 The FDM process involves deposition of softened/molten material layers that are fused together in a
231 controlled pattern to create a 3D object, following its digital model. The material is generally fed
232 into the FDM equipment in the form of a filament, with defined size and thermo-mechanical
233 characteristics, fabricated by HME starting from a thermoplastic polymer (Araújo et al., 2019; Aho
234 et al., 2019; Azad et al., 2020; Long et al., 2017; Palo et al., 2017; Konta et al., 2017; Zema et al.,
235 2017). The filament is then heated in the 3D printer and extruded onto the build plate through the
236 nozzle. Objects produced by FDM are generally characterized by good mechanical resistance,
237 except for highly porous structures that may be friable. On the other hand, surface smoothness often
238 needs to be enhanced eventually through post-processing operations, as the layer deposition pattern
239 often can be evident and might affect user compliance. Resolution of details also can be an issue,
240 particularly when these are geometric features critical to the printed item's performance (*e.g.*,
241 thickness of a release-modifying coating layer, overlapping parts of capsule closure).

242 According to the analyzed literature, FDM was initially investigated for its intrinsic suitability for
243 low-volume production of traditional orally-administered dosage forms such as tablets, capsules and
244 matrices). This was translated to the fabrication of personalized medicines (Algahtani et al., 2018;
245 Awad et al., 2018; Cunha-Filho et al., 2017; Tan et al., 2018). In this respect, the main advantages
246 of FDM resemble those already identified for other hot-processing techniques, such as the lack of
247 solvents, which both reduces overall time and cost of the manufacturing process and is beneficial to
248 product stability (Zema et al., 2017). Moreover, the operating temperatures limit microbial
249 contamination and promote drug-polymer interaction with the formation of solid dispersions,
250 possibly leading to better bioavailability of the active pharmaceutical ingredient (API).

251 On the other hand, temperatures could impact the drug and excipient chemical stability and the
252 physical stability of the finished item (*e.g.*, presence of byproducts, shrinkage and warpage
253 phenomena). In a narrow and more advanced set of applications, FDM also was tested as a rapid
254 prototyping tool with respect to other processes that are more suitable for mass manufacturing, for
255 example injection molding (IM) (Melocchi et al., 2015b; Maroni et al., 2017; Shin et al., 2019).
256 Currently, FDM is undergoing a reevaluation for the fabrication of DDSs with increasing design
257 complexity (*e.g.*, coated, hollow, pierced, multilayered and with gradient composition) and
258 performance (*e.g.*, combined-release kinetics, shape memory response), using the same equipment,
259 possibly in a single production step (Genina et al., 2017; Joo et al., 2020; Matijašić et al., 2019a;
260 Melocchi et al., 2020a,b). Indeed, this would hardly be achievable by employing other production
261 methods. In addition, some of the new proposed systems target either novel or uncommon
262 therapeutic needs (*e.g.*, microneedles for transdermal drug delivery, biodegradable prolonged-
263 release projectiles for administration of contraceptives to wildlife) as well as administration routes
264 (*e.g.*, topical, vaginal, rectal, intraauricular, intragastric and intravesical) (Fu et al., 2018; Liang et
265 al., 2018; Lim et al., 2018; Long et al., 2018; Luzuriaga et al., 2018; Melocchi et al., 2019b; Tagami
266 et al., 2019).

267 Extemporaneous 3D printing by FDM within pharmacies was initially described in the scientific
268 literature as a way to make personalized drug products available (Araújo et al., 2019; Jamróz et al.,
269 2018a; Lind et al., 2016; Prasad and Smyth, 2016; Rautamo et al., 2020)]. In this environment,
270 FDM would increase not only the variety of products that could be prepared (*e.g.*, controlled-release
271 DDSs), but also their reproducibility, thanks to the intrinsic automation of the 3D printing process.
272 This approach was proposed as it could in principle take advantage of *i)* the presence of educated
273 staff, *ii)* the already-regulated possibility of preparing extemporaneous medicines tailored to single
274 patients, and *iii)* the well-established system for dispensing drug products. However, it could result
275 in poor quality control for these more complex finished products, in view of the limited
276 resources/instrumentations available within compounding and hospital pharmacies.

277 On the other hand, the chance to decentralize printing infrastructures (*i.e.*, the availability of printers
278 to fabricate medications at home and in small clinics; these printers would be operated either by the
279 patients themselves or remotely/in person by healthcare professionals other than pharmacists) might
280 not be feasible, as it would raise issues not only of quality but also of responsibility (Trenfield et al.,
281 2018a). Currently, such issues can be better addressed in an industrial-like environment, which
282 generally is characterized by a quality-oriented mindset. By way of example, this results in, the
283 enforcement of standard operating procedures, the presence of trained and continuously updated
284 personnel, the possibility of performing an increased number and a wider range of quality control
285 tests. However, even considering this approach to the production of personalized pharmaceuticals,
286 concerns about differing social and/or regulatory impact and relevant questions remain that need to
287 be answered, such as the following (Mirza and Iqbal, 2018; Kaae et al., 2018; Awad et al., 2018;
288 Preis and Öblom, 2017):

289 *i)* Should all patients have access to personalized products, or should they be available only to
290 people with identified special needs?

291 *ii)* If the 3D printing of drug products were to be implemented within a pharmacy, would this
292 be an optional or a mandatory service?

293 *iii)* In the case of at-home printing, what would happen if patients were to unintentionally print
294 in a wrong way, or if they decided to print too many drug products for selling/abuse
295 purposes?

296 *iv)* How could counterfeiting issues be prevented?

297 *v)* Who would be responsible for the finished product quality and its evaluation?

298 *vi)* In the case of combination products, how would manufacturers address side effects possibly
299 related to a combination of multiple active ingredients that either were not previously in the
300 same product or have been combined, but in different doses?

301 To find solutions, increasing awareness of these issues among domain experts and establishing
302 multidisciplinary collaborations will be necessary.

303 Quality, regardless of where the personalized product ultimately is manufactured, is of paramount
304 importance, both from patients' and operators' perspectives. In this respect, control of all the
305 variables involved in the fabrication of drug products by FDM will play a pivotal role (Figure 2).
306 Indeed, the quality of the final product will depend on the design phase of the dosage form, slicing
307 parameters, starting materials and software settings, as well as mechanical performance achievable
308 by the printers and on the environmental conditions at the production site. Based on these
309 considerations, all abovementioned aspects will be discussed in depth in the following sections.

310

311 **2.1. Geometric design of the product**

312 Product design and all iterations needed to fabricate customized medicines should be carried out
313 through an appropriate computer aided design (CAD) suite enabling the 3D representation of
314 objects in a file format, which can then be transformed into instructions for the printer (*i.e.*, .stl file)
315 (Zhang et al., 2018; Heikkinen et al., 2018; Junk and Kuen, 2016). Currently, a large variety of
316 commercial and non-commercial CAD systems with a range of licensing features and computing
317 requirements are available. The selection of the CAD software generally is a trade-off between ease
318 of use (*i.e.* easy and intuitive operability) and scope of function (*i.e.*, range of available geometric
319 features and the possibility of modifying them afterwards). Most high-performance CAD systems
320 also allow simulations, enabling the reduction of prototyping needs and physical testing costs by
321 identifying and correcting possible issues during the core design phase. Some of these software
322 suites are tailored for use in specific fields, such as automotive and aerospace (Cicconi et al., 2018;
323 Hirz et al., 2017). However, users need to complete comprehensive training and accumulate years
324 of experience before being able to fully benefit from and master all of the functionalities (Chester,
325 2007; Ye et al., 2004). Actual printing then requires a .stl file, generally written in a binary format,
326 which specifies the x, y and z coordinates of the vertices of the triangular elements adapted to
327 approximate the surface of the object in the so-called tessellation process (Adhikary and

328 Gurumoorthy, 2018; Leong et al., 1996a,b; Liu et al., 2009; Livesu et al., 2017; Ma et al., 2001;
329 Manmadhachary et al., 2016; Rypl and Bittnar, 2006). Notably, the more detailed and complex the
330 digital model, and the higher the accuracy sought for fabrication, the more triangular elements the
331 program will use to create its representation. The main advantages associated with the .stl file are its
332 simplicity and independence from the 3D software and the AM process employed. For many
333 shapes, this file format can provide an effective and accurate model.

334 This approach, however, is very limited in the functionality it supports. For example, duplicating
335 vertices and edges results in a high degree of redundancy. In the case of electronic models with
336 smooth curves, thousands of triangles may be required to represent the shapes with sufficient
337 accuracy/precision. Moreover, complex geometries, as for example pierced or encompassing hollow
338 parts, often have led to defective .stl files that are time-consuming to fix. Similarly, the tessellation
339 process can be challenging, leading to the formation of gaps and holes in the cross-sections of the
340 model, which impair the deposition of continuous layers. Many repair tools have been developed to
341 improve the generation of .stl files and reduce errors, although their use always entails a trial-and-
342 error approach.

343 Finally, the file encoding the entire surface geometry of the object is processed by slicer software to
344 convert the model into a series of thin layers and produce the associated G-code, *i.e.*, a series of
345 instructions written in a numerical control programming language that should, in principle, be
346 tailored to a specific printer (Leong et al., 1996a,b). Indeed, the FDM equipment follows the G-code
347 to fabricate successive layers of material and additively build the item through a series of cross-
348 sections from the CAD model. Currently, a variety of available slicing tools, both open-source and
349 proprietary, are available. Evaluating their advantages and disadvantages when used with specific
350 equipment and materials is ongoing in the desktop 3D printing community. Such an approach also
351 would be worth implementing in the pharmaceutical field, considering the possible impact of the
352 thermomechanical characteristics of the formulation on the selection of slicing parameters.

353

354 **2.2 FDM equipment**

355 FDM printers, like any other machine used in pharmaceutical manufacturing, should comply with
356 current good manufacturing practices (cGMP)
357 (<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=211>). Indeed,
358 as per CFR 21 Part 211 Section 211.63 “equipment used in the manufacturing, processing, packing,
359 or holding of a drug product shall be of appropriate design, adequate size, and suitably located to
360 facilitate operations for its intended use and for its cleaning and maintenance.” Moreover, these
361 machines should be built so that the surfaces that contact components, in-process materials, or
362 finished products should not be reactive, additive or absorptive so as to alter the safety, identity,
363 strength, quality or purity of the drug product beyond the official or other established requirements.
364 Currently, commercially available 3D printers, which generally are those used in research
365 applications, hardly meet the cGMP regulations, and thus may render the 3D printed drug products
366 unsafe for human consumption. Consequently, a limited number of publications have focused on
367 the *in vivo* performance of 3D printed medicines, mainly on those orally administered (Arafat et al.,
368 2018; Charoenying et al., 2020; Genina et al., 2017; Goyanes et al., 2018; Scoutaris et al., 2018;
369 Shin et al., 2019). To overcome such limitations, preliminary attempts to attain equipment
370 compliance recently have been described (Araújo et al., 2019;
371 https://www.fabrux.co.uk/technologies/?utm_term=0_13f427b78b-78b91812b1-41694769; Melocchi
372 et al., 2018). Many involved with 3D printing of medicines are still developing their knowledge
373 base on this topic. Most manufacturers that currently design and build 3D printers have relatively
374 limited experience in pharmaceutical manufacturing and need to deepen their knowledge of specific
375 strategies in this area (Lamichhane et al., 2019)]. Collaboration among engineers with different
376 backgrounds, overseen by regulators, could be helpful in this regard.

377 The quality of a final product depends not only on the printing settings but also on the ability of the
378 printer to execute them consistently so that both software and hardware play pivotal roles (Livesu et
379 al., 2017; Feuerbach et al., 2018; Roberson et al., 2013; Šljivic et al., 2019). As was mentioned

380 previously, slicers are responsible for the conversion of the electronic model of the object into
381 elaborated G-code, which serves as instructions for the printer. The latest software suites have setup
382 configurations dedicated to specific printers and can manage many parameters independently,
383 enabling the tuning of many details of the printing process in a way that determines the printing
384 time and the quality of the finished product. Validation of the software *per* the Part 11 and 21 CFR
385 211.68 would also be key components of meeting the CGMPs requirements
386 (<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?fr=211.68>;
387 <https://www.fda.gov/media/75414/download>). Although developing new slicer software could make
388 it possible to precisely set an even larger variety of parameters, the real limiting step is in the ability
389 of the hardware to precisely execute the settings. In fact, the construction materials, the geometry of
390 different parts and their assembly (including engineering design and tolerance stacks), are
391 responsible for the precision of the response of the FDM machines to software commands. In this
392 respect, there are important differences between printers specifically developed for industrial
393 production and desktop printers for customer use. The former initially were developed in the field
394 of plastics manufacturing as a powerful alternative to IM presses, enabling the fabrication of
395 complicated geometries while maintaining repeatable quality. For these reasons, they were designed
396 from scratch to guarantee a certain level of performance, mainly working with high-quality
397 materials and proprietary closed-source software. These characteristics are impediments to the
398 operator's ability to make adjustment and also make the equipment very expensive and strictly
399 related to specific applications, both in terms of materials employed and its scope of use.

400 As a result of these limitations, desktop FDM printers have drawn a lot of interest. They were
401 derived from the industrial printers by simplifying both the hardware; for instance, in their structure,
402 materials and the internal electronics, with the main objective of making them much more
403 economical. Simplification of the hardware, however, caused a loss of mechanical performance,
404 decreasing the tolerances and lowering the resolution of the objects printed. Initially, such a
405 reduction in the FDM outcome was not considered a big limitation by the consumer community

406 compared to the possibility of making the technology more affordable, and thus available to a wider
407 variety of users. Indeed, the cost reduction played a key role in the widespread adoption of FDM
408 technology, encouraging consumers to also be developers of new materials and products, including
409 pharmaceuticals. Notably, the growing interest in personalized medicine, coupled with the low cost
410 of desktop equipment, created fertile ground for the realization of FDM's potential. However, after
411 a promising initial exploration phase, the limitations became more evident. In this respect, the main
412 issues were associated with the degree of resolution and with the reproducibility of the printing
413 process itself.

414 The requirements for final products are currently pushing standard desktop printers to their limits,
415 demonstrating the drawbacks of the cheaper equipment in meeting the needs of pharmaceutical
416 manufacturing. In fact, when dealing with DDSs, tolerances of tenths/hundreds of microns become
417 crucial to product performance over time (Melocchi et al., 2020a). Some important restrictions need
418 to be addressed in view of the low-budget printer hardware's poor mechanical precision; for
419 instance, by identifying their true achievement potential for a piece of equipment, *i.e.*, the ratio of a
420 nominal software setting to the real output value. Table 1 is a matrix of the core parts of commercial
421 desktop FDM equipment, analyzing their features, issues and possible improvements/insights.

422

Table 1: Function, features, issues and possible improvements/insights relevant to core parts of the FDM equipment currently in use.

| | FUNCTION | FEATURES | ISSUES | IMPROVEMENTS/INSIGHTS |
|---------------------|--|---|---|---|
| CHASSIS | <ul style="list-style-type: none"> - Holds the equipment - Determines the shape of the printing chamber - Locates the electric motors and control electronics - Acts as a guide for all the moving parts | <ul style="list-style-type: none"> - Consists of extruded bars of round section made of basic steel (balance between cost, resistance, straightness and weight) <i>Equipment examples:</i> makerbot replicator ii, prusa i3, duplicator i3, ultimaker - Comprises coupling parts with high tolerances <i>Equipment examples:</i> Makerbot replicator II (<i>e.g.</i> The building plate position is set manually by screws and springs) | <ul style="list-style-type: none"> - Vibrations, deflections and oscillations during the nozzle/printing head movements - Unstable printing conditions due to absence of isolation from the external environment | <ul style="list-style-type: none"> - Using more rigid and expensive material (<i>e.g.</i> Grounded tempered steel) - Implementing an isolated, heated and closed chamber to stabilize the conditions of the printing area <i>Equipment examples:</i> Kloner twin, Davinci series |
| MOVING PARTS | <ul style="list-style-type: none"> - Stepper motors connected to a single endless screw for the movement in the z axis - Stepper motors connected to pulley-belt transmission for the movement on x and y axes <i>Equipment examples:</i> Ninjabot, Zmorph, UP plus, Makerbot replicator <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> - Stepper motors connected to belts and brackets for the movement on x, y and z axes <i>Equipment examples:</i> Kloner twin, Delta wasp | <ul style="list-style-type: none"> - Rigidity and straightness - Presence of intermediate parts <ul style="list-style-type: none"> - Mechanical connections to convert force in the actual x- and y-axis translation (belt-mediated transmission) - A single mechanical connection coupling moving parts to only one end of the endless screw <i>Equipment examples:</i> Printrbot simple metal, Lulzbot taz | <ul style="list-style-type: none"> - High tolerances in coupling between transmission components and loose connections - Deviations between the pulling value given by the code and the actual movement of the parts - Oscillations - Non-linear loss of force in the translation of the endless screw movement - Uncontrolled cooling of the material due to ventilation phenomena <ul style="list-style-type: none"> - Unreleased tensile forces inside the printed object, leading to shrinking, cracking, deflection, fragility, layer detaching and mismatch with designed dimensions | <ul style="list-style-type: none"> - Improving assembly including tighter tolerances - Reducing number of intermediate parts - Using double joints on the two ends of the endless screw - Using backlash for the mechanical connection between the screw and the arm - Limiting as much as possible the reciprocal motion of the parts - Implementing an isolated, heated and closed chamber to stabilize the conditions of the printing area |

| | | | | |
|----------------------|--|---|--|---|
| ELECTRONICS | <ul style="list-style-type: none"> - Regulate movements and temperature | <ul style="list-style-type: none"> - Low-performance and low-budget electronics | <ul style="list-style-type: none"> - Instability in temperature control - Oscillation in positioning of the moving elements | <ul style="list-style-type: none"> - Increasing processor computing power |
| PRINTING HEAD | <ul style="list-style-type: none"> - Extrusion of the material | <ul style="list-style-type: none"> - Composed of: <ul style="list-style-type: none"> - Heating block, containing thermal resistor for increasing the temperature and thermocouple for temperature control; - Nozzle, <i>i.e.</i> A metallic channel composed of <ul style="list-style-type: none"> - A steel or aluminum cold end, where the filament is gripped by a gear placed on a motor and is pulled down in the hot end - An aluminum or brass hot end directly in touch with the heating block, allowing the thermal exchange needed to soften/melt the material and the relevant extrusion through a calibrated orifice - Parts made of different materials and adapted from existing components coming from other fields (<i>e.g.</i> brass nozzles are those used in gas plants) | <ul style="list-style-type: none"> - Gears with limited ability to generate pressure and to force the material through the nozzle - Variable and uncontrollable thermal exchange <ul style="list-style-type: none"> - Stability issues (<i>e.g.</i> Depolymerization, carbonization, degradation) - Inadequate melting of the material in the hot end with relevant clogging of the nozzle - Softening of the material in the cold end leading to filament erosion or sticking to the gear, thus compromising the control of the amount of extruded material | <ul style="list-style-type: none"> - Using custom-designed parts - Using compatible materials (in terms of thermal exchange) for interconnected parts - Improving the feeding mechanism to allow the generation of greater pressures |

424

425

426 As we discuss more extensively in the next section, attempts to overcome limitations encountered in
427 the FDM process generally were made by tuning material behavior to adapt to the printer setup
428 instead of empowering the machinery. However, some attempts to use already well-known
429 technologies like piston-based extruders and auger conveyors have been proposed to move FDM
430 printers beyond filament-based processes (Figure 3a, b) (Fanous et al., 2020; Goyanes et al., 2019;
431 Musazzi et al., 2018; Ong et al., 2020) . This would enable the machines not only to overcome
432 specific issues related to raw materials, but also to avoid one of the two hot-processing steps
433 required by current FDM printers, removing at least the need for filament production. In particular,
434 the power and robustness of the abovementioned setups might be rapidly adapted to 3D printing
435 hardware, allowing operators to feed the machine with many grades of raw material, in the form
436 either of granules/pellets or powders (Guo et al., 2019). Although skipping the use of filaments
437 represents a significant improvement, in most reviewed cases this was still achieved with custom
438 adjustments to commercial printers. On the other hand, when dealing with pharmaceutical
439 processes, many further improvements are required: for instance, the ability of the device to
440 effectively mix, plasticate and achieve steady flow of the homogeneous melt through the nozzle. In
441 this respect, few researchers have investigated the use of more expensive industrial FDM
442 equipment, comparing the characteristics of the final products with those obtained by other mass
443 manufacturing processes, such as IM (Welsh et al., 2019). The Freeformer equipment employed is
444 derived from the IM technology traditionally used in the plastics industry to process polymeric
445 granules/pellets (<https://www.arburg.com/products-and-services/additive-manufacturing/>; Ceskova
446 and Lenfeld, 2018). It was initially implemented with separate material preparation units and other
447 specific tools for the fabrication of medical devices in agreement with ISO 13485 standards. The
448 Freeformer, based on a droplet deposition modeling technique, can operate at temperatures and
449 pressures greater than 300 °C and 400 bar, respectively, being particularly suitable for viscous melts
450 (Figure 3c). It is equipped with servo motors and a never-ending screw for material preparation,
451 precise linear axes for the micrometer positioning of the part carrier, and a closed air/ventilation

452 system for ensuring uniform temperature control in the heated build chamber. One of its main
453 differentiation elements from desktop FDM printers is the presence of a piezo controlled nozzle to
454 finely control the flow of material as a continuous strand of droplets. As each layer would be
455 composed of a number of these droplets, a higher level of control of shape and morphology as well
456 as density - impacting overall performance of the printed drug product - would be assured. With
457 freedom in adjusting slicing and process parameters an undeniable advantage of new FDM printers,
458 the Freeformer software was designed as an open system in which the user can fine-tune the
459 conditions to different formulations. Moreover, the extruder assembly can be disassembled for
460 cleaning, and all the parts in contact with the in-process material can be changed. In this respect, it
461 should be stressed that the central problem is still that actual FDM equipment available on the
462 market is generally very far from being standardized for fabricating medicines. Indeed, it lacks
463 many industrial-grade requirements, due to the absence of: *i)* a printing environment well isolated
464 from either the external environment or contaminants, such as lubricants and oils coming from the
465 moving parts; *ii)* the entire assembly made of compliant materials and designed to be safely
466 disassembled for cleaning and maintenance, including parts dedicated to the processing of specific
467 materials; *iii)* the evaluation of any possible contaminants released during a single process and
468 along the entire life of the machine; and *iv)* standards of process-process and printer-printer
469 reproducibility.

470

471 **2.3 Raw materials**

472 A strict control on the characteristics of raw materials may be applied to ensure the quality of the
473 FDM process and the safety of the printed products (Awad et al., 2018; Joo et al., 2020; Jain et al.,
474 2018). With FDM 3D printing, the most common form for raw materials is currently represented by
475 filaments prepared by HME. Depending on the intended use, filaments may be formulated starting
476 from a thermoplastic polymer either adding only processing adjuvants and release modifiers, or also

477 drugs (Hsiao et al., 2018; Melocchi et al., 2016). While in the latter case monolithic dosage forms
478 (either having immediate or modified release performance) would be printed, in the former case,
479 shells, coatings or separating structures may be fabricated to be combined with drug-containing
480 parts.

481 Initially, researchers resorted to polymeric filaments already available on the market, loading the
482 active ingredients from solutions by soaking or by re-extrusion (Goyanes et al. 2014, 2015a, b, c;
483 Saviano et al., 2019; Skowyra et al., 2015). However, the main drawbacks of the former process were
484 the limited drug loading (< 2%), swelling of the filament during immersion, and shrinkage after
485 drying. Re-extrusion instead enabled incorporation of relatively higher amounts of drug. Moreover,
486 resorting to re-extrusion enabled the preparation of solid dispersions with an improvement in the
487 dissolution rate of poorly soluble drugs (Jamróz et al., 2018b; Sandler et al., 2014; Solanki et al.,
488 2018). Subsequently, the research focus shifted on evaluating the possibility of preparing filaments
489 by HME starting from pharmaceutical-grade polymers (Alhijaj et al., 2015; Genina et al., 2016;
490 Holländer et al., 2016; Melocchi et al., 2016). In the frists attempts, simple equipment was tested, for
491 instance, machinery that allow the recycling of plastics (*e.g.*, Filabot). Afterwards, more
492 sophisticated single- and twin-screw extruders (*e.g.*, HAAKE MiniLab and Process 11 parallel
493 twin-screw extruder by Thermo Scientific) were evaluated.

494 The feeding material (*i.e.* the thermoplastic polymer-based formulation undergoing HME) is of
495 primary importance; as a matter of fact, the need for pharmaceutical-grade ingredients greatly limits
496 the type of polymers that can be used. Even when thermoplastic polymers approved for
497 pharmaceutical use can be identified as suitable candidates, a further requirement comes from the
498 need for the material to flow through the printer nozzle at temperatures that will not cause the
499 degradation of any of the components, *i.e.*, the polymer, the API and other excipients (Aho et al.,
500 2019; https://www.fabrux.co.uk/technologies/?utm_term=0_13f427b78b-78b91812b1-41694769)
501 [84,130]. This often requires the addition of plasticizers, capable of decreasing the viscosity of the
502 raw materials and making them printable at suitably low temperatures (Kempin et al., 2018;

503 Kollamaram et al., 2018; Pereira et al., 2019; Pietrzak et al., 2018). Indeed, the plasticizer reduces
504 the process temperature of the polymer in use and also acts as a softener for the solid filament. This,
505 however, may impair the feeding of the filament into the nozzle of the FDM printer. Therefore, a
506 trade-off between the reduction in melt viscosity at printing temperature and the maintenance of
507 stiffness of the solid filament at feeding - typically room-temperature - is always needed. Besides
508 the need to check that the composition of the filament is homogeneous (particularly when
509 containing a drug either dissolved or suspended), the material itself must fulfill several contrasting
510 requirements to ensure printability as well as quality and safety of the final product (Aho et al.,
511 2019). For example, after deposition from the printer nozzle, the material must solidify fast enough
512 to sustain the weight of upcoming layers but slow enough to allow interdiffusion between adjacent
513 layers, thus ensuring cohesion and structural integrity of the printed product. These opposite
514 requirements are associated with the polymer's thermal behavior and diffusivity, respectively, with
515 the latter ultimately correlated to its melt-viscosity. In this respect, Table 2 lists the most important
516 requirements for each phase of the FDM process and the actions to be taken to fulfill them, along
517 with the material/filament properties involved. Specific methods proposed in the literature for their
518 characterization are also reported.

Table 2: FDM process requirements, relevant material/filament properties and characterization methods.

| FDM PHASE | REQUIREMENT | PROPERTY | CHARACTERIZATION METHODS |
|---|---|--|---|
| Filament supply | The filament must be spooled in order to be supplied to the printing facility | Mechanical: <ul style="list-style-type: none"> - Limited stiffness (limited Young Modulus) - High strength (high stress and strain at yielding/fracture) | <ul style="list-style-type: none"> - Tensile tests - Bending tests |
| Feeding and nozzle extrusion | The filament must be pushed into the heating chamber | | |
| | - Without breaking within the feeding gears | Mechanical: <ul style="list-style-type: none"> - High strength (high stress and strain at fracture) | <ul style="list-style-type: none"> - Tensile tests - Bending tests - <i>Ad hoc</i> tests (e.g. Repka-Zhang test) |
| | - Without slippage within the feeding gears | Mechanical: <ul style="list-style-type: none"> - Adequate resistance to yielding to compression (high yield stress) / hardness | <ul style="list-style-type: none"> - Compression tests - Bending tests - Hardness tests |
| | - Without breaking after the feeding gears and in the nozzle | Mechanical / rheological: <ul style="list-style-type: none"> - Adequate buckling resistance (e.g. Venkataraman criterion) | <ul style="list-style-type: none"> - Tensile tests - Rotational/capillary rheometry |
| | - Without excessive deformation between the feeding gears and the nozzle | Mechanical: <ul style="list-style-type: none"> - Limited dependence of young modulus on temperature | - Dynamic mechanical analysis |
| | | Thermal: <ul style="list-style-type: none"> - Limited thermal conductivity/diffusivity | - Thermal analysis (Laser flash method) |
| | The material must flow | | |
| | - Through the nozzle | Rheological: <ul style="list-style-type: none"> - Adequate viscosity | <ul style="list-style-type: none"> - Melt flow index - Rotational/capillary rheometry |
| | - At a controlled rate | Dimensional: <ul style="list-style-type: none"> - Circular filament cross section - Constant filament diameter | - X and y axes laser measurements, e.g. Ovalization |
| | - Without degradation | Thermal/chemical: <ul style="list-style-type: none"> - Degradation temperature higher than process temperature | - Thermogravimetry |
| - Without instability | Rheological | - Capillary rheometry | |
| Layer by layer deposition / solidification | Deposited layers | | |
| | - Must have the desired size | Rheological: <ul style="list-style-type: none"> - Adequate extensional viscosity | - Extensional rheometry |
| | - Must weld to each other | Physical/rheological: <ul style="list-style-type: none"> - Adequate macromolecule interdiffusion | - Rotational rheometry (as indirect method) |
| | - Must keep their shape | Mechanical: <ul style="list-style-type: none"> - Limited dependence of young modulus on temperature | - Dynamic mechanical analysis |
| Thermal: <ul style="list-style-type: none"> - Adequate thermal conductivity/ diffusivity | | - Thermal analysis (Laser flash method) | |

520 Thermal characterization was generally carried out through standard techniques, such as
521 thermogravimetry to inspect material degradation behavior, differential scanning calorimetry to
522 determine the thermal behavior and transition temperatures of the material, and to investigate any
523 modification in the glassy/crystalline phase of the API, if present (Alhijaj et al., 2016; Korte and
524 Quodbach, 2018; Öblom et al., 2019; Sadia et al., 2016). Moreover, the solid-state characterization
525 of active ingredients also was investigated by spectroscopic techniques (*e.g.*, x-rays and infrared
526 spectroscopy). Rheological characterization was performed by standard methods, such as melt-flow
527 index determination, to get a first indication of material printability; and rotational or capillary
528 rheometry when more accurate data were needed, also in view of the modeling of the FDM process
529 (Aho et al., 2015, 2017; Baldi et al., 2014, 2017; Casati et al., 2018; Matijašić et al., 2019; Sadia et
530 al., 2016). A strict control over the filament diameter and shape is needed, as dimensional
531 fluctuations cause changes in the flow of material through the nozzle and subsequent potential
532 nonconformities in printed part dimensions and drug content. As for the evaluation of mechanical
533 performance, no well-established protocol is available yet. According to recent literature, filaments
534 were characterized in terms of mechanical and surface properties, for example stiffness, brittleness,
535 roughness, using commercially available polylactic acid filament as a reference. In parallel, the
536 suitability of custom-made filaments for loading into commercial 3D printers was only qualitatively
537 evaluated by identifying possible issues that could arise during the process: breakup, wrapping
538 around the loading gears and loading process robustness. Manual adjustment of the equipment
539 configuration (*e.g.*, the compression force applied by the gears) together with changes in the
540 filament formulation (*e.g.*, variation in the amount of plasticizer, addition of reinforcement and
541 blending of different polymers) were shown as alternatives to achieve effective loading (Alhijaj et
542 al., 2016; Melocchi et al., 2016; Solanki et al., 2018). More specifically, the main methods
543 described for characterizing the mechanical properties of filaments span from standard tensile or
544 flexural testing to dedicated procedures, such as the Repka-Zhang tests, the combination of dynamic
545 mechanical analysis and tensile tests, as well as various hardness measurements (Aho et al., 2019;

546 Fuenmayor et al., 2018; Nasereddin et al., 2018; Palekar et al., 2019; Yang et al., 2018; Zhang et al.,
547 2017a, 2019).

548 The information provided by these tests, however, is not enough to predict printability and cannot
549 be used to completely set up or fully control the printing process. Conversely, investigating the
550 characteristic behavior (stress-strain) of the material should be carried out by standard techniques to
551 determine its intrinsic mechanical properties, such as the elastic modulus. At a minimum, these
552 properties can be taken into account to determine the printability of a material by comparison with
553 the reference standard. In more refined setups, these properties could be exploited to design the
554 printing process, taking advantage of purposely built mathematical models. Finally, regarding the
555 definition of reference values for each of the properties highlighted here, the main challenge is
556 represented by the strong and complex correlations between material properties, printer features
557 (*e.g.*, nozzle dimensions and shape, feeding system) and process parameters (*e.g.*, feeding rate,
558 nozzle temperature, relative speed between nozzle and tray). Only in a few cases was it possible to
559 identify material attributes that are independent from the printing parameters, such as those
560 proposed by Venkataraman and colleagues to predict filament buckling in the printer nozzle
561 (Venkataraman et al., 2006).

562 Besides the difficulties and questions raised by the need for a rigorous characterization of the
563 filament, its use in most FDM equipment poses a fundamental issue related to the presence of a
564 double heating cycle to the material, first in the filament production by HME and then in its
565 deposition by the printer. In fact, even when working with pharmaceutical-grade excipients, the
566 stability of the intermediate and final products should be verified. Moreover, the second heating
567 step raises issues associated with the homogeneity of the molten formulation, especially when a
568 high load of immiscible phase in the melt is involved, impacting the uniform composition of the
569 final drug product. In addition, the configuration of the printer hardware that regulated the feeding
570 rate of the filaments exhibits a limited ability to generate pressure and to force the material through
571 the nozzle, narrowing the number of polymers that can be processed. In this respect, printing relying

572 on piston, auger and Freeformer technology have very recently been tested in order to avoid the
573 need for manufacturing an intermediate product, as was discussed previously.

574

575 **2.4 Controls**

576 For fabrication of personalized medicines by FDM 3D printing, non-destructive, real-time
577 measurements of the critical quality attributes is a promising strategy for reducing the costs
578 associated with testing while ensuring product quality (Trenfield et al., 2018a,b; Radhakrishnan et
579 al., 2020; Preis and Öblom, 2017; Sandler et al., 2014; Edinger et al., 2018a;
580 [https://www.usp.org/sites/default/files/usp/document/our-work/research-innovation/research-
582 innovation-3d-printing-drug-products.PDF](https://www.usp.org/sites/default/files/usp/document/our-work/research-innovation/research-
581 innovation-3d-printing-drug-products.PDF); Markl et al., 2018). In this respect, the quality by design
583 (QbD) approach is an essential reference (Chandekar et al., 2019; Aucamp and Milne, 2019;
584 Grangeia et al., 2020; Mishra et al., 2018; Yu et al., 2014; Warsi et al., 2018). Its goal is to
585 continuously deliver products with consistent performance by creating a control strategy to
586 guarantee that all sources of process variability are identified, well understood and managed. Risk
587 mitigation may be attained by fostering identification of the critical process parameters (CPPs),
588 which potentially can impact the final product quality (*i.e.*, critical quality attributes, CQAs) as well
589 as its safety, and how these parameters interact with each other. However, such in depth-
590 understanding is yet to be fully attained. CPPs might include printing orientation, layer height,
591 nozzle size, raw material feeding rate, printing speed, nozzle and build plate temperatures, fan speed
592 and relevant variability during the process. Moreover, the characteristics of the starting material
593 should be controlled within specific limits, as discussed before.

593 Such an approach aimed at the optimization of FDM is being pursued in other fields, as it was
594 recognized as critical to improving the overall quality of the printed objects, mostly in terms of
595 aspect, mechanical resistance and sealing between layers (Bähr and Westkämper, 2018; Carlier et
596 al., 2019; Gordeev et al., 2018; Martinez-Marquez et al., 2018; Mohamed et al., 2015; Sood et al.,
597 2009). For example, a study evaluated the possibility of using a custom-made sensor (*i.e.*, a rotation

598 encoder driven by the movement of the filament) to detect the advancement of the filament in the
599 extruder of any FDM printer (Soriano Heras et al., 2018). By checking the encoder rotation
600 repeatedly, control software could determine if the filament is going forward at the desired rate. If
601 no progress is detected, the equipment will stop, allowing the operator to intervene in a timely
602 manner without having to discard the part. This approach, by providing feedback control on the
603 amount of input filament, would also allow for the adjustment of extrusion speed if the measured
604 value does not match the desired one.

605 A few preliminary studies also can be found in the scientific literature relevant to the fabrication of
606 dosage forms/DDSs (Alhijaj et al., 2019; Gioumouxouzis et al., 2017; Markl et al., 2018; Palekar et
607 al., 2019; Smith et al., 2018a, b). However, in these first attempts only a limited number of
608 operating conditions were taken into account, while numerous processing variables - most of them
609 with intrinsic dependence on each other - still need further investigation. These variables include
610 release performance, aspect, density, porosity, friability, fragility and presence of contaminants,
611 such as heavy metals, microbiological and byproducts. In addition, future studies should analyze the
612 reproducibility of the printing process, not only for a single print but for all the products belonging
613 to a single batch.

614 In order to guarantee batch-to-batch uniformity and accelerate the final batch release, the integration
615 of analytical techniques generally used in quality control laboratories into the printers would be
616 highly beneficial (Aucamp and Milne, 2019; Edinger et al., 2018a; Goyantes et al., 2018; Khorasani
617 et al., 2016; Lamichhane et al., 2019; Markl et al., 2017; Robles-Martinez et al., 2019; Scoutaris et
618 al., 2018; Smith et al., 2018a; Trenfield et al., 2018c, 2020). This approach, already tested in
619 continuous manufacturing processes, can be enabled by process analytical technologies (PAT) such
620 as optical measurements and spectroscopic tools (*e.g.*, different infrared spectroscopy techniques
621 such as FTIR and NIR, X-ray, Raman) (Trenfield et al., 2018a; Rahman et al., 2018). Indeed, the
622 latter has already been demonstrated to be suitable for real-time monitoring of various critical
623 quality attributes, such as mass uniformity, moisture content, polymorphism, purity, air entrapment,

624 size, drug content, hardness and disintegration time. Temperature and image sensors, ultrasound,
625 hyperspectral imaging and lasers also could be implemented in on-line measurement of melting
626 temperature, individual layer thickness and product geometry. For example, image analysis would
627 enable operators to obtain multiple views of a product during fabrication so it could be compared
628 with a virtual model to rule out any possible deviations. Thermal imaging could provide insight into
629 polymeric material interfaces, providing a tool to predict thermomechanical properties of the final
630 product and give early warning of potential degradation. Terahertz pulsed imaging would yield data
631 on the microstructure of the printed products. Mathematical models also could be built from the
632 collected data in order to predict the quality attributes of the systems under fabrication, such as
633 assay, dissolution and impurities, to enable the release of a batch without conventional analytical
634 testing (Aho et al., 2019).

635 Indeed, the attainment of a personalized drug product might be considered an inverse problem,
636 since its characteristics (*e.g.*, combination of active molecules, release profiles, mechanical
637 properties) are predetermined in view of the needs of specific patients, and the task is to establish
638 which parameters (*e.g.*, infill, number of shells, starting materials, product geometry) would assure
639 quality of the printed products (Novák et al., 2018). The concept of finding the solution to an
640 inverse problem, taking advantage of well-known correlations between operating parameters and
641 outputs is a common strategy in many fields of product development. Obviously, before being able
642 to enforce such mathematical models based on reliable correlations (of a deterministic or statistical
643 nature), they need to be developed, optimized and validated. The availability of a significant
644 amount of data collected during 3D printing prototyping campaigns and small-series production
645 runs could help in building models with machine learning algorithms. The models could then be
646 refined as more data are collected in larger-scale production campaigns. Highlighting the
647 importance of this approach, a few research studies very recently began to focus on this topic, for
648 instance, with the goal of generating a library of critical quality attributes. This library could be
649 attained by following specific modifications of already identified critical 3D printing parameters,

650 including those relevant to the design step (Korte and Quodbach, 2018; Markl et al., 2017, 2018;
651 Smith et al., 2018a,b; Solanki et al., 2018).

652 Notably, development of software able to create and store suitable digital models of specific items,
653 set operating parameters and capture, manage and save resulting data and all other information
654 associated with production records in a dedicated cloud-based system, would be equally important
655 (Gioumouxouzis et al., 2019; Khatri et al., 2018). At the same time, such software has to be
656 protected from undesired external access, as it would contain sensitive metadata. Moreover, it might
657 be proprietary and developed to work with specific printers, thus increasing the security
658 requirements, but also limiting sharing and accessibility. This software would also create a
659 paperless quality control system, which is essential. For example, one could study the feasibility of
660 QR codes to be verified by smart devices equipped with barcode scanners to enable the tracing of
661 different batches, avoiding mix-ups. Recently, this strategy has also been applied to the fabrication
662 of monolithic systems on top of which traceability codes were printed by inkjet printing (Edinger et
663 al., 2018b; Trenfield et al., 2019b).

664 Software should be checked at pre-established time intervals, to prevent any possible cyber risk
665 (Gioumouxouzis et al., 2019; Khairuzzaman, 2018; Souto et al., 2019). Moreover, issues involving
666 liability, intellectual property and data protection (*e.g.*, digital model, profiles containing the
667 operating parameters, patient data) would need to be addressed to protect manufacturers, operators
668 and end-users.

669 Appropriate procedures need to be developed, especially regarding batch acceptance/rejection.
670 These would benefit from mathematical models built starting from PAT data. Employees should be
671 trained not only on the hardware (*e.g.*, on how to operate, clean and maintain the printer and solve
672 possible issues or deviations), but also on the software.

673

674 **2.5 Environment**

675 The environment where the FDM process is performed also is a key factor impacting the quality of
676 the finished product, especially if unit operations other than 3D printing are carried out
677 simultaneously, as this increases the risk of cross-contamination and hazards for all manufacturing
678 operators involved (Araújo et al., 2019). Such facilities would benefit from a controlled modular
679 structure, as this would reduce the abovementioned risks and simplify the replication of the
680 manufacturing lines in different locations. In this respect, the number of modules to be installed
681 might depend on the expected production volume. As previously discussed, these facilities might be
682 viewed as small-scale manufacturing plants, as they would be conceived with an industrial mindset;
683 for instance, they would be highly automated. Indeed, manual operation would not be suitable for
684 the safe manufacturing of numerous batches of personalized drug products in view of possible
685 issues related to traceability and mix-up. This awareness would open new and interesting
686 opportunities in the application of robotics in pharmaceutical manufacturing, which has just begun
687 to be explored (Fiorini and Botturi, 2008; Kapoor et al., 2020; Rutherford and Stinger, 2001). The
688 new facilities also would be characterized by consistent design, well-established infrastructures,
689 frequently updated procedures, well-maintained hardware/software and suitable and verified control
690 tools, as well as trained personnel. Overall, these would be difficult and expensive to include in a
691 traditional compounding pharmacy, also due to the considerable amount of electricity required to
692 maintain the infrastructure.

693

694 **3. Risks to the operator**

695 Although researchers currently are making significant efforts to quickly and thoroughly investigate
696 the potential of FDM in fabricating drug products, safety-related studies so far have not been
697 pursued with comparable intensity (Gioumouxouzis et al., 2019; Jamróz et al., 2018a). These issues
698 are crucial in understanding the challenges entailed by a new manufacturing process, for which

699 managing risks and guaranteeing adequate safety conditions for operators' health and for the
700 environment is essential.

701 Fabricating medicines often entails extended exposure to chemicals and hazardous conditions
702 (Bhusnure et al., 2018; Binks, 2003; Gathuru et al., 2015;
703 [https://www.who.int/medicines/areas/quality_safety/quality_assurance/ApplicationHACCPMethod](https://www.who.int/medicines/areas/quality_safety/quality_assurance/ApplicationHACCPMethodologyPharmaceuticalsTRS908Annex7.pdf?ua=1)
704 [ologyPharmaceuticalsTRS908Annex7.pdf?ua=1](https://www.who.int/medicines/areas/quality_safety/quality_assurance/ApplicationHACCPMethodologyPharmaceuticalsTRS908Annex7.pdf?ua=1)). These conditions must be strictly controlled and
705 highly regulated to guarantee that personnel will always work under specific levels of tolerated risk
706 for each potentially hazardous variable (*i.e.*, threshold limits). In traditional manufacturing that uses
707 well-established machinery and processes, possible sources of risk are already well-known and
708 easily predictable so that relevant countermeasures can be adopted. Novel technologies, on the other
709 hand, require the development of specifically tailored risk-related studies. In this respect, safety
710 evaluation of the mechanical hazards associated with FDM production cycles, such as hot parts and
711 motors, and the risks associated with exposure to fumes, are needed. While the former would be
712 relatively easy to handle, the latter is still at an initial phase outside of the pharmaceutical area
713 (Byrley et al., 2018; Floyd et al., 2017; Gümperlein et al., 2018; Jeon et al., 2020; Yi et al., 2016;
714 Zhang et al., 2017b).

715 Indeed, this topic has begun to be addressed in view of the increasing popularity of FDM machines
716 for at-home and office use. Researchers recently have evaluated the contaminants developed during
717 3D printing processes, due to the high temperatures involved, and the effects of printer and filament
718 properties on levels of contaminants (*e.g.*, approximately 300,000 particles/cm³ and
719 65,000 particles/cm³ for acrylonitrile butadiene styrene and polylactic acid filaments, respectively).

720 Overall, FDM equipment has been shown to release volatile organic chemicals (VOCs) and
721 ultrafine airborne particles (*i.e.*, < 100 nm in diameter), indicating the potential for inhalation and
722 consequent health risks, especially with long-term exposure. These contaminants are emitted during
723 the thermal processing of many thermoplastic materials and also can be generated when FDM is
724 used to fabricate drug products starting from filaments based on pharmaceutical-grade polymers.

725 While ultrafine particles may have serious health effects, such as increased oxidative stress,
726 inflammation, cardiovascular effects and cytotoxicity, VOCs may contribute to the development of
727 asthma, allergies, obstructive pulmonary disease and lung cancer (House et al., 2017). Particularly,
728 people using 3D printers reportedly may be at risk for respiratory problems, including work-related
729 asthma. Studies on animal models also have shown that such small particles may migrate to the
730 brain through the olfactory system.

731 Systematic studies have evaluated risks associated with FDM, relying on a wide range of
732 experimental methods, mainly those using commercially available filaments and equipment
733 (Stefaniak et al., 2017; Steinle, 2016; Wojtyła et al., 2017, 2020). Although nozzle temperature has
734 largely been recognized as one of the most important variables for generating contaminants, other
735 factors may play major roles. These include:

- 736 *i)* the type and state of the printer, *e.g.*, presence of an external enclosure, number of nozzles,
737 state of maintenance;
- 738 *ii)* the operating parameters, *e.g.*, print speed, printer nozzle size, layer height, build plate
739 temperature;
- 740 *iii)* the characteristics of the employed filament, *e.g.*, presence of adjuvants or undesired
741 contaminants that could occur in degradation;
- 742 *iv)* the characteristics of the item to be printed, *e.g.*, weight and complexity, which impact
743 fabrication time;
- 744 *v)* environmental factors, *e.g.*, room size, ventilation, presence of filters.

745 In order to develop a safer-by-design approach, FDM standard emissions testing protocols should
746 be developed, for instance, drawing inspiration from those already available for laser
747 printers.

748 Scientific works have also advised transforming precautions into operator safety procedures.
749 Recommendations include *i)* using a full enclosure, *ii)* operating the printer in a well-ventilated
750 room and directly ventilating the printer, *iii)* maintaining a certain distance from the equipment to

751 minimize inhalation of emitted particles, *iv*) turning off the printer, in the case of nozzle clogging,
752 and allowing it to ventilate before removing the cover, and *v*) relying on the industrial hygiene
753 hierarchy of controls to mitigate exposures (*i.e.*, from most to least preferable: engineering controls,
754 administrative controls, protective equipment).

755 When considering structures dedicated to FDM, especially for drug products, installing special
756 filters should be considered (Byrley et al., 2019; Floyd et al., 2017). While HEPA filters seem to be
757 ineffective, filters relying on photocatalysis could represent a possible solution. These do not lead to
758 the adsorption of pollutants, but instead degrade them via the activation of oxidative reactions.
759 Moreover, photocatalysis can remove pollutants in very low concentrations, enabling odorless and
760 safe printing.

761

762 **4. Regulatory engagement**

763 3D printing is considered as an emerging technology due to its potential to improve product safety,
764 identity, strength, quality, or purity in certain applications (Khairuzzaman, 2018; Souto et al., 2019;
765 Lee and Zidan, 2018; Zidan, 2019; Zidan et al., 2019a, b). Through the Emerging Technology
766 Program (ETP) developed by Office of Pharmaceutical Quality, Center for Drug Evaluation and
767 Research (CDER), sponsors can engage with the Agency to discuss, identify, and resolve potential
768 technical and regulatory issues regarding the development and implementation of a novel
769 technology prior to filing a regulatory submission
770 ([https://cdn.ymaws.com/www.casss.org/resource/resmgr/dcdg_events/1218_DCDG_BrorsonKurt.p](https://cdn.ymaws.com/www.casss.org/resource/resmgr/dcdg_events/1218_DCDG_BrorsonKurt.pdf)
771 [df; https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/emerging-technology-](https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/emerging-technology-program)
772 [program; https://www.fda.gov/files/drugs/published/Advancement-of-Emerging-Technology-](https://www.fda.gov/files/drugs/published/Advancement-of-Emerging-Technology-Applications-for-Pharmaceutical-Innovation-and-Modernization-Guidance-for-Industry.pdf)
773 [Applications-for-Pharmaceutical-Innovation-and-Modernization-Guidance-for-Industry.pdf;](https://www.fda.gov/files/drugs/published/Advancement-of-Emerging-Technology-Applications-for-Pharmaceutical-Innovation-and-Modernization-Guidance-for-Industry.pdf)
774 <https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/advanced-manufacturing>).
775 To support the ETP, FDA engages in proactive research on the impact of emerging technologies on

776 product quality. Knowledge gained from the internal and sponsored research inform the feedback
777 provided the ETP, ensuring that FDA regulatory policies reflect state-of-the-art manufacturing
778 science. FDA representatives also actively participate in ongoing public-private partnerships to
779 collaborate with a broad range of interdisciplinary stakeholders. FDA is a member of America
780 Makes and participates in research, standards, and road-mapping activities to foster high quality
781 innovation in 3D printed medical products ([https://www.fda.gov/emergency-preparedness-and-](https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/advanced-manufacturing)
782 [response/mcm-issues/advanced-manufacturing](https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/advanced-manufacturing)).

783 The controls, characterization, and testing necessary to ensure product quality for 3D printed drug
784 products may depend on a variety of factors, such as properties of the active ingredient and other
785 formulation components, geometry of the product, 3D printing technology and parameters, drug
786 loading and type of product, *e.g.*, single, multiple, personalized or drug-device combination. Given
787 the variety of 3D printing technologies, materials, geometries and designs, there is no one size fits
788 all control strategy that may be applicable in all cases. In this respect, manufacturers are responsible
789 for determining and justifying with supporting information an appropriate control strategy for their
790 products. It is then anticipated that 3D printed drug products will generally follow the same
791 regulatory requirements in terms of safety, efficacy and quality, and submission expectations as any
792 drug product manufactured using other techniques. In some cases of fixed dose combinations and
793 drug-device combination products, 3D printing manufacturing may raise different questions of
794 safety and/or effectiveness specifications. If the type of technical information to be provided in the
795 submission for a 3D printed drug product is unclear, manufacturers may engage with ETP through
796 the pre-submission process to obtain more detailed feedback.

797

798 **5. Conclusions**

799 Moving to FDM 2.0 in 2020 is a challenge the pharmaceutical community can win. In this respect,
800 this manuscript aims to be a state-of-the-art portrait of FDM, providing readers with a wide and

801 critical overview of the knowledge acquired and areas that still need to be addressed. Indeed, such a
802 provocative approach could be useful in laying the foundation for implementing FDM in the
803 manufacturing of efficacious, safe and high-quality drug products that are suitable for human use.
804 Once the FDM 2.0 phase starts, a next step is to consider good distribution practices, in order to
805 define the role of the printing infrastructure—direct distribution or just manufacturing and reference
806 for traditional distribution?

807 Much work clearly needs to be done before personalized 3D printed products become widely
808 available to patients, not just from the viewpoint of manufacturing. Understanding which regulatory
809 paths apply to the different phases of the overall process (*e.g.*, approval of starting materials,
810 printers, software, control tools, environment) might be more difficult (Gioumouxouzis et al., 2019;
811 Khairuzzaman, 2018; Stones and Jewell, 2017).

812 Moreover, a debate still exists as to whether 3D printed medicines should be fabricated only for
813 products with expired patents. For example, extemporaneous formulations following the
814 prescription of a licensed professional are exempted and should not be considered patent violations,
815 according to intellectual property law in several countries. On the other hand, if 3D printed
816 medicines will be industrially produced, the means of undertaking clinical trials or bioequivalence
817 studies to ensure safety are still unclear. However, since these drug products would be fabricated for
818 specific subjects with unique characteristics, and therefore would differ from each other, a quality
819 approach based on the statistical analysis of the data for a predetermined number of volunteers
820 would be particularly challenging and expensive, especially if such studies would be performed on
821 each individual. Gathering patient feedback and monitoring the critical parameters for a specific
822 disease (*e.g.*, blood pressure, insulin level) would therefore represent a potential alternative to
823 evaluating effectiveness of personalized products.

824 In conclusion, to make FDM-printed personalized drug products available to patients,
825 manufacturers and all the people involved must carefully consider all the aspects described in this

826 review. The effective collaboration of different experts from academia, regulatory agencies, and
827 industry may provide a great start for launching a first personalized product as a proof of concept.

828

829

830 **Conflict of interest**

831 No potential conflict of interest was reported by the authors.

832 This research did not receive any specific grant from funding agencies in the public, commercial, or
833 not-for-profit sectors.

834

835 **Acknowledgements**

836 The authors would like to thank Joanne Berger, FDA Library, and Karen Valentine, FDA Center for
837 Devices and Radiological Health, for manuscript editing assistance.

838

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