PDA Training Course Extractables & Leachables 01 Jun 2022

Where N-Nitrosamine assessments for drug products meet E&L qualifications for pharmaceutical primary packaging

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Introduction

The issue with N-Nitrosamines





The issue with N-Nitrosamines

Since July 2018: recalls for

Valsartan
Other "Sartan"Drugs

Ploglitazone

Ranitinide

Metformin

Rifampicin

Rifapentine

Varenicline

Bumetanide

Sumatriptan

Deferasirox

N-nitrosamine contamination

Extremely carcinogenic

Cohort of concern!!

Monitor concentrations as defined in Regulatory Guidances (ppt levels)!!

N-nitrosamine formation

During **Synthesis** drug Substance (Sartans; NaNO₂ used to

(Sartans; NaNO₂ used to quench Azides)

Degradation of the

API

(Ranitidine)

Packaging

(Nitrocellulose laminated blister)





The issue with N-Nitrosamines

MORE BACKGROUND & CONSEQUENCES FOR:

- The Mutagenic Impurity Risk assessment
- The need for N-Nitrosamine monitoring in drug substances and drug products
- The analytical methods: method development & validation considerations

This presentation: N-nitrosamines in relation to E&L assessments





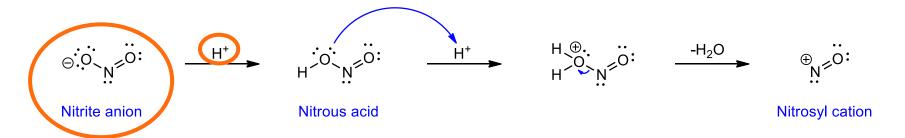
Formation of N-Nitrosamines





The formation of N-Nitrosamines

The actual nitrosation reagent is the nitrosyl cation, NO⁺ which is formed *in situ*:



Secondary alkyl or aryl amines yield *N*-nitrosamines:



Potential sources of amines

- Secondary Amines
- Tertiary Amines

can easily degrade to secondary amines, e.g.:

- Triethylamine
- Diisopropylethylamine
- N-methylmorpholine
- Aromatic Amines
- Catalysts
- Solvents
- Impurities

- Dimethylformamide (DMF)
- N-methylpyrrolidinone (NMP)
- Quaternary Ammonium Salts
 - Tetrabutylammoniumbromide (TBAB)
- Impurities from monoethylamine





Potential sources of nitrosating agents

NaNO₂

 HNO_2

NO

CINO

BrNO

 $N_{2}O_{3}$

 $N_{2}O_{4}$

Organic Nitrites

Side reactions in nitration reactions

Hydroxylamine under oxidative conditions

Chloramines

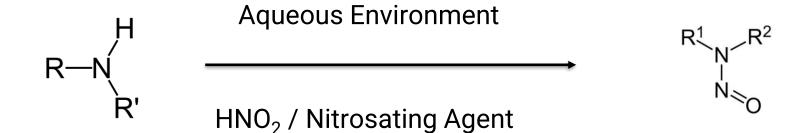
Ozone

Other...





Risk of formation



Low [HNO₂ /nitrosating compound]
Low [Secondary Amines]

High [HNO₂ /nitrosating compound]

Low [Secondary Amines]

High [HNO₂ /nitrosating compound]
High [Secondary Amines]

Increasing risk of N-Nitrosamine Formation





Historical Cases

Pharma primary packaging as source of N-Nitrosamines



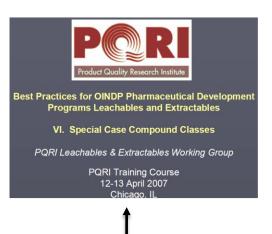


Rubber gaskets for MDIs

Curing / Cross Linking

CS₂ detection in Headspace GC/MS can be an indicator for Secondary Amines and subsequent N-Nitrosamine formation

Tetramethylthiuram disulfide



$$H_3C$$
 $N-H$
 $+$
 NOX
 H_3C
 H_3C
 $+$
 H_3C

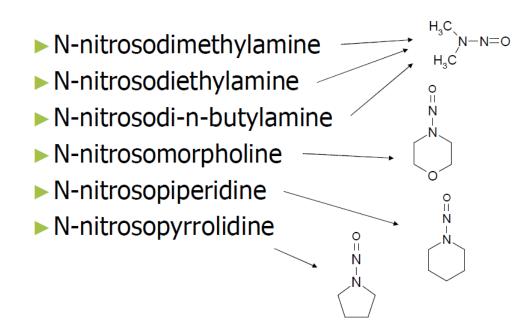
Based on work done by Dan Norwood & James O. Mullis



Rubber gaskets for MDIs



Target N-nitrosamines





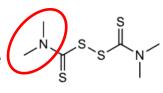


Overview of old & new vulcanizers (1)

6-(dibutylamino)-1,3,5-triazine-2,4-dithiol

SH N N N SH

Tetramethylthiuram disulfide



Zinc bis(dibutyldithiocarbamate)

$$C_4H_9$$

$$S$$

$$S$$

$$S$$

$$S$$

$$S$$

$$C_4H_9$$

$$S$$

$$S$$

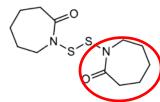
$$S$$

$$C_4H_9$$

$$C_4H_9$$

Tetramethylthiuram monosulfide

N,N'-Caprolactam disulfide



N-cyclohexyl-2-benzothiazole sulfenamide

N,N,N',N'-Tetrabenzylthiuram disulfide



Overview of old & new vulcanizers (2)

Hexamethylene tetramine (HMT)

$$N \longrightarrow N$$

Ethylidene aniline (EA)

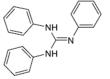
Diphenyl guanidine (DPG)

N-Oxydiethylbenzthiazylsulfenamide (NOBS)

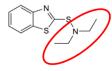
N-t-butylbenzthiazylsulfenamide (NS)

Ethyl phenyl thiocarbamate

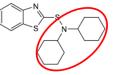
Triphenyl guanidine (TPG)



Diethyl (di)thiocarbamate



N,N'-Dicyclohexylbenzthiazylsulfenamide (DZ)



Dipentamethylene thiuram tetrasulfide (DPTS)



Overview of old & new vulcanizers (3)

Rubber accelerators: A lot of Tertiary Amines which easily degrade to secondary amines during the rubber curing!!





Blister foil (1)

Nitrocellulose multilayer blister foil

Nitrosamine contamination has been observed in a finished product stored in blister.

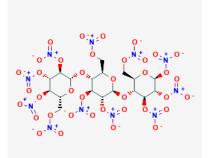
It was hypothesized that the lidding foil containing **nitrocellulose printing primer** may react with **amines in printing ink** to generate nitrosamines, which would be transferred to the product under certain packaging process conditions.





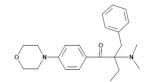
Blister foil (2)

Nitrosating compound: Nitrocellulose



Many pigments (azo) used in printing inks contain nitrogen in their chemical structure. some may contain secondary and tertiary amine functional groups on the skeletal exterior.

UV-Curing Agents Irgacure 369



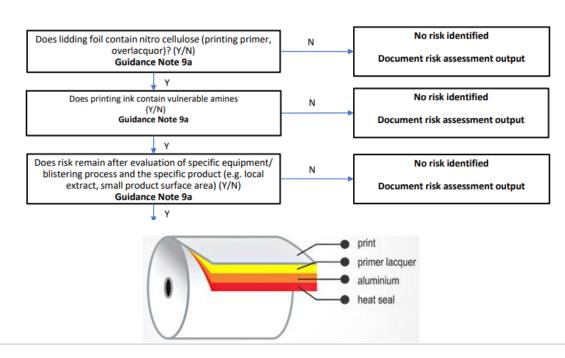
Irgacure 379

Irgacure 907

3. Risk Assessment for Nitrocellulose Packaging Materials









Nitrile rubber gloves

PAPER • OPEN ACCESS

Migration of N-nitrosamines from rubber gloves for handling food - Effect of extraction media

To cite this article: O Pinprayoon and W Mae 2019 IOP Conf. Ser.: Mater. Sci. Eng. 548 012022

Origin: accelerators for cross linking (thiurams)

$$\nearrow^N$$
 \searrow^S
 \searrow^N



Open questions

- What about other materials?
- Not all have the same risk for presence of secondary amines
 - Risk assessment: check the known composition of the material to see if any compounds are present that could lead to generating secondary amines
- How can the risk of presence of N-Nitrosamines in packaging components be assessed?
- Do all components and materials need to be assessed?
- Can we be selective in what should be evaluated?





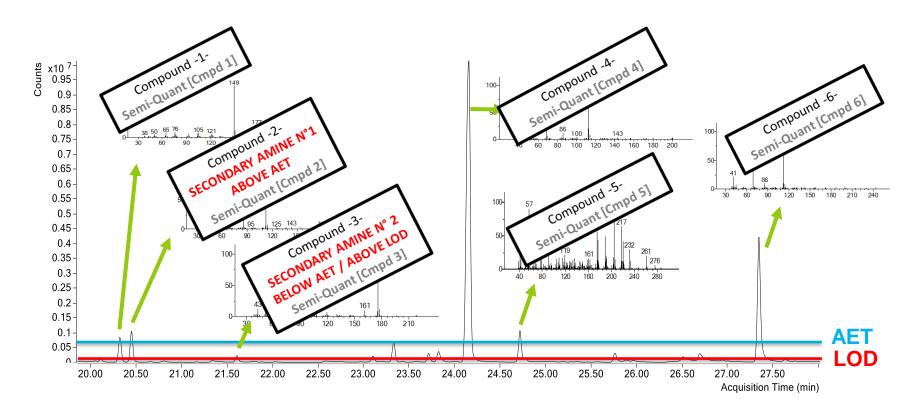
E&L screening

Can it contribute to N-Nitrosamine detection?





Chromatographic screening process

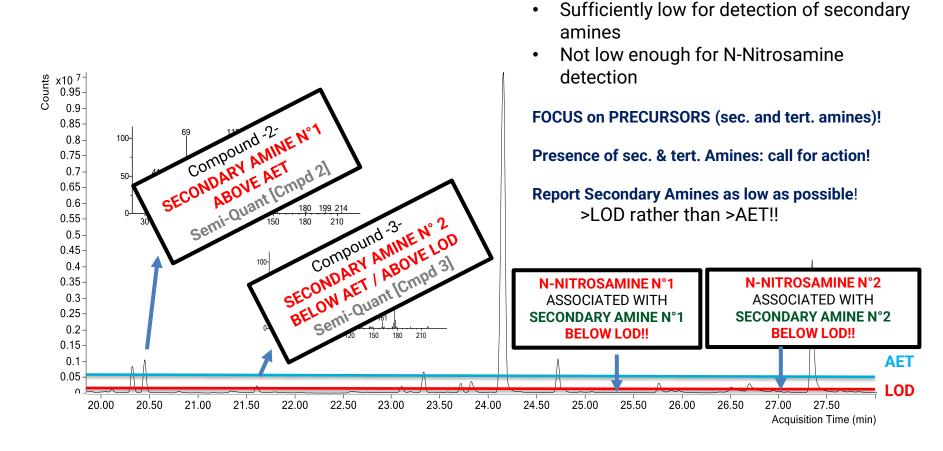




LOD for GC/MS: 30 µg/L for Standard Screening



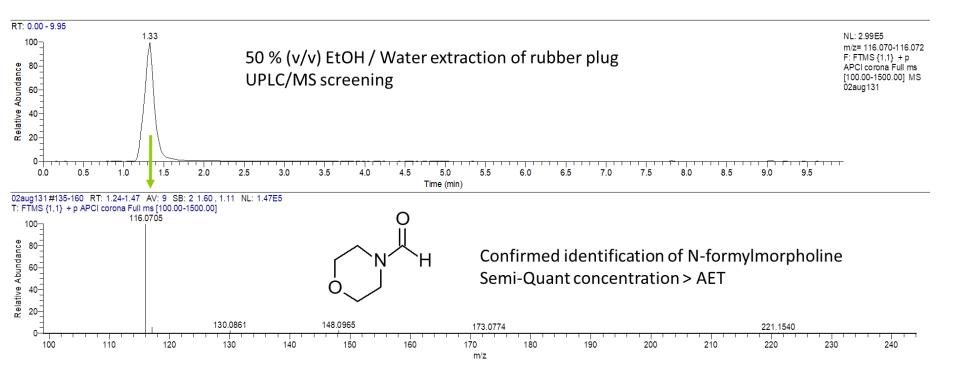
Chromatographic screening process







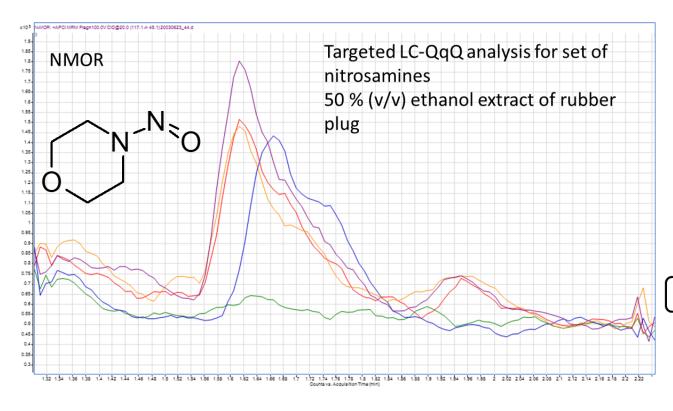
Case study 1: rubber plug (2020)







Case study 1: rubber plug (2020)



Blank extract

Sample 1

Sample 2

Sample 3

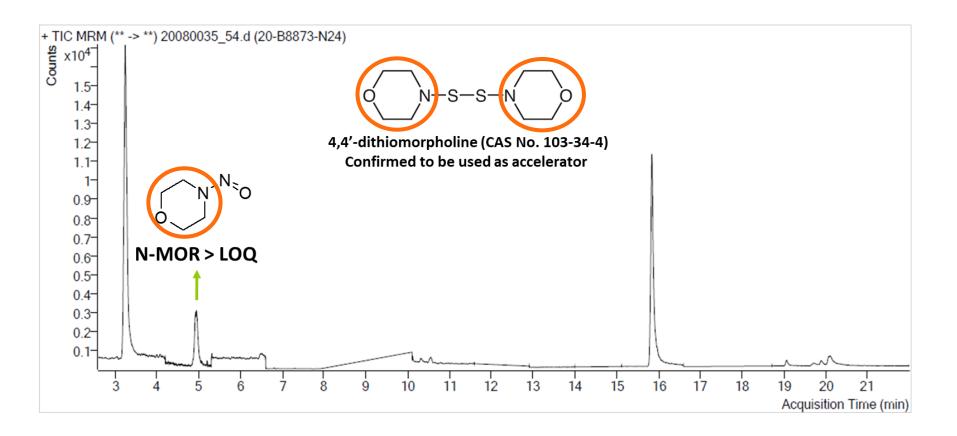
Sample 4

N-nitrosomorpholine > LOQ





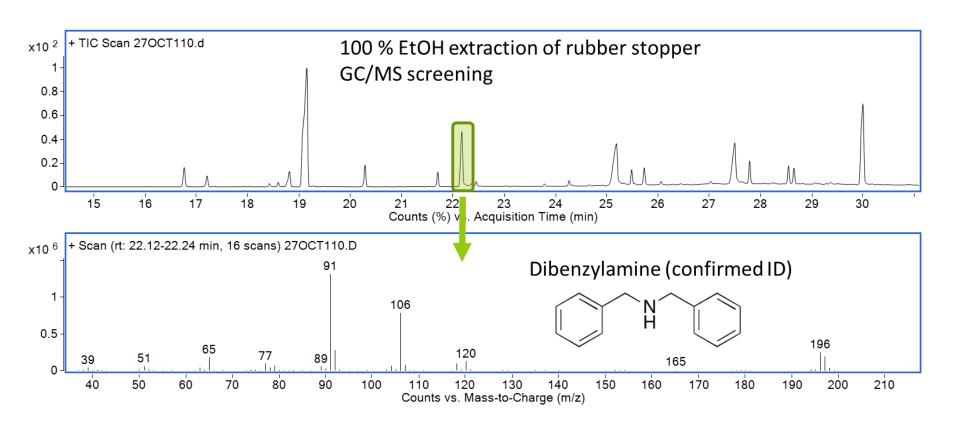
Case study 2: rubber stopper (2020)







Case study 3: rubber stopper (2021)

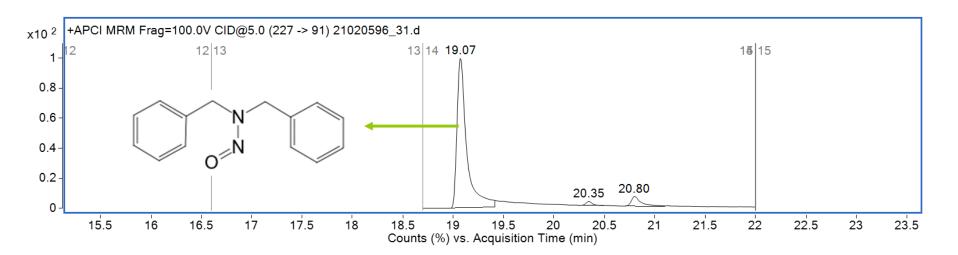






Case study 3: rubber stopper (2021)

Targeted LC-QqQ analysis for set of nitrosamines - 50 % (v/v) ethanol extract of same rubber stopper







Impact on E&L studies?

Potential consequences on E&L study design





Extractables study

Presence of amines in materials / components: TRIGGER for ACTION

Be sure you can **identify all relevant secondary and tertiary amines** in materials research (DATABASE!)

Report Secondary & Tertiary Amines above the LOD, rather than above the AET!

When secondary Amines are present: Further **investigate the material for N-Nitrosamine presence** with targeted, sensitive analytical method

Two options:

- Specific N-nitrosamine quantification related to the observed secondary amines
- Broader detection of a list of N-Nitrosamine compounds





Leachables study (1)

Scenario 1: no amines detected > LOD in extractables study

no immediate concern of N-nitrosamine presence from a packaging perspective

no direct consequence for the leachable study

(which does not mean N-nitrosamines can't be present in the drug product)





Leachables study (2)

Scenario 2: N-Nitrosamines are directly detected in a material extract

- Consider change of material of construction?
- No material change: monitor the N-Nitrosamine in the drug product leachables study

Scenario 3: Amines detected > LOD but no N-Nitrosamines

- Can N-nitrosamines be formed in the Drug Product (during stability) from "secondary Amine" Leachables from the materials?
 - Little is known about the "in-situ" formation of N-Nitrosamines in the drug product
 - Perform a Nitrosamine risk assessment if not yet done:
 - Are there any nitrosating agents present in the drug product?
 - Is the reaction environment favorable to form N-Nitrosamines?
- Consider:
 - To include the amine as a target compound for follow-up in leachables study
 - To monitor the associated N-Nitrosamine in leachables study





Parallel with ICH Q3D implementation?

Elemental Impurities in **EXTRACTABLES**:

Focus on known composition of materials + Broader Screening June 2016
Implementation of
ICH Q3D

Elemental Impurities in **EXTRACTABLES:**ALL ICH Q3D ELEMENTAL IMPURITIES

Elemental Impurities in **LEACHABLES**:

Focus: ELEMENTAL IMPURITIES detected in EXT studies

RELEVANT Elemental Impurities

Elemental Impurities in

LEACHABLES:

ALL ICH Q3D ELEMENTAL

IMPURITIES

ALLElemental Impurities





Parallel with ICH Q3D implementation?

Potential presence of N-Nitrosamines in

EXTRACTABLES:

Limited to certain applications and associated materials

2019-2022 Regulations FDA & EMA **N-Nitrosamines** **EXTRACTABLES:**

SCREEN FOR ALL N-NITROSAMINES IN ALL MATERIALS?

Potential presence of N-Nitrosamines in **LEACHABLES**:

Limited to certain applications and associated materials

RELEVANT N-Nitrosamines



LEACHABLES:

TARGET
ALL N-NITROSAMINES IN
ALL DRUG PRODUCTS?

ALL N-Nitrosamines





Conclusion





Conclusion

- There is a general concern about the presence of N-Nitrosamines in Drug Products
- One of the potential sources of N-Nitrosamines is the packaging of the drug product
- Historical Cases showed N-Nitrosamine contamination of the Drug Product from the Packaging
- Do we know everything about the packaging already?
 - Assessment of production and composition of packaging materials
- For Extractable Studies: focus on precursors of N-Nitrosamine formation above LOD
 - Secondary Amines
 - Tertiary Amines
- Potentially monitor secondary/tertiary amines during Leachable studies
- Include associated N-Nitrosamine monitoring at low levels in Leachable studies?
- What will the future bring? General monitoring of N-Nitrosamines in Leachable Studies?
- Time will tell...







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