PDA Training Course Extractables & Leachables 21 April 2023

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



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The issue with N-Nitrosamines



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 quench Azides)

Degradation of the API (Ranitidine)

Packaging (Nitrocellulose laminated blister)



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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





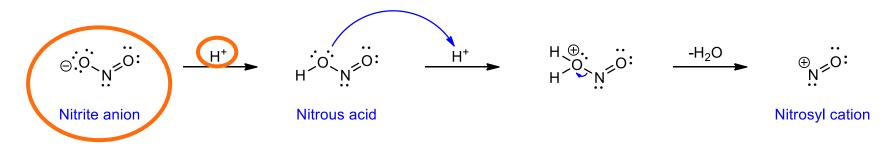
Formation of N-Nitrosamines



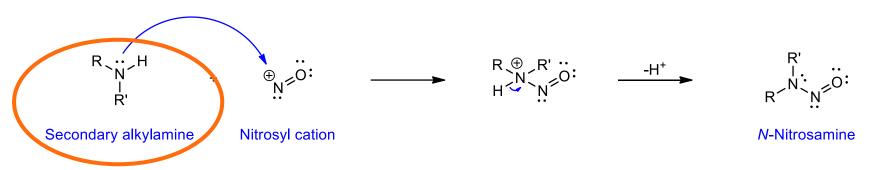
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The actual nitrosation reagent is the nitrosyl cation, NO⁺ which is formed *in situ*:



Secondary alkyl or aryl amines yield N-nitrosamines:







Potential sources of amines

- Secondary Amines
- Tertiary Amines
 - can easily degrade to secondary amines, e.g.:
 - o Triethylamine
 - o 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

NaNO ₂
HNO_2
NO
CINO
BrNO
$N_{2}O_{3}$
N_2O_4

Organic Nitrites Side reactions in nitration reactions Hydroxylamine under oxidative conditions Chloramines Ozone Other...





Risk of formation

Aqueous Environment

HNO₂ / Nitrosating Agent

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



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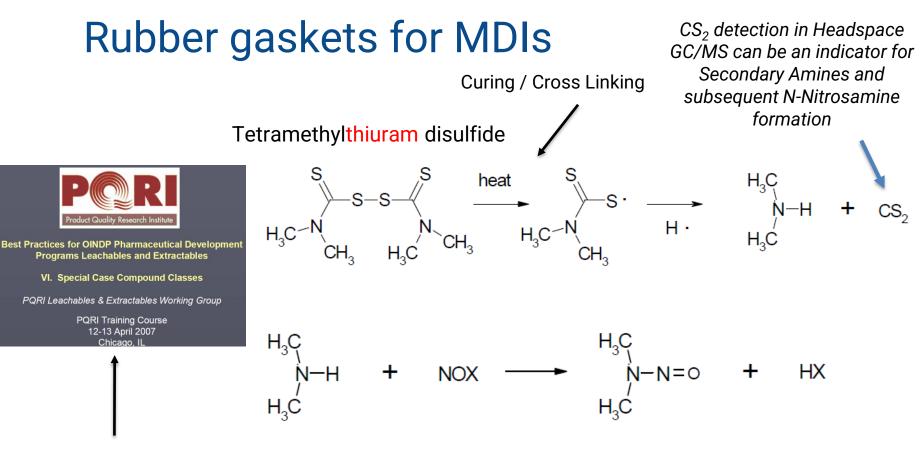
Historical Cases

Pharma primary packaging as source of N-Nitrosamines



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





Rubber gaskets for MDIs



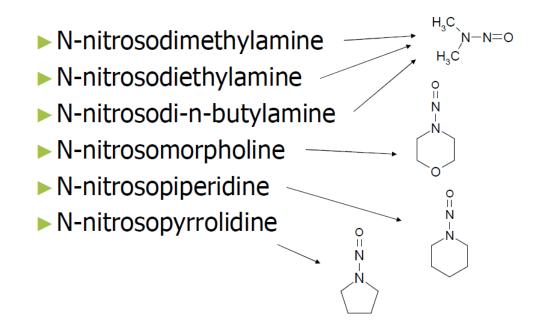
Best Practices for OINDP Pharmaceutical Development Programs Leachables and Extractables

VI. Special Case Compound Classes

PQRI Leachables & Extractables Working Group

PQRI Training Course 12-13 April 2007 Chicago, IL

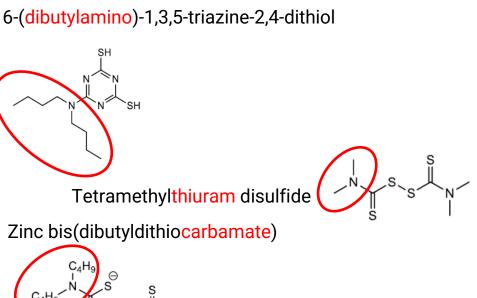
Target N-nitrosamines







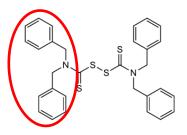
Overview of old & new vulcanizers (1)



N-cyclohexyl-2-benzothiazole sulfenamide

N,N'-Caprolactam disulfide

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

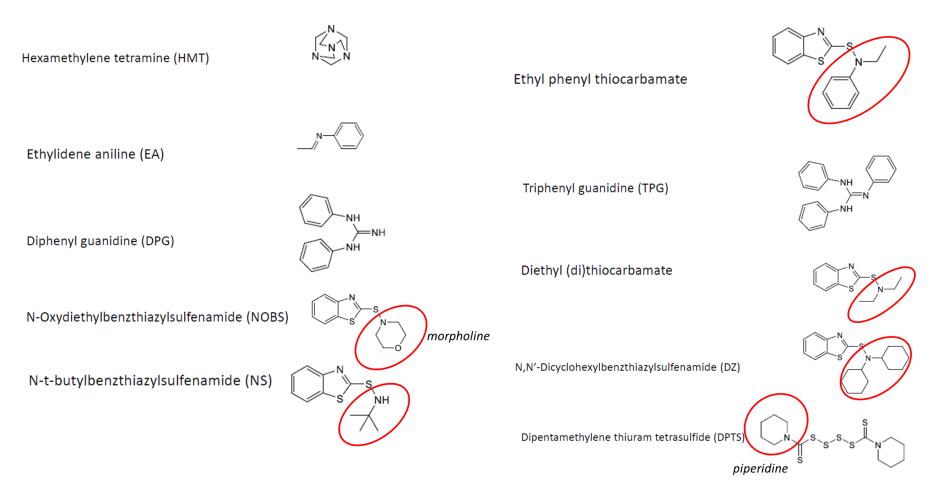


CONNECTING PEOPLE SCIENCE AND REGULATION" Zn²⁺

Tetramethylthiuram monosulfide



Overview of old & new vulcanizers (2)







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

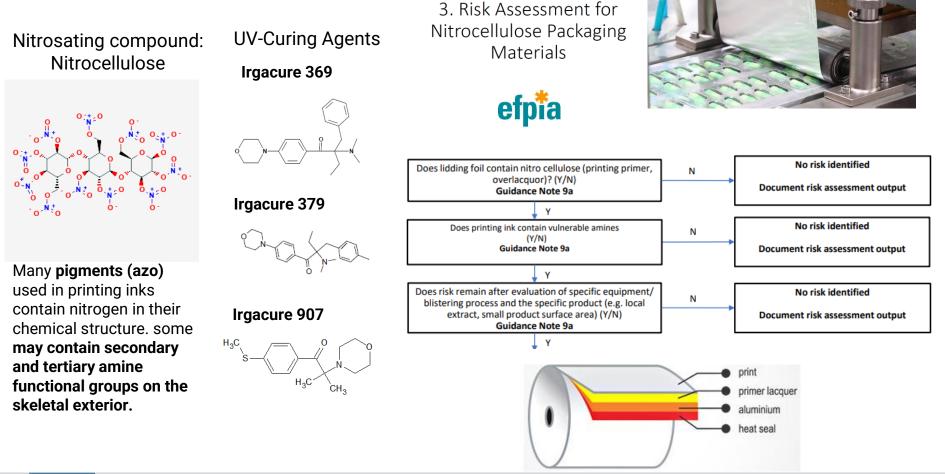
Nitrosamine contamination has been observed in a finished product stored in blister.

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)







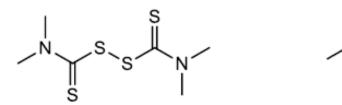
Nitrile rubber gloves

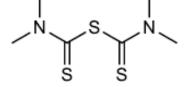
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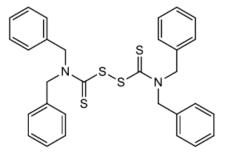
Migration of N-nitrosamines from rubber gloves for handling food - Effect of extraction media

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

Origin: accelerators for cross linking (thiurams)











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

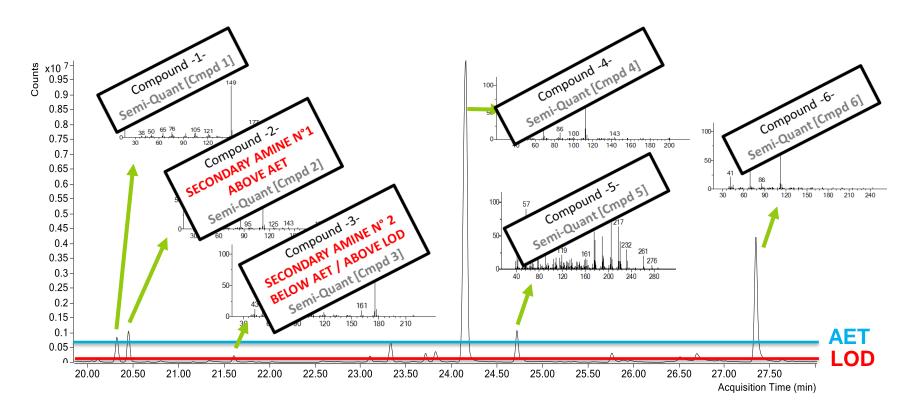
Can it contribute to N-Nitrosamine detection?



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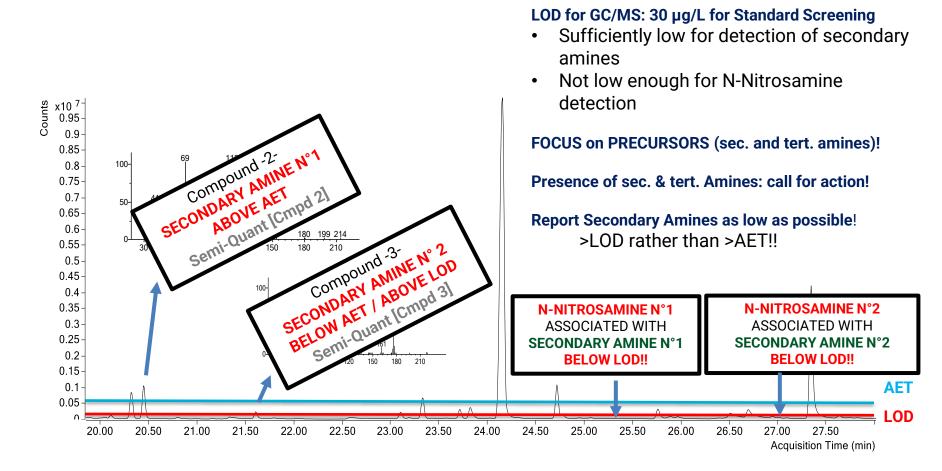
Chromatographic screening process







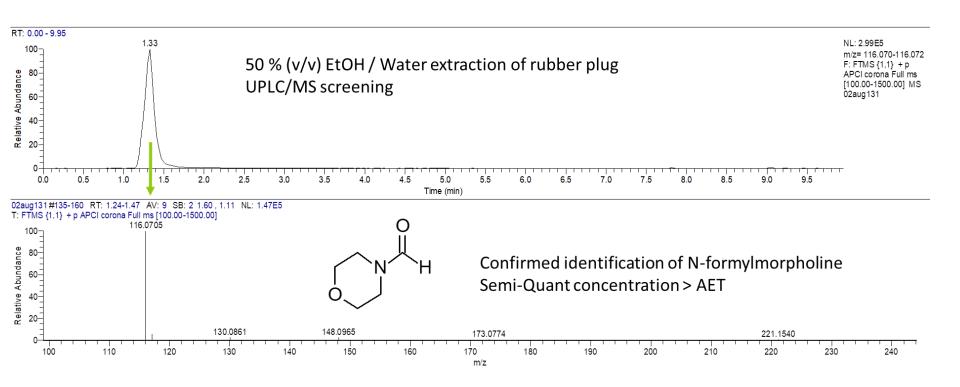
Chromatographic screening process







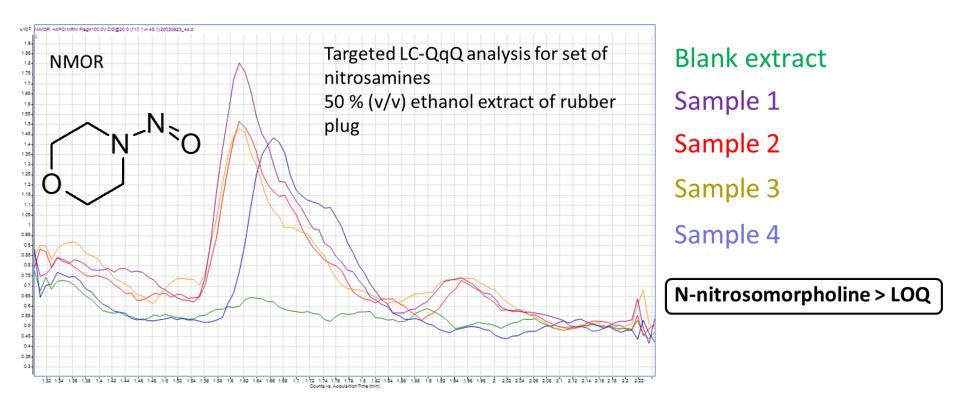
Case study 1: rubber plug (2020)







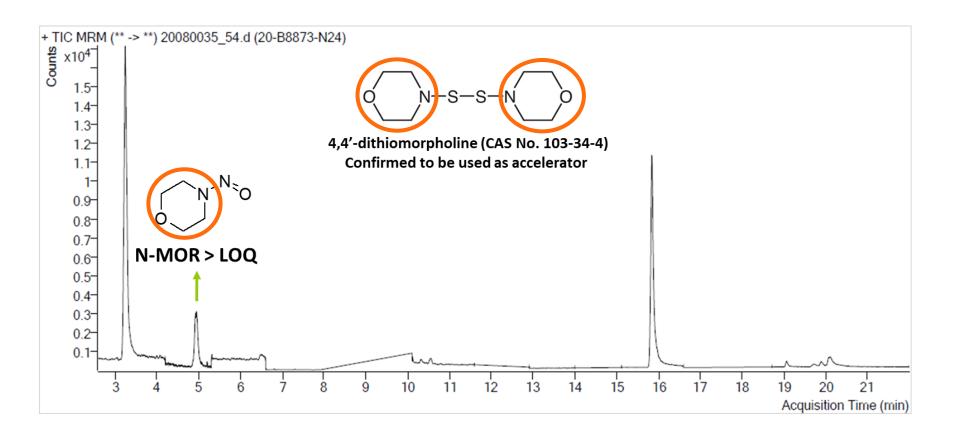
Case study 1: rubber plug (2020)







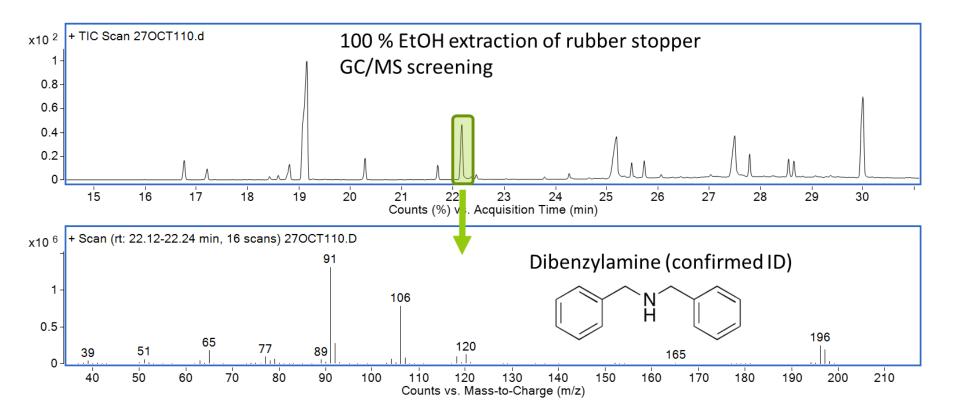
Case study 2: rubber stopper (2020)







Case study 3: rubber stopper (2021)

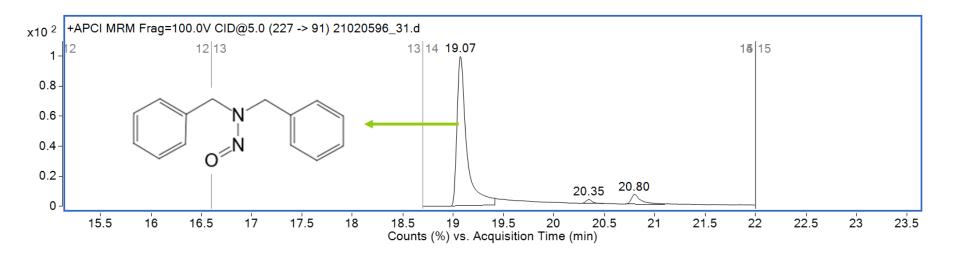






Case study 3: rubber stopper (2021)

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



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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

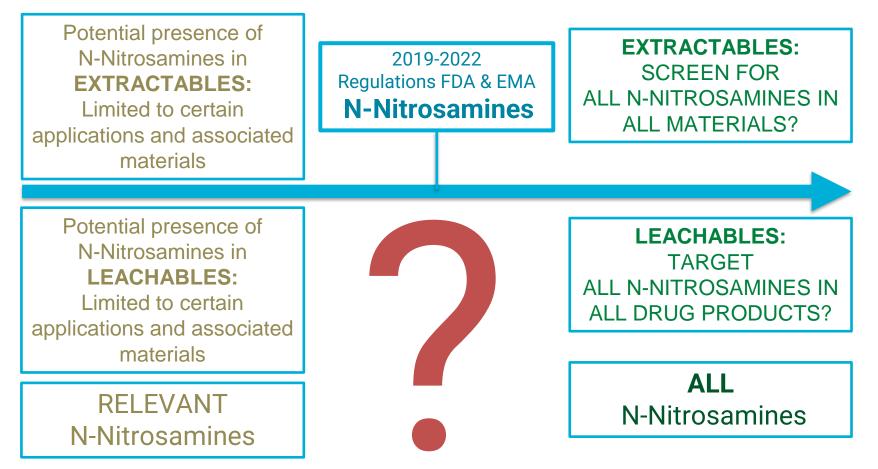
RELEVANT Elemental Impurities Elemental Impurities in LEACHABLES: ALL ICH Q3D ELEMENTAL IMPURITIES

ALL Elemental Impurities





Parallel with ICH Q3D implementation?







Conclusion



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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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