GRx BioSims Nitrosamine Panel
Oct 2024
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Canadian-Based
Global Health Company

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Nitrosamine Guidance – Current State

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Control of Nitrosamine Impurities in Human Drugs

Guidance for Industry

Additional copies are available from:

Office of Communications, Division of Drug Information
Center for Drug Evaluation and Research
Food and Drug Administration
10001 New Hampshire Ave., Hillandale Bldg., 4th Floor
Silver Spring, MD 20993-0002
Phone: 855-543-3784 or 301-796-3400; Fax: 301-431-6353
Email: druginfo@fda.hhs.gov
https://www.fda.gov/drugs/guidance-compliance-regulatory-information/guidances-drugs

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)

September 2024
Pharmaceutical Quality/ Manufacturing Standards (CGMP)

Revision 2

Apotex applauds  FDA for

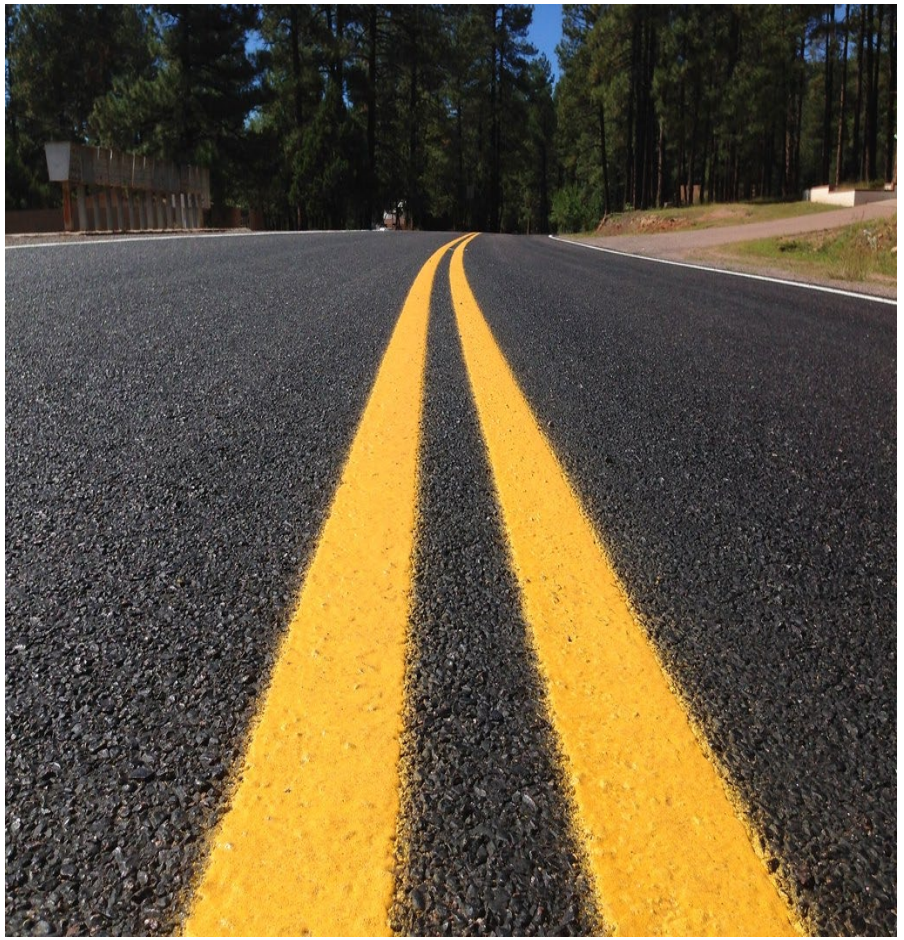
- Publishing a progressive and forward-looking guidance in Sep 2024

- It is first of its kind and serves as a new global benchmark on this topic

We are hopeful that other regulators will adopt a similar approach

Pathway to Progress in last 6 yrs…..

- Started with simple nitrosamines and evolved to NDSRIs ensuring patient safety is prioritized
- Better understanding of root cause to enable remediation
- Harmonized approach by regulators
- Engagement of industry participants including the generic sector
- Embracing emerging scientific knowledge
- Improved transparency and knowledge sharing
- Clarity and predictability through well written guidance documents
- FDA’s progressive guidance has set a new benchmark
- Clear expectations and pathways for communication to prevent supply gaps



Opportunities for further Harmonization

- Align AI Limits across regulators
- Application of LTL approach when AI limits are exceeded
- Allow Skip testing when results are within 30% of AI to reduce burden on industry
- Clarify in guidance that drug substance suppliers may need to apply lower limits
- Global harmonization through ICH M7 Updates - initiated

Opportunities for Improvement – Regulatory filing

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- Reduced filing category for updates to specification when AI limit is based on CPCA
- Application of interim limits listed in guidance without prior approval
- Removal of a test that meets guidance requirements as AR change
- Further extension of biowaiver as more data becomes available

Key Takeaways

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- ✓ Significant progress made in last 6 yrs
- ✓ Excellent collaboration between regulators and industry
- ✓ FDA has paved the pathway for faster remediations through a progressive and forward-looking guidance
- ✓ Ongoing efforts for further harmonization in progress

The Ask:

Unique challenges for generic sector due to large supplier base and large number of products to be tested and remediated….

- Consider the improvement opportunities as listed in previous slides
- Consider extending the Aug 2025 deadline to allow time for remediations and to ensure continued patient access to medications

Thank you!

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