CHPA CONSUMER HEALTHCARE PRODUCTS ASSOCIATION
founded 1881

July 27, 2017

Robert Femia, Ph.D., Senior VP
Edmond Biba, Ph.D., Scientific Liaison
US Pharmacopeia ("USP")
12601 Twinbrook Parkway
Rockville, MD 20852-1790

Re: Correspondence Number C169045

Dear Drs. Femia, and Biba:

On behalf of the Consumer Healthcare Products Association (CHPA), a 136 year-old trade association representing the nation's leading over-the-counter (OTC) medicine and nutritional supplement manufacturers, I would like to comment generally on the revisions of USP General Chapter for residual solvents (<467>) which will add dietary supplements to the scope and would add new testing requirements to dietary ingredients and food additives. As you know CHPA supports improving the compendial test methods and establishing product standards which provide a measure of safety for OTC products.

We are supportive of the International Pharmaceutical Excipient Council of The Americas' (IPEC) recommendations detailed in their correspondence (attached) that USP remove references to dietary supplements and their ingredients.

In addition, we recommend that USP adopt the changes in ICH Q3C (R6), clarify the Introduction, and Control Strategy sections, and add a definition for residual solvents "not likely to be present."

We suggest using following text (taken from the Introduction of the current chapter) since it clearly articulates the goal and addresses coatings and printing inks:

> Testing of drug substances, excipients, and drug products for residual solvents should be performed when production or purification processes are known to result in the presence of such residual solvents. It is only necessary to test for residual solvents that are used or produced in the manufacture or purification of drug substances, excipients, or products.

Information on residual solvents in coating materials, colorants, flavors, capsules and imprinting inks is generally not needed unless Class 1 solvents are used in the manufacture of these components.

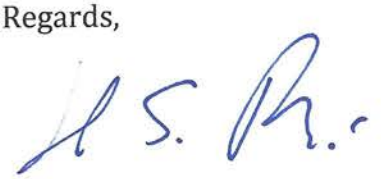
Although manufacturers may choose to test the drug product, a cumulative procedure may be used to calculate the residual solvent levels in the drug product from the levels in the ingredients used to produce the drug product. If the calculation results in a level equal to or below that provided in this general chapter, no testing of the drug product for residual solvents need be considered. If, however, the calculated level is above the recommended level, the drug product should be tested to ascertain whether the formulation process has reduced the relevant solvent level to within the acceptable amount. A drug product should also be tested if a residual solvent is used during its manufacture.

The control strategy section should be clarified by using the terms *drug product and ingredients* instead of official product and official substances. This section states that the user may choose to demonstrate compliance by analysis of the official product or analysis of the official substances. However, the need for testing should be left up to the manufacturer since the decision depends on many factors, including the information received from validated suppliers, the levels of solvents that might be present, and the amount of each material used in the formulation. Based on information provided by suppliers of drug substances and excipients, it is possible to calculate the levels of solvents that may be present in a drug product and determine what testing is required.

CHPA is concerned that the USP has not added a definition of "not likely to be present." USP should gain alignment with industry and regulators on reporting residual solvents, which are consistently controlled at levels not more than 10% of the <467> limit for Class 2 and Class 3 solvents.

CHPA appreciates the opportunity to represent the OTC industry and contribute to USP's modernization efforts. I am happy to speak with you about this issue at greater length and detail. Feel free to contact me directly at your convenience.

Best Regards,



John S. Punzi, Ph.D.
Senior Director Quality Assurance and Technical Affairs

Cc Mario P. Sindaco, M.S., M.B.A., Director, Compendial Affairs and Executive Secretariat, Council of Experts