## RESEARCH PAPER

# Safety Risk Categorization of Organic Extractables Associated with Polymers used in Packaging, Delivery and Manufacturing Systems for Parenteral Drug Products

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Received: 16 July 2014 /Accepted: 12 September 2014 /Published online: 4 October 2014  $\oslash$  Springer Science+Business Media New York 2014

## **ABSTRACT**

Purpose To develop and justify a Risk Evaluation Matrix for estimating the safety risk associated with extractables from plastic materials used in pharmaceutical applications and to apply that matrix to approximately 510 extractables to assess the risk that they would accumulate in drug products at levels sufficiently high to affect patient safety.

Method The Risk Evaluation Matrix considers toxicological, availability and solubility characteristics of extractables. Safety Risk categories were established based on certain scaled values for these characteristics, Total Risk Scores were calculated for each extractable and the extractables were categorized with respect to their safety risk based on these calculations.

**Results** The Total Risk Scores were normally distributed around a value of 20 to 23, corresponding to safety risk categories of moderate and intermediate risk. The range in Risk Scores defined by the mean  $\pm$  one standard deviation encompassed the entire region of moderate and intermediate risk. Approximately 15% of the extractables were categorized as lowest risk while 3% of the extractables were categorized as highest risk.

**Conclusions** Categorization of extractables could facilitate the selection of materials for use in pharmaceutical systems, the analytical testing of extracts and the selection of target extractables.

KEY WORDS devices · extractables · leachables · parenteral packaging . safety assessment

## INTRODUCTION

During their production, storage and use, pharmaceutical drug products encounter polymeric materials present in the product's manufacturing, packaging and delivery systems. During these encounters, the drug product and the materials may interact, resulting in the transfer of extractable materials from the polymer to the drug product. Such substances present in the drug product are called leachables. As users of the drug products are exposed to the leachables during their use of the drug product, leachables could represent a potential patient safety hazard. The magnitude of the patient safety risk posed by a given leachable can be estimated by two factors, the hazard presented by the leachables (reflecting their toxic potential) and the likelihood that users would be exposed to sufficient quantities of the leachables to pose a hazard. This approach is equivalent to the concept that risk is a combination of the probability of the occurrence of harm and the severity of the harm, as noted in ICH Q9 [[1](#page-22-0)].

There are certain characteristics of polymeric materials and leachables that are readily recognized as potential hazard factors:

- the potential toxicity/mutagenicity of the leachable,
- the amount of the compound extract,
- the frequency that the compound is encountered in diverse materials, and
- the solubility of the leachable in the formulation.

If one could establish a semi-quantitative scale versus the largely qualitative generalizations noted above, and if the scale could be applied to the individual members of a population of extractables, then the individual members could be classified or rank-ordered in terms of their hazard potential.

In this manuscript, the safety risk represented by extractables is defined by two dimensions; the hazard (as established by the inherent toxicity of the extractable) and the probability of occurrence (as established by the frequency with which extractables are present in polymeric materials, the amounts at which the extractables are present in the materials and the propensity of the extractables to accumulate in the drug products as leachables). This partitioning is the basis of a Risk Evaluation Matrix, which was applied to over 500

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Fig. I Process flow diagram illustrating the calculation of the total risk score from its various components

extractables for the purpose of stratifying the extractables in terms of their relative safety risk.

## MATERIALS AND METHODS: THE RISK EVALUATION MATRIX

#### General Considerations

The safety qualification of polymeric materials, components and systems is driven largely by the principles of risk management, as opposed to the principles of risk avoidance. This is the case as it is largely impractical, if not impossible, to completely avoid the safety risks associated with leachables, as so doing would require that either (a) all leachables be avoided or (b) all leachables be toxicologically inert (that is, the leachable's physical, chemical and biological properties would be such that the leachable would have no adverse effect on user health and well-being).

The objective of stratifying a large population of extractables based on a semi-quantitative estimation of their associated safety

Table I Definition of the Safety Component of the Risk Evaluation Matrix

risk is accomplished by establishing a Risk Evaluation Matrix and then applying that Matrix to the individual extractables to produce a Total Risk Score for each extractable (see Fig. 1). Broad safety risk categories were developed by applying certain constraints to the safety risk scoring process, thereby dividing the range of potential Total Risk Scores into safety categories. Based on their individual Total Risk Scores and the safety groupings, the individual extractables are classified.

In this exercise, the Risk Evaluation Matrix consisted of two primary inputs, including measures of the extractable's inherent toxic potential and the extractable's availability. The extractable's availability is further partitioned into two secondary inputs, the frequency with which the extractable is reported in the study of polymers used in pharmaceutical applications and the extractable's tendency to migrate out of those materials and into the drug product. These primary and secondary inputs were used to calculate the Total Risk Score for each individual extractable.

The Risk Evaluation Matrix is predicated on the generalization that the safety risk is greater when:

- 1. The extractable's toxic potential is higher,
- 2. The extractable's amount in the source material is higher,
- 3. The extractable is more frequently detected in diverse materials, and
- 4. The extractable is more soluble in aqueous drug products.

#### Safety Hazard

Considering the development and justification of the Risk Evaluation Matrix in greater detail, Table I considers the safety hazard posed by the extractable (when present as a



<sup>a</sup> The Risk Index is an estimate of the toxic potential of a specific extractables, calculated per ref. [[2\]](#page-22-0)

 $<sup>b</sup>$  Established for either the extractable itself or its associated surrogate, per ref. [\[2](#page-22-0)]</sup>

<sup>c</sup> Reflects published in vitro mutagencity alerts as well as calculated in silico alerts per ref. [\[2\]](#page-22-0)

leachable). The safety hazard is estimated by calculating a composite safety score for each extractable based on three criteria, the extractable's Risk Index, structure-activity analysis of the extractable (Cramer classification) and reported in vitro or in silico mutagencity Alerts. The source of the data used in the safety scoring is a compilation of safety data for extractables that has recently been published [[2\]](#page-22-0). This compilation introduced the concept of the Risk Index, which is obtained by systematically applying uncertainty factors to available toxicological data (such as NOELs, LD50s) in a manner similar to, but not as rigorous as, the calculation of permissible daily exposure (PDE) values according to ICH.

An extractable's safety score is calculated as follows:

- 1. The range of risk index values is divided into four groups based on the magnitude of the RI. An extractable with a larger RI (higher amounts required to produce toxicity, therefore lesser safety hazard) is given a lower safety score and an extractable with a smaller RI (lesser amounts required to produce toxicity, therefore higher safety hazard) are given a higher safety score. Each RI group is given a point value (see Table [I](#page-1-0)), based in part on a consideration of the previously reported distribution of the RI values. For example, the criterion for the highest risk index score of 3 was that the RI be less than 0.1 mg/day, which corresponded to the 95% percentile on the extractable's RI cumulative distribution plot.
- 2. The extractable is assigned a risk score based on its Cramer classification. Based on Quantitative Structure-Activity Relationships (QSAR), the Cramer classification is a rules-based process that sorts compounds into three classes; Class 1 (low risk of toxicity), Class 3 (either no basis

to presume safety or positive indication of toxicity), and Class 2 (intermediate between 1 and 2). Somewhat arbitrarily, the Cramer classifications were given scores whose value increased with the increasing Cramer class.

- 3. Lastly, the extractable is assigned a risk score based on its mutagenitic potential, as evidenced by published in vitro or calculated in silico mutagenicity alerts. The magnitude of risk score related to mutagenicity alerts is established by the nature of the alert (in vitro or in silico) and whether there are re-enforcing alerts (both in vitro and in silico alerts). The in silico analysis was performed with the Benigni/Bossa rule base via ToxTree [[3](#page-22-0)].
- 4. The composite safety score for each extractable is determined as the simple sum of the RI, Cramer and Alerts risk scores. On the basis of this process, safety risk scores can range from 0 (lower safety risk) to 8 (higher safety risk). This range was divided into smaller groups so as to provide each extractable with a "safety label".

## Availability Score

In a similar manner, an extractable's availability score is calculated as follows (Table II), based on the accumulated experience gained by testing the many plastics represented in the RI database published in reference 2.

1. In many controlled extraction studies, the total pool of an extractable in the test material is either directly established or inferred. Four total pool categories for extractables





<sup>a</sup> This is the total amount of the extractable that is present in the test article

<sup>b</sup> This is a subjective estimate of how frequently this extractable is encountered in the materials that have been tested by the Baxter organization

<span id="page-3-0"></span>were established, as it is the case that the higher the pool, the larger the amount of extractable that could leach into the drug product and the greater the risk of an adverse safety impact. These total pool classes range from extractables that are present with relatively low pools (that is, as impurities in the polymer) to extractables that were present with relatively high pools (that is, as ingredients in the polymer). The criterion for the lowest risk class (lowest pool) was chosen at 10  $\mu$ g/g, as this value has been established to be a reasonable target level for characterizing materials for extractables [\[4,](#page-22-0) [5](#page-22-0)]. The criterion for the highest risk class (highest pool),  $1,000 \mu g/g$  (or 0.1% by weight), is consistent with lower levels at which additives are intentionally added to plastic materials

- 2. The second dimension of the availability score dealt with the frequency with which extractables were detected in the materials upon which the RI Index database was established, the concept being that the more frequently the extractables were detected in materials, the more often the extractables would be encountered in pharmaceutical systems and thus the greater the safety risk. Three levels were created for establishing the frequency score with a lower score being assigned to those extractables which were rare (i.e., uncommonly encountered even within a material class) and a higher score being assigned to extractables that were commonly encountered across multiple material classes.
- 3. The composite availability score for each extractable is determined as the simple sum of the frequency and anticipated pool scores. On the basis of this process, composite availability scores can range from 0 (lower availability) to 5 (higher availability). This range was divided into smaller groups so as to provide each extractable with an "availability label".

### Solubility Score

Lastly, an extractable's solubility score was calculated as follows (Table III), based on published aqueous

Table III Definition of the Solubility Component of the Risk Evaluation Matrix

Criterion <sup>a</sup>	Solubility score	Safety risk
Solubility $< 0.1$ mg/L	l (insoluble)	Lower
0.1 mg/L $<$ Solubility $<$ 1 mg/L $\ln mgh <$ Solubility $<$ 10 mg/L	2 (relatively insoluble) 3 (relatively soluble)	
Solubility $>$ 10 mg/L	4 (soluble)	Higher

<sup>a</sup> The solubility was established over a pH range of 2 to 10. The solubility that was used to classify an extractable was the highest solubility reported for that extractable over this pH range

solubility data over the pH range of pH 2 to pH 10 [[6\]](#page-22-0). Four solubility classes were established, based on the observation that the higher the solubility of an extractable, the larger the amount of extractable that could leach into the drug product and the greater the risk of an adverse safety impact and roughly corresponding to extractables with low aqueous solubilities (making them essentially insoluble in the drug product) to extractables with relatively higher solubilities (making them highly soluble in and available to the drug product). The criterion for an insoluble extractable was set at 0.1 mg/L to be consistent with a safety threshold relevant for a parenteral drug product. For example, an acceptable daily intake of 120 μg/day has been proposed for genotoxic and carcinogenic impurities in drug products whose duration of exposure is less than 14 days (corresponding to an acute versus a chronic therapy) [[7\]](#page-22-0). If this daily intake were associated with a daily dose volume of 1 L (not untypical of parenteral products such as LVPs), then the corresponding threshold concentration of a leachable in the drug product would be 0.12 mg/L, which is essentially the same as the insoluble criterion. The criteria for the other solubility classes were set at factor of ten steps up from the insolubility criterion.

Table IV Calculation of the total risk score (TRS)

Total risk score = $4 \times$ (Composite safety score) + $3 \times$ (Composite availability score) + $2 \times$ (Solubility score)			
Total risk score ranking			
Total risk score	Categorization	Safety risk	
$()$ -13 <sup>a</sup>	Lowest Risk	l ower	
$14 - 22^{b}$ $23 - 35^c$	Moderate Risk Intermediate Risk		
36 or greater <sup>d</sup>	Highest Risk	Higher	

<sup>a</sup> This is derived by minimizing the safety risk in each of the individual risk components as follows: safety risk (low risk, score 2 or less), availability risk (low availability, score of 1), and solubility (insoluble, score of 1). High end of risk score range =  $4(2) + 3(1) + 2(1) = 13$ .

<sup>b</sup> This is derived by establishing the safety risk in each of the individual risk components as follows: safety risk (low risk, highest score of 3), availability risk (intermediate availability, score of 2), and solubility (relatively insoluble, score of 2). High end of risk score range =  $4(3) + 3(2) + 2(2) = 22$ 

<sup>c</sup>This is derived by establishing the safety risk in each of the individual risk components as follows: safety risk (moderate risk, score 5 or less), availability risk (moderate availability, score of 3), and solubility (relatively soluble, score of 3). High end of risk score range =  $4(5) + 3(3) + 2(3) = 35$ 

<sup>d</sup> The maximum total risk score is obtained using a safety risk (high risk, score of 8), availability risk (high availability, score of 5), and solubility (soluble, score of 4), producing a maximum risk score =  $4(8) + 3(5) + 2(4) = 55$ 

# <span id="page-4-0"></span>Table V Compilation of risk data, group I extractables















## Total Risk Score

Ultimately, a Total Risk Score for each extractable was calculated as a mathematical combination of the individual safety, availability and solubility risk scores. Although multiplicative and additive combinations have been used for other

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risk classifications (for example [[8](#page-22-0)–[13](#page-22-0)]), these combinations are based on an equal weighting of the individual risk factors. Since the focus of this process is safety risk estimation, the safety hazard score has a higher weight than the other factors. Additionally, the availability score, which considers both total pool and frequency of occurrence, was

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# <span id="page-14-0"></span>Table VII Compilation of risk data, group 3 extractables







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weighted higher than the solubility score, which is based on a single input. Considering these weightings, the Total Risk Score was calculated as follows (Table [IV\)](#page-3-0):

Total Risk Score $(TRS) = 4 \times (safety\ hazard) + 3$ 

 $\times$  (availability score) + 2

 $\times$  (solubility score)

Thus a higher TRS corresponds to a greater risk. While the assignment of the weighting factors may be construed to be arbitrary, these values were chosen in the context of establishing Safety Risk Categories, as follows. Specifically, the use of the factors 4, 3 and 2 produced a TRS scale that was sufficiently broad that the extractables could be effectively categorized but not so broad that the distribution of the extractables within the risk categories was distorted by having too many possible TRS values.

Fig. 2 Distribution of the total risk scores (TRS) for the approximately 500 Extractables considered in this study. The total risk scores are normally distributed around a TRS value of 20–23, corresponding to the transition between the moderate and intermediate risk categories. Summary statistics associated with the distribution of the TRS values are contained in Table [VIII](#page-18-0).



<span id="page-18-0"></span>

#### Safety Risk Categories

total risk score

The primary purpose of establishing the Risk Evaluation Matrix and using the Matrix to assign Total Risk Scores to individual extractables is the distribute the population of extractables into discrete Safety Risk Categories, based on the risk that the extractable would adversely affect patient safety as a leachable if a packaging system, manufacturing system or drug delivery device was constructed from a material that could contain the extractable. To accomplish this objective, four Safety Risk Categories were created, corresponding to lowest risk, moderate risk, intermediate risk and highest risk. These somewhat generic descriptors for the Safety Risk Categories were made more concrete by specifying those Total Risk Scores that establish the boundaries of the Risk Categories (see Table [IV\)](#page-3-0). Thus for example, the lowest risk category was established to include all those extractables whose safety hazard was low (corresponding specifically to safety hazard scores or 2 or less), whose availability was low (availability score of 1 or less) and whose solubility was low

(classified as insoluble, solubility score of 1). Clearly, these individual scores were chosen to reflect extractables that represent a low safety risk. Using the previously defined TRS equation, the upper limit of Total Risk Scores for the lowest risk category becomes  $4(2) + 3(1) + 1(1) = 13$ . Thus extractables with a TRS of 13 or less are classified as lowest risk.

Similar calculations for the boundaries in the other three categories are shown in Table [IV](#page-3-0). For example, an extractable in the highest risk category is one whose safety hazard was high (score of 5 or higher), whose availability was high (Availability score of 4 or higher), and which was highly soluble (solubility score of 4).

## RESULTS

The individual Total Risk Scores for approximately 500 extractables are contained in Tables [V,](#page-4-0) [VI](#page-10-0) and [VII.](#page-14-0) These extractables are a subset of extractables which



Fig. 3 Distribution of the total risk scores as a function of Extractables Groups. The entire population of extractables was broken up into three groups as a function of the availability of toxicological data. Extractables in Group 1 had available and adequate toxicological data, extractables in Groups 2 and 3 did not have such data and were safety assessed using surrogate compounds. In Group 2, the surrogate was another extractable from Group 1; in Group 3 the surrogate was not an extractable but merely a structural mimic. Although there are no readily discernible differences in the distributions as a function of extractable's Group, Group 1 extractables are more frequently encountered in the higher risk categories.

<span id="page-19-0"></span>Table IX Extractables in the highest risk cetegory



had been previously assessed for their potential to adversely impact patient safety [[2\]](#page-22-0). Only a subset of the previously-evaluated database was appropriate for use in this assessment as the required information (such as aqueous solubility) was not available for all the members of the previous data set. As noted in the previous assessment, the extractables were initially divided into three groups depending on the availability and rigor of the available toxicological information used to establish the safety score, with Group 1 extractables representing those extractables whose available toxicological information was sufficiently robust to directly assess the safety hazard and Groups 2 and 3 representing those extractables which did not have sufficiently useful toxicological information to directly assess the safety hazard. For those substances in Groups 2 and 3, toxicological information was inferred using structurally similar surrogate substances that possessed sufficiently useful toxicological data, with Group 2 extractables having surrogates that themselves were Group 1 extractables and Group 3 extractables having surrogates which were not extractables themselves. Tables [V](#page-4-0) through [VII](#page-14-0) include the assigned values of the various safety-indicating parameters, the qualitative descriptors associated with the score for each safety-indicating parameter and the Total Risk Score.

A frequency distribution plot for the Total Risk Scores is shown in Fig. [1.](#page-1-0) Summary statistics such as the means, median and mode of the Total Risk Scores are contained in Table [VIII](#page-18-0).

Figure [2](#page-17-0) illustrates the distribution of the extractables in the four Safety Risk classes as a function of the extractable's Group designation. Although the scale of TRS values extends from 0 to 55, the highest TRS obtained for any extractable was 39. The distribution of the Total Risks Scores is generally normal (Fig. [1](#page-1-0)), centered on a TRS score of approximately 20, which corresponds to a classification of moderate risk. The mean, mode and median TRS values were all in the range of 19 to 23 (Table [VIII](#page-18-0)) and there was no meaningful difference in the distribution profiles between the extractable's Groups. The region defined by the mean plus or minus one standard deviation encompasses nearly the entire region of moderate and intermediate risk. The disproportionally large group of extractables with a TRS value of 12 represents compounds which (1) have generally low associated toxicity, (2) are rarely encountered in materials in potentially meaningful quantities (leading to a lower TRS), and (3) which are highly soluble (contributing to a higher TRS value). Numerous extractables shared these fairly common general characteristics and their associated Total Risk Score.

The ten extractables that have been classified into the Highest Risk category are summarized in Table IX. At the other end of the spectrum, the seventy-eight extractables that fall within the Lowest Risk category are summarized in Table [X.](#page-20-0)

#### <span id="page-20-0"></span>Table X Extractables in the lower risk category



## **DISCUSSION**

This effort addresses the situation where one is faced with a material that could be used in a package, device or manufacturing system and asks "what is the likelihood that this material contains a certain extractable that could become a leachable in a drug product at high enough levels to produce an adverse safety issue?" Extractables that have been classified as lowest risk would be unlikely to be both present in such a material at levels that could impact safety if the extractables were to become leachables and if they were present would be unlikely to leach in impactful quantities. Extractables classified as highest risk would be more likely to be present in such a material at levels that could impact safety as leachables and, if

they were present, would be likely to leach in impactful levels. Thus, this effort considers the likelihood that the extractables would be present in the material at high enough levels to be potentially meaningful as leachables and the ability of the extractable to be leached into aqueous drug products if it is present in the material.

In general, risk evaluation matrices are based on mathematical models which are more or less empirical. Although these models can be intuitively compelling, it is rare that the models can be fully and quantitatively justified. Thus while all the parameters of the Risk Evaluation Matrix have been explained, they cannot all be quantitatively justified. For example, one cannot offer a quantitative justification for questions such as "why should a solubility of 10 mg/L be assigned a score of 3 (as opposed to 5)]?" except to note that such an assignment seems reasonable and appropriate in the context of the Matrix. Ultimately the value in the analysis of specific extractables via the Matrix is not so much in the absolute magnitude of the calculated TRS but rather in the categorization of the extractable into one of the four risk categories, especially if the extractable is categorized as either lowest risk or highest risk.

As is the case with any ranking system that produces a quantitative outcome, it is pertinent to consider the "resolving power" of the analysis. For example, application of the Matrix to two structurally similar extractables, 9,10-dihydroxy-12,13 epoxy stearic acid and 3-(2,3-Dihydroxyoctyl)-2 oxiraneoctanoic acid (Table [VI](#page-10-0)) produce TRS values of 38 and 35 respectively. This difference in TRS value, arising from the differing amounts of these two substances in their source materials (the first extractable was considered to be a major impurity while the second was considered as a minor impurity) is the difference between the first extractable being placed in the highest risk category and the second extractable being placed in the intermediate risk category. Although one understands the reason why these two extractables have their respective scores and categorizations, one wonders whether the numerical difference in the scores translates into a meaningful difference in the safety risk associated with the two extractables. In this regard, it is clear that the significance of small differences in TRS between individual extractables in terms of safety risk is marginal and is concluded that a difference of 2 units or less in the Total Risk Score is most likely a meaningless difference.

Listing of extractables that were classified as either lowest or highest risk (Tables [IX](#page-19-0) and [X\)](#page-20-0) indicate that the risk matrix classification has identified more extractables to be lower risk (approximately 15% of the extractables population) and fewer extractables to be highest risk (approximately  $3\%$  of the extractables population), consistent with the observations that (1) extractables tend to be present in their source materials in lower quantities, (2) extractables tend to be associated with specific material types and not with all materials generally, and (3) extractables tend to have low safety scores. Specifically, the extractables in the lowest risk category generally are poorly soluble, are present in only certain materials in low quantities, and have low toxic potential based on Risk Indices, Cramer classification and the lack of mutagencity alerts. Alternatively, extractables in the highest risk category generally have a high solubility and are present in either a specific material type as ingredients or across material groups as high level impurities. These extractables tend to be Cramer Class 3, have mutagencity alerts (or no mutagencity data which is treated as an alert), and have lower Risk Indices (typically 5 mg/day or less). It is noteworthy that three of the ten highest risk compounds are epoxidized acids associated with epoxidized oils that are commonly used as secondary plasticizers and stabilizers. This finding suggests that although such oils may be appropriate for use with polymers used in pharmaceutical applications, one should be sure to account for this type of extractable in any extractables or leachables studies performed on such polymers.

As noted previously, the extractables considered in this manuscript were classified based on their toxicological data with Group 1 extractables being those substances with sufficient and credible toxicological data and Group 2 and 3 extractables being those extractables whose toxicological assessment was based on surrogate compounds. Although there are no readily discernible differences in the distributions as a function of extractables Group, Group 1 extractables are more frequently encountered in the higher risk categories. This outcome is to be expected as it is reasonable to suppose that those extractables with sufficient toxicity data for evaluation (Group 1) would be those extractables that are most commonly encountered and that are present in the materials at higher levels.

Although the process of calculating the Total Risk Scores is generally data-driven and decision-based, the Risk Evaluation Matrix is somewhat empirical. Much of the input information for the matrix (toxicological information, solubilities) is "hard" data as opposed to "soft" intuition- or experience-based claims. Several availability inputs, such as total pool and frequency of occurrence, are experience-based and in the case of this manuscript reflect the experience of one company gained from many years of testing polymeric materials used in diverse medical applications (pharmaceutical containers for parenteral products and drug administration devices). As this experience does not comprehensively cover all medical applications of polymers, it is possible that the availability inputs used in this manuscript are not universally applicable to all medical uses of polymers and that the Total Risk Scores and categorization established in this manuscript are more properly limited to a consideration of parenteral packaging systems and drug administration devices.

Lastly, the Risk Evaluation Matrix was applied to a large population of extractables regardless of the extractable's <span id="page-22-0"></span>source polymer, producing a categorization that was "blind" with respect to the source polymer. One could envision a situation where source polymer would be a means of further segregating the population of extractables. Application of the Risk Evaluation Matrix to each individual group of such a segregated population of extractables could produce a categorization of extractables for each individual polymer that considers only those extractables that are relevant to that polymer. For example, rather than the generic categorization provided in this manuscript, one could produce individual categorizations for individual polymers. Such a segregation of the data population was not performed as source polymer data was not routinely available for the extractables considered in this document.

#### **CONCLUSION**

A Safety Evaluation Matrix has been developed, explained and used to categorize a population of extractables. The utility of such a classification lies in its capacity to facilitate the selection of appropriate polymers for use in pharmaceutical systems, to guide the development of analytical methods for extractables discovery, identification and quantitation and to establish which leachables to target in migration studies. Ultimately the categorization establishes a group of lower and higher risk extractables. Thus potential materials of construction can be screened in terms of whether they could contain higher risk extractables, with the understanding that in general it would be desirable for candidate materials to avoid such high risk extractables. For example, as noted previously, three of the ten higher risk extractables were epoxidized acids that are linked to epoxidized oils in polymers. Thus a "first pass" evaluation criterion for materials for potential use in pharmaceutical applications is "does the candidate material contain epoxidized oils?" Although an answer of "yes" might not necessarily mean that the material is unsuited for pharmaceutical applications, such an answer might alert the packaging development team to a potential concern.

Furthermore, the categorization of the extractables could facilitate the development and justification of analytical screening methods used to characterize extracts for extractables. It is wellknown that analytical methods used to screen extracts for extractables are not universal and thus that certain extractables elude detection by the methods. If one were to intentionally design an analytical method to produce as much potentially

meaningful extractables data as possible, then surely it is the case that greater emphasis would be placed on the method's ability to detect higher risk extractables.

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