Health Canada Santé Canada

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August 10, 2020

20-110866 – 304

Information to Market Authorization Holders (MAHs) of Human Pharmaceutical Products Regarding Nitrosamine Impurities

Revised Extension to Timelines for Completing Risk Assessments as Outlined in Health Canada's October 2nd, 2019 Letter

(Please note that this communication is intended for MAHs of human pharmaceutical products and over the counter medications. It is not intended for MAHs of biologics, radiopharmaceuticals, disinfectants, veterinary or natural health products.)

Background

As part of Health Canada's efforts to mitigate the risk of nitrosamine contamination for all active pharmaceutical ingredients (APIs) and drug products, Health Canada had requested in its letter of October 2, 2019, that MAHs follow a three-step process for conducting risk assessments of their drug products containing chemically synthesized APIs. The initial timeline for conducting the risk assessments (Step 1) was within 6 months of the issuance of the Health Canada October 2, 2019 letter (i.e., by April 2, 2020). However, in light of the challenges being encountered by MAHs in the context of COVID-19, this timeline was subsequently extended by Health Canada to **October 1, 2020** and communicated to MAHs on March 26, 2020.

Moreover, Health Canada requested that subsequent actions for confirmatory testing (Step 2) and any changes to marketing authorizations (Step 3), as required, be completed within two years of the issuance of the Health Canada October 2, 2019 letter (i.e., by October 1, 2021). The

timeframes for Steps 2 and 3 were also subsequently extended to **October 1, 2022** and communicated to MAHs on March 26, 2020.

Health Canada is aware of the continued impact of the global outbreak of COVID-19 that many MAHs continue to face. As a result, **this communication is to inform you that the timeline for conducting the risk assessment(s) (Step 1) has been further extended to March 31, 2021**. At this time, the timelines for completion of Steps 2 and 3 remain unchanged (i.e. October 1, 2022).

It should be noted that despite this extension, MAHs are advised to conduct risk assessments as soon as possible.

Please be reminded that risk assessment documentation should be retained by the MAH, unless nitrosamine impurities are detected in the Active Pharmaceutical Ingredient (API), drug product, or both, during the confirmatory testing. If a risk exists and any nitrosamine impurity is detected at any level in the API or drug product, Health Canada should be informed immediately. Available details surrounding the risk assessment, confirmatory test results and method validation should be submitted at the same time when Health Canada is informed of the detection of the nitrosamine impurity. For more information please refer to the details outlined in the October 2, 2019 letter and the accompanying Questions and Answers document on Nitrosamines in human pharmaceutical products dated June 12, 2020.

Risk information and any related correspondence with Health Canada should be directed as follows:

Location of firm	**Reporting address**
New Brunswick, Newfoundland and Labrador, Nova Scotia, Prince Edward Island, Québec	Health Products Compliance Unit East 1001 Rue St-Laurent Ouest, Longueuil, Québec, J4K 1C7 Phone : 450-646-1353 Toll free : 1-800-561-3350 E-mail : HC.qoc-coq.SC@canada.ca
Ontario	Health Products Compliance Unit Central 2301 Midland Ave., Toronto, Ontario, M1P 4R7 Phone: 416-973-1600 Toll free: 1-800-267-9675 E-mail: HC.insponoc-coon.SC@canada.ca
Manitoba, Saskatchewan, Alberta, British Columbia, Yukon, Northwest Territories, Nunavut	Health Products Compliance Unit West Suite 400 – 4595 Canada Way, Burnaby, British Columbia, V5G 1J9 Phone: 604-666-3350 Toll free: 1-800-267-9675 E-mail: insp_woc-coo@hc-sc.gc.ca

Any additional questions relating to the original October 2, 2019 letter or this communication should be directed to hc.bps.enquiries.sc@canada.ca.

Sincerely,

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For Dr. J. Patrick Stewart, MD, CCFP(EM)
Director General
Therapeutic Products Directorate
Health Products and Food Branch
Health Canada

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For Manon Bombardier
Director General
Natural and Non-Prescription Health Products Directorate
Health Products and Food Branch
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cc.:

Linsey Hollett
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Health Product Compliance
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