

PHARMACEUTICAL MANUFACTURERS

Association

December 27, 1973

Hearing Clerk
Department of Health, Education
& Welfare
Room 6-88
5600 Fishers Lane
Rockville, Maryland 20852

Subject: Comments on Proposal entitled
"Asbestos Particles in Food and
Drugs" Appearing in the Federal
Register of September 28, 1973
(38 FR 27076)

Dear Sir:

The Pharmaceutical Manufacturers Association is a voluntary, non-profit membership association composed of 110 companies engaged in the development and production of prescription and ethically promoted over-the-counter drugs. These companies account for approximately 95% of such products made and sold in the United States. Some manufacturing processes employed by our member firms utilize asbestos filters and talc and therefore these processes will be subject to any final order governing their use.

In General

In the preamble of the subject proposal, it is stated that the Commissioner recognizes that it is not possible to eliminate all sources of asbestos contact with food and drugs. However, it is concluded that it is reasonable to require precautions to be taken in the manufacture of food and drugs to assure that the amount of asbestos fibers is reduced to the minimum feasible level. We agree with such a conclusion but believe that it should also be recognized that reduction in asbestos particles must be accomplished within the bounds of analytical technology and current good manufacturing practices and further that any change in regulatory requirements must be accompanied by an adequate time period for development and implementation of new procedures and techniques.

75P10261

Production and Control Procedures - Section 133. 8

We are in agreement with the goal to prevent any unnecessary exposure to a potential hazard but we are unaware of evidence that asbestos fibers in quantities purported to be present in some parenterally administered drug products have ever been the cause of adverse effects in human recipients, although asbestos has been a component of materials used in processing these drugs for many decades. In addition, we are advised that there is no accepted practical method to demonstrate the presence or absence of asbestos in parenteral drugs.

The physical characteristics of many drug products permit the use of membrane filters and in such instances drug manufacturers have implemented appropriate procedures. Many products, however, particularly biologicals, cannot be filtered through membranes. Asbestos-containing filters have been used in the manufacture of biological products for many years. The advantages of such use include basic effectiveness as filters as well as reported depyrogenizing effects and adsorption of undesirable components including active viral particles in the manufacture of tissue culture vaccines. Products such as Immune Serum Globulin (Human), Tetanus Immune Globulin (Human) and Normal Serum Albumin (Human) cannot be filtered through membranes at temperatures required to prevent possible development of pyrogens. Subsection 133. 8(j) of the proposal would prohibit the use of an asbestos-containing filter without subsequent use of an additional non-asbestos-containing membrane filter unless proof is submitted that the use of a non-asbestos-containing membrane filter would compromise the safety or effectiveness of the drug. In the case of many biologicals, required proof that the use of non-asbestos-containing membrane filters will compromise the safety or potency of these products is not available and would require considerable time to ascertain. Imposition of such a requirement in any final regulation would seriously hamper the continued production of many biologicals necessary for the maintenance of the public health.

Additionally, subsection 133. 8(j) is ambiguous. The heading of the subsection is entitled "Use of asbestos-containing-filters." Despite this title, the first sentence of the subparagraph makes reference to the term "filters" without qualification and the second sentence refers to "fiber-releasing filters" without qualification. As written, the paragraph is not clear as to whether it is intended to eliminate all fiber-releasing filters in the manufacture of parental drug ingredients or if it refers only to asbestos filters.

In view of the above factors, we suggest that the section be clarified and republished as a proposal so that interested parties will know whether it relates only to asbestos-containing filters or to non-asbestos fiber-releasing filters as well. Additionally, the modified proposal should contain provisions for the use of asbestos filters without the requirement for "proof" that inclusion of a membrane filter will compromise the safety or efficacy of the drug.

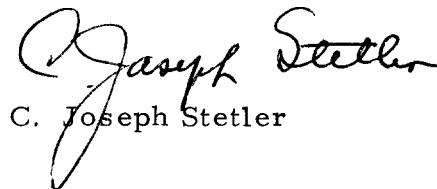
Talc - Section 121.2006

Several of our member firms have indicated that the microscopic test procedure proposed in this section to determine presence of asbestos in talc is inadequate, inaccurate, and time consuming. In some instances, member firms submitted suggestions for modification of the present proposed microscopic test procedure while in other cases new methods were submitted. We believe that these methods and modifications should be studied and therefore, we have enclosed them with this submission and have designated them as Exhibits A, B, and C.

Since it is obvious that differences of opinion exist concerning proposed test procedures and their applicability and feasibility, we suggest that promulgation of any final regulation be postponed until the state of the art is ascertained and all scientific opinions can be studied. We suggest that FDA establish a working committee with industry and other interested parties to study asbestos content in parenteral solutions and talc and that such a committee make recommendations for appropriate test procedures that will effectively measure the presence of asbestos. With respect to this suggestion, we are willing to contact knowledgeable scientific personnel to assist in the development of any test methodology.

We hope these comments will be of assistance to you.

Respectfully submitted,


C. Joseph Stetler

Enclosures.